

27 February 2026

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

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Dear Ms Fishburn

## Regional Planning Reforms

Thank you for the opportunity to comment on the Regional Planning documents currently out for consultation. Thank you also to Tom Lommes and his team for meeting with Urban Taskforce Australia members and for their willingness to listen to feedback and consider all matters raised.

The three papers released – *A New Approach to Strategic Planning*; *Statewide Policy for Industrial Lands*; and the draft *Sydney Plan* – provide a reasonable insight into the NSW Government's plans and answer some questions while raising others.

Urban Taskforce Australia believes that the picture is not complete, and members have some concerns about potential conflicts, inconsistencies, and uncertainties when it comes to reconciling the proposed Plan with existing Government policy goals.

We welcome the chance to provide feedback on these documents on behalf of our members and appreciate the complexity involved in developing regional plans and policies for strategic planning across the State.

We broadly support the proposals and trust that our comments will be taken with that in mind.

### **The overarching plan and some supporting policies are not available**

Urban Taskforce welcomes the NSW Government's new approach to regional planning, particularly the draft Sydney Plan.

This replaces the disastrous 2018 "*Metropolis of Three Cities*", which saw planning wrapped up in rolls of red (strategic planning) tape and housing supply strangled.

New South Wales is still feeling the effects of that strategy and is struggling to get back to the halcyon days of high housing approval numbers that preceded the previous Plan.

However, we have some concern that the current draft Sydney Plan is being rolled out in piecemeal fashion, preventing the community from seeing how each of the plans and policies interrelate and operate.

This increases the risk that issues or concerns could fall between the cracks, and the Department of Planning, Housing, and Infrastructure will need to be prepared to address some of the inevitable conflicts that will arise from different papers being finalised at different times.

Without the release of the overarching State Land Use Plan and certain policies, the community could be missing some important context.

**Recommendation 1-1: That the State Government release the State Land Use Plan as soon as possible and allow for flexibility to make amendment to the Sydney Region Plan, so that it can be compared and reconciled with the draft Sydney Plan.**

### **It appears to be a Plan to have a plan**

Although there are some tangible strategies outlined in the new Sydney Plan, many of the solutions, appear to be a Plan for a plan.

These actions state that reports, research, or standards will be developed over the next 12-24 months, meaning that key elements of the proposals – some of which are needed to guide local government activities – are not yet in place.

A developer looking to pursue opportunities in the growth centres of Sydney will still be left with questions affecting their decision-making, having to wait until further reports, masterplans, or updated local environment plans are available to fill in the gaps.

The Plan, therefore, does not yet help industry to do its own planning for the delivering of housing supply.

Positions outlined in the Plan do not provide sufficient guidance or “hooks” to support a clear path for rezoning applications, nor will the specified actions force councils to develop a vision for these areas that is based in reality.

More detailed documentation will be required to guide development decision-making over the next few years, particularly if councils are to develop their part of the process.

**Recommendation 1-2: That the State Government release a more detailed timeline for the delivery of all plans, guidelines, and documents supporting the implementation of the Sydney Plan.**

**Recommendation 1-3: That the State Government prioritise and fast-track plans and strategies detailing future opportunities in growth areas.**

### **Too much is still left for under-supervised councils to do**

The structure of the new approach to strategic planning creates a demarcation between different levels of government.

To some degree, this makes sense:

- **State Land Use Plan:** *What must happen and why;*

- **Region Plans:** *Where and when growth should occur, including new homes, jobs and infrastructure; and*
- **Local strategic planning:** *How the plan will be delivered in each local government area.*

However, in Urban Taskforce's experience there have been a range of councils which have taken the opportunity, when developing local environment plans or development control plans, to subvert the policy intent of the State Government or to put barriers in the way of new development.

For example, recently Randwick Council was receiving submissions on its planning proposal for Randwick Junction, which allowed for minor uplift, but applied a minimum of 3% affordable housing levy on the total floor area of each new development (in some cases it was 7% or 9%). These proposals would make feasibility very unlikely, and so would act as a handbrake on most new applications

At the same time as those submissions were due, Council was getting ready to propose a moratorium on student accommodation because it wasn't subject to the same restrictions or conditions as other dwellings in the Randwick Junction (and other) precinct(s) and so was cheaper to build. A fact about which Council was none too pleased.

This followed changes pushed by a range of councils on everything from housing affordability to developer contributions to local character areas, all of which make new development more difficult to achieve.

Many councils are not concerned with project feasibility and appear to see the development sector as a convenient source of revenue for pet projects, ignoring the impact that this has on housing prices and affordability.

So, while we acknowledge the practicality of the process, and how it fits into the proposed strategic planning framework, leaving the "how" to councils could potentially lead to adverse outcomes, absent strict NSW Government oversight.

This is not to suggest that councils should not do the work, but the Department of Planning, Housing, and Infrastructure needs to watch closely to ensure that the implementation of the strategy delivers on the vision.

**Recommendation 1-4: That the State Government develop processes to oversee the work councils will be performing to tailor the Sydney Plan to their local region, so that any implementation strategies are aligned with the statewide policy.**

### **The priorities, and other elements, need further detail**

The priorities, which are intended to "*set statewide direction and cascade through regional and local planning*" are relatively light on detail.

While this allows for generalised statements to be used, it means that there is little in some of these principles that is tangible or measurable.

Thus, often principles provide generalised statements about what is needed, but contain little that can cascade through to the local level, because there is no way of knowing whether they have been achieved.

For example, it is clearly correct to say that more housing supply will bring down cost and wait times, but that does not mean that Strathfield Council, which has only approved 265 dwellings out of a pro-rata National Housing Accord target of 1,050 (just 25.2%) will be on board to approve the housing needed to bring down those costs.

The State Government needs to develop metrics to underpin each of the priorities, and similar detail for the 12 responses in the Sydney Plan, so that councils clearly understand what they are to deliver and what they will be measured upon.

If it's not measured, it's not managed.

**Recommendation 1-5: That the State Government provide detail and metrics in the priorities and responses in the Sydney Plan to allow for measurable reporting of performance by councils.**

### **The need for a Centres policy**

One of the most important documents, that has not yet been released on public exhibition, is a Centres policy.

According to the Sydney Plan, Response 4.1 on page 52, this is due sometime in 2026, and Urban Taskforce awaits its release with great anticipation.

The *Statewide Centres Policy* should guide the identification, servicing, connectivity, and delivery of different types of community.

A well drafted policy would ensure, through more mixed-use development and flexible zoning, that land can be used most efficiently and respond to market demand.

It should also recognise the role that allowing for high rise, high density residential land use in CBD core centres in making commercial and employment development feasible. Not only does mixed use development in these locations enliven those precincts, but it creates the economic feasibility needed to drive commercial renewal and investment.

The new Sydney Plan must reflect the changing circumstances of employment and commerce (work from home, technological improvements, changing nature of consumption, and purchasing goods and services etc) and allow flexibility into **all** CBD and commercial centres. The HDA is already applying this flexibility – so it would be ironic if they were doing so in contravention of the new Region Plan.

The new focus on Transport Oriented Development (TODs) – particularly the accelerated precincts – may very well conflict with the existing proposed Draft Centres policy principles as proposed in the draft Sydney Plan.

It is critical that the plan, once again, recognises the essential contribution made to any and all strategic centres by the inclusion of high rise, high density residential or mixed-use development.

The 2018 Region Plan entitled “A Metropolis of Three Cities” included some important, but negative, changes from the vastly superior Region Plan published in December 2014 “A Plan for Growing Sydney”. The change related to the definition

(or characterisation) of "Strategic Centres", removing in the 2018 Plan the specific reference to "higher density" housing.

This led to courts and panels interpreting this as a conscious and deliberate change designed to rule out high rise and high-density residential development in these centres. Councils that did not want residential housing in CBD core areas, like Willoughby (for example), were given the tools to block it with this errant change to the Strategic Plan.

It resulted in the prohibition of high-rise residential development in some parts of the Chatswood CBD and in Bondi Junction, as councils used the altered definition in the Region Plan to prevent it.

In the new Plan, this change should be explicitly reversed, to allow and promote higher density housing to be built in CBD centres, Commercial Centres and Retail Centres.

A hierarchy of considerations needs to be established, pursued, and enforced. A flexible dynamic conception of centres should be outlined in the policy and embedded in the Region Plan, prevailing over local considerations (LEPs and DCPs) that often seek to preserve village characteristics.

There is also a need to rationalise the number of different types of centres.

On regional and local industrial lands, mixed-use development should be an option.

The delivery of industrial space isolated from any other uses, risks placing employment a long way from residential areas, increasing commute times and escalating costs for employees.

Allowing for mixed-use development, which enables a developer to respond to market demand, will place people near employment and provide opportunities for NSW residents.

**Recommendation 1-6: That the State Government introduce a Centres policy that allows for Strategic Centres that maximise housing and employment space in areas close to transport infrastructure, including on regional and local industrial lands.**

### **Current zoning practices are too restrictive**

The Plan still applies a zoning-based approach to lands, failing to fully embrace **mixed use** or to recognise the important nexus between home and work.

This is a different approach to that taken by the biggest, most successful cities in the world, which don't stick to a demarcated zoning system. In these metropolises, apartments sit above shops, workshops, studios, and the like, allowing people to live near their work and creating precincts that don't shut down at 5pm.

The Sydney Plan appears to disregard the experience of other large cities, focusing instead on preserving the original planners' intent for lands rather than seeing the potential of what could be.

Open zoning is a possible solution, and it should be considered as part of the priorities.

It delivers more flexible, market-responsive solutions to community needs, by not tying a site down to a single development type and allowing land to be unencumbered by remotely implemented planning decisions.

**Recommendation 1-7: That the State Government embrace the opportunities and benefits of open zoning for market-responsive development as a key element of its strategic planning approach.**

### **Housing-supporting infrastructure delivery is lagging**

The Sydney Plan is a positive step to opening up growth areas, and will hopefully deliver the housing supply Sydney needs, but it will need some changes in thinking if it is to break out of the shadow of its predecessor.

The Infrastructure Opportunities Plan is a good start, but more targeted infrastructure will be needed in western Sydney's growth areas if sufficient levels of new greenfield housing are going to be delivered.

**Recommendation 1-8: That the State Government expand the Infrastructure Opportunities Plan proposals for western Sydney to stimulate new housing development.**

### **Affordable housing will kill development**

The State Government's proposal to mandate affordable housing policies for councils threatens to make the housing crisis worse.

Councils are already failing to hit their Housing Accord targets, approving just a fraction of what they are meant to deliver, and NSW is at least 20,000 dwellings a year behind where it needs to be.

Yet, in perpetuity affordable housing levies are being placed on developments by local authorities to satisfy their virtue-signalling policy goals.

These are based on erroneous assumptions about a developer's capacity to pay, with no concern about the accuracy of those beliefs, and no attempt to determine feasibility or the cost to the end consumer.

Affordable Housing levies, particularly when applied in perpetuity, often (almost always) fail to account for construction costs and the impact of construction feasibility.

The result is that developments don't proceed, or the price of housing increases.

There needs to be strong oversight by the NSW Government of any affordable housing policies to ensure that feasibility is at the core.

An incentive-based approach, such as the successful Infill Affordable Housing Bonus Scheme, is recommended, as it provides developers with a trade-off to subsidise the affordable housing that allows them to preserve feasibility.

**Recommendation 1-9: That the State Government work with local councils to develop incentive-based, outcomes focused, affordable housing policies.**

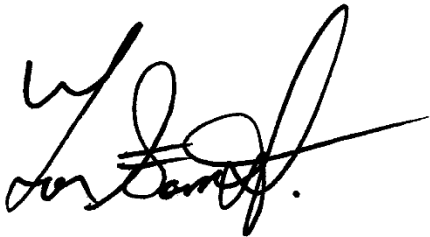
## **Conclusion**

Urban Taskforce Australia welcomes *A New Approach to Strategic Planning*; *Statewide Policy for Industrial Lands*; and the draft *Sydney Plan* and bids adieu to the ill-fated and ill-conceived “*Metropolis of Three Cities*”.

We strongly support DPHI's initial steps into statewide strategic planning and look forward to the significant progress that this work promises.

Should you wish to discuss any aspect of this submission further, please contact our Policy, Planning and Research Analyst, Paul Waterhouse, on 0411-875-366 or via email at [paul@urbantaskforce.com.au](mailto:paul@urbantaskforce.com.au)

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Forrest', written in a cursive style.

**Tom Forrest**

Chief Executive Officer

*Appendix 1: Summary of Recommendations*

*Appendix 2: A New Approach to Strategic Planning*

*Appendix 3: Statewide Policy for Industrial Lands*

*Appendix 4: The Draft Sydney Plan – Priorities*

*Appendix 5: The Draft Sydney Plan – Responses*

# Appendix 1: Summary of Recommendations

## Cover letter

### **Recommendation 1-1:**

That the State Government release the State Land Use Plan as soon as possible and allow for flexibility to make amendment to the Sydney Region Plan, so that it can be compared and reconciled with the draft Sydney Plan.

### **Recommendation 1-2:**

That the State Government release a more detailed timeline for the delivery of all plans, guidelines, and documents supporting the implementation of the Sydney Plan.

### **Recommendation 1-3:**

That the State Government prioritise and fast-track plans and strategies detailing future opportunities in growth areas.

### **Recommendation 1-4:**

That the State Government develop processes to oversee the work councils will be performing to tailor the Sydney Plan to their local region, so that any implementation strategies are aligned with the statewide policy.

### **Recommendation 1-5:**

That the State Government provide detail and metrics in the priorities and responses in the Sydney Plan to allow for measurable reporting of performance by councils.

### **Recommendation 1-6:**

That the State Government introduce a Centres policy that allows for Strategic Centres that maximise housing and employment space in areas close to transport infrastructure, including on regional and local industrial lands.

### **Recommendation 1-7:**

That the State Government embrace the opportunities and benefits of open zoning for market-responsive development as a key element of its strategic planning approach.

### **Recommendation 1-8:**

That the State Government expand the Infrastructure Opportunities Plan proposals for western Sydney to stimulate new housing development.

### **Recommendation 1-9:**

That the State Government work with local councils to develop incentive-based, outcomes focused, affordable housing policies.

## **A New Approach to Strategic Planning**

### ***Recommendation 2-1***

That the State Government should:

- Detail its expectations about what must be included within a Local Strategic Planning Statement (LSPS); and
- Provide funding to assist local councils with the redrafting of LSPSs, so that staff are not diverted from development assessment responsibilities.

### ***Recommendation 2-2***

That the State Government should:

- Actively seek to promulgate and implement strategies to prevent the undermining of LMR and TOD policies by local government; and
- Ensure that infrastructure delivery is closely linked to housing supply outcomes.

### ***Recommendation 2-3***

That the State Government:

- Clarify how the State Land Use Plan will set the vision and priorities for the Sydney Plan when it has not yet been made public;
- Release the State Land Use Plan for public consultation before finalising the Sydney Plan;
- Provide a timeline for the development and release of supporting policies; and
- Commit to amending the Sydney Plan and industrial lands priorities in response to feedback from the community on the State Land Use Plan.

### ***Recommendation 2-4***

That the State Government provide more detailed descriptions and appropriate performance metrics for its state-wide priorities to ensure that regional and local implementation efforts deliver on the State vision.

### ***Recommendation 2-5***

That the State Government:

- Ensure that councils are given clear directions on what outcomes they must achieve from local planning;
- Measure council performance in addressing State goals in their local strategic planning strategies;
- Review and make modifications to the Region Plan at least twice a year to ensure it maintains relevance with changing context and market demands; and,
- Hold councils to account when local strategies are shown to depart from, or contradict, state planning goals.

## **Statewide Policy for Industrial Lands**

### ***Recommendation 3-1***

That the State Government authorise the Employment Lands Development Program (ELDP) to revise the draft Sydney Plan to:

- Allow for mixed-use development on regionally and locally significant industrial lands;
- Reclassify any site declared by the HDA as SSD for residential development, or currently included within a transport-oriented development zone, as locally significant industrial land;
- Reclassify any E3 – Productivity Support zoned land as locally significant industrial land; and
- Allow for more land currently designated regionally significant industrial land to be deemed locally significant – thus allowing for a merit-based assessment on any mixed use or non-industrial land use proposal.

### ***Recommendation 3-2:***

That the State Government authorise the Employment Lands Development Program to identify and classify industrial lands on an iterative basis, in consultation with landholders.

### ***Recommendation 3-3:***

That the State Government consult further over industrial land intensification goals to:

- Determine whether intensification is supported by industrial businesses;
- Review the impact of local policies on sites being redeveloped; and
- Ensure that brownfield industrial lands do not have to comply with policies that would reduce available floorspace or site utility.

### ***Recommendation 3-4:***

That the State Government prioritise industrial land-enabling infrastructure to ensure that new sites are development-ready.

### ***Recommendation 3-5:***

That the State Government adopt open zoning principles to allow the market to decide the best use for individual industrial sites.

## **The Draft Sydney Plan Priorities**

### **Recommendation 4-1:**

That the Priorities in the draft:

- reduce or abolish taxes, fees, and charges for housing developments; and
- work with local councils to develop incentive-based, time limited, affordable housing policies.

### **Recommendation 4-2:**

That the State Government emphasise the importance of mixed-use development and open zoning as part of a centres policy to deliver the types of development that meet community needs.

### **Recommendation 4-3:**

That the State Government revise transport-oriented development policies to allow for more mixed-use development in TOD locations.

### **Recommendation 4-4:**

That the State Government:

- simplify biodiversity compliance requirements;
- commit to compulsory acquisition of undevelopable land; and
- adopt 1-in-100-year benchmarks as the standard for planning in flood zones, tested using realistic scenarios.

### **Recommendation 4-5:**

That the draft Sydney Plan Priorities:

- be amended open space requirements to determine if they are realistic for higher density communities;
- be amended to require RPAs to consider all green and open space in the region (not just the precinct), including regional parkland, state forests and National Parks
- require councils rezoning land as open space to compensate the landholders for the highest value of their land as if it were developable, not for its value as open space.

### **Recommendation 4-6:**

That the State Government investigate ways to subsidise infrastructure delivery in growth areas so that the costs don't fall completely on new homebuyers.

## The Draft Sydney Plan Responses

### **Recommendation 5-1**

To facilitate delivery against the new housing targets, the Sydney Plan should be amended as follows:

- **Both Housing Accord Targets and ten year Targets should be codified;**
- **To speed up the planning system and reduce costs associated with planning assessment, planning documents should be simplified and the level of reporting (including for SSD) reduced. This should be written into the Actions and responses;**
- **The Sydney Plan should explicitly contemplate councils assessing and determining rezoning applications more quickly and easily, particularly in areas where the regional plan identifies a need for further growth.**

### **Recommendation 5-2:**

To deliver a better mix of dwellings that meets community needs, the State Government should:

- **conduct a residential zone review similar to the one performed in Auckland; and**
- **review the Apartment Design Guide regarding solar access to enable greater flexibility in this area, reduce the ADG's complexity, allow for smaller, more affordable apartments.**

### **Recommendation 5-3:**

The State Government should investigate alternatives to current affordable housing policies that deter development, and look at creating an outcomes-focused, incentives-based policy.

### **Recommendation 5-4:**

The State Government should finalise the centres policy and create incentives for councils to consider more mixed-use development.

### **Recommendation 5-5:**

The Responses to the Priorities in the Sydney Plan should be amended:

- **Focus fees and charges on essential infrastructure; and**
- **Clearly identify areas where the Commonwealth Government should increase its investment in housing related infrastructure, to facilitate development.**

### **Recommendation 5-6:**

The State Government should ensure that increased activity at a precinct level does not come at the cost of new home buyers, and that adequate transport is provided to support late night activity.

**Recommendation 5-7:**

The State Government should conduct a new study of open space and community facility requirements to determine what is necessary and what cost is reasonable for infill and greenfield communities.

**Recommendation 5-8:**

The State Government should designate more industrial land as “locally significant” to allow more flexibility in zoning and use.

**Recommendation 5-9:**

The State Government should ensure that the 1:100 benchmark for flood planning is retained, and that councils invest more in risk mitigation.

**Recommendation 5-10:**

The State Government should develop 10-year housing targets for Sydney councils.

**Recommendation 5-11:**

T The State Government should clarify responsibilities for providing and maintaining tree canopies.

## **Appendix 2: A New Approach to Strategic Planning**

Urban Taskforce Australia welcomes the policy document *A New Approach to Strategic Planning* and its proposed changes to state and regional planning in New South Wales.

The paper identifies the likely 2 million person increase in population in the next 20 years, and that there is a need to fix the “fragmented and complex” planning system.

Urban Taskforce supports the proposed restructure as reasonable and workable, with a view to making strategic planning more responsive, to reduce duplication and inconsistency, and to align planning with infrastructure delivery.

If achieved, these goals could make a significant difference to strategic planning in NSW, but the challenge will be to allow the system to work and not to let politics and local vested interests undermine the collective good.

We look forward to collaborating further with the NSW Government to ensure that a sufficient supply of housing, industrial, and commercial properties can be delivered to meet the needs of the population.

### **Perceived strengths of the current system**

Urban Taskforce has been highly critical of the former government and the complete failure of strategic planning under the ill-conceived Greater Sydney (then Cities) Commission. The current planning system, with an outdated and irrelevant Region Plan, is a hodgepodge of initiatives, plans, and priorities. Most significantly, it ignored housing and failed to foresee nor deal with the housing supply crisis. Every other interest was addressed – just not the most important one.

While the paper points out some of the benefits that have come from previous initiatives, many of these appear to be the result of accidental fortune, rather than careful management.

### **Local Strategic Planning Statements (LSPS)**

It is true to say that all LGAs have LSPSs but, while these were being written, development assessment was largely put on hold.

Council officers were taken off DA approvals work to focus on creating the statements instead.

The result was NSW housing approvals plummeting from high points of 2016-17, when around 75,000 dwellings were reaching construction certificate stage down to around 51,000 approvals in 2019-20.

As a State, we have struggled to improve significantly from that collapse in approvals and are considerably below our National Housing Accord targets. Without significant financial support, there is very little chance that updated LSPSs will be finalised by the end of Q3 2026, unless councils simply resubmit what they have already developed.

And the existing LSPSs are part of the problem. Rather than giving effect to the overarching State Government policy, LSPSs provided councils with an opportunity to reinforce the restrictions they wanted to apply to development within their

jurisdiction, by stipulating "local character" requirements and the provision of social and affordable housing quotas.

For example, Ku-ring-gai Council's LSPS states:

*"The [Housing] Strategy will inform numbers, location and typology of dwellings deliverable within Ku-ring-gai plus address the growing issue of **housing affordability at the local level**. It will also clarify **how the additional housing provision will retain, enhance and develop the current and future local character** and factor into the liveability of neighbourhoods as stipulated in the regional and district plans."*<sup>1</sup> (our bold)

This is a strategy of limiting what can be developed and where, rather than embracing and facilitating the delivery of new housing.

It enabled council staff to pander to anti-development councillors and ratepayers and gave assessors carte-blanche to reject applications they felt did not meet the local character.

The existence of LSPSs may provide a local vision, but it does not mean that vision necessarily aligns with the State Government's.

**Recommendation 2-1: That the State Government should:**

- **Detail its expectations about what must be included within a Local Strategic Planning Statement (LSPS); and**
- **Provide funding to assist local councils with the redrafting of LSPSs, so that staff are not diverted from development assessment responsibilities.**

***Alignment with infrastructure investment and state-led precinct planning***

Although there has been a greater emphasis on linking development with existing infrastructure and the State has embraced precinct planning, too much policy is being negated by local initiatives without apparent challenge from the State Government.

DPHI rubber stamps too many LEP changes that work against NSW Government policy.

Councils with an anti-housing-density agenda such as Woollahra, Northern Beaches, Ku-ring-gai, Willoughby, and now Mosman, promote efforts to undermine low and mid-rise housing (LMR) policy and transport-oriented development (TOD) through changes to DCPs, heritage listings, or legal action.

This reduces certainty and deters development, which is the apparent goal, not an unintended consequence.

Unchecked, councils can broadcast their opposition to the State Government's policies and to throw hurdles in the way of project feasibility, appealing to local NIMBY sentiments.

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<sup>1</sup> [https://shared-drupal-s3fs.s3-ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/Local+Strategic+Planning+Statements/Ku-ring-gai+Council+++Local+Strategic+Planning+Statement+2020.pdf](https://shared-drupal-s3fs.s3-ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Local+Strategic+Planning+Statements/Ku-ring-gai+Council+++Local+Strategic+Planning+Statement+2020.pdf), page 43.

For greenfield sites, projects are being halted as promises of infrastructure fail to eventuate, and dwelling numbers are increasingly being capped far below what was initially approved.

The Infrastructure Opportunities Plans generated through the UDP process are a welcome contribution to this infrastructure deficit, helping to identify the priority projects that will underpin housing supply. Industry will watch closely to see how infrastructure – particularly in greenfield locations – is identified and delivered.

If the housing supply crisis is to be addressed, Greater Sydney will need a mix of infill and greenfield developments, supported by much-needed infrastructure, that cater to the needs of a broad cross-set of our region's population.

**Recommendation 2-2: That the State Government should:**

- **Actively seek to promulgate and implement strategies to prevent the undermining of LMR and TOD policies by local government; and**
- **Ensure that infrastructure delivery is closely linked to housing supply outcomes.**

**Strategic planning tiers**

Urban Taskforce members largely agree with the identified challenges of the current planning system, and welcome changes to reduce duplication, inconsistency; fragmentation, inequity, inflexibility, and disconnect.

The current system has layered reform on top of reform, to the point where it is confusing and, in many cases, unworkable.

The intention of using the State Land Use Plan to define priorities, region plans to map them, and local plans to deliver them is therefore a reasonable and logical response.

If this approach leads to planning policy that can be developed and implemented consistently it will be of considerable benefit to the community.

However, no State Land Use Plan is yet available, so it is difficult to assess how it will influence the Sydney Plan or other regional strategies.

While we recognise the logistical issues in developing and releasing state and regional plans concurrently, *A New Approach to Strategic Planning* highlights the importance of having this overarching framework in place.

Similarly, the thematic policies underpinning the State Land Use Plan are important components in understanding and implementing the Sydney Region Plan. However:

- to date only one policy – industrial lands – has been released;
- there is no indication about what other policies are being prepared; and
- no timeframe has been identified for when these supplementary policies will be made public.

The Sydney Plan should be assessed within the framework of the State Land Use Plan and supporting policies, so that their interrelationship between these documents can be understood and properly analysed.

**Recommendation 2-3: That the State Government:**

- **Clarify how the State Land Use Plan will set the vision and priorities for the Sydney Plan when it has not yet been made public;**
- **Release the State Land Use Plan for public consultation before finalising the Sydney Plan;**
- **Provide a timeline for the development and release of supporting policies; and**
- **Commit to amending the Sydney Plan and industrial lands priorities in response to feedback from the community on the State Land Use Plan.**

**Cascading priorities**

From a high level, the seven priorities proposed for the State Land Use Plan – Aboriginal Outcomes, Housed, Prosperous, Connected, Resilient, Liveable, Co-ordinated – appear to be reasonable.

But they are too high level, and without further detail, might lead to misapplication. Further clarification might be needed if these principles are to guide local council planning schemes.

The strategic planning framework should provide clear direction and specific benchmarks for issues that the State Government believes need addressing and provide more flexibility for tailoring for less essential concerns.

The proposed modular approach to strategic planning is welcome, as it will allow faster adaptivity to changing circumstances, but more detail is needed at the higher level to make clear the intentions of the NSW Government.

This will require more evidence to support decision-making, and appropriately rigorous, well consulted, and regular reviews of existing documents to ensure ongoing currency.

**Recommendation 2-4: That the State Government provide more detailed descriptions and appropriate performance metrics for its state-wide priorities to ensure that regional and local implementation efforts deliver on the State vision.**

**Roles and responsibilities**

As noted earlier, the demarcation of strategic planning into priorities and directions (State), strategies and sequencing (region), and local implementation makes sense, but will need clear guidance from top to bottom to guarantee success.

Too often State policy is undermined at a local level, so clear direction and metrics will be needed to ensure that the goals of the NSW Government are appropriately met.

The ongoing delivery of housing supply is dependent on clear top-down direction, as demonstrated by the apparent reluctance to, or inability of, many councils to meet their National Housing Accord targets.

This means that more oversight will be needed of the development of local plans to ensure that State Government goals are delivered. DPHI needs to be more than a

rubber stamp for bad Council policies. While that was the direction taken by the former government, it cannot be the case today.

Where planning proposals are not consistent with the Region Plan, but are widely perceived to have merit, the Region Plan should be reviewed and updated. This should happen on a rolling basis with changes formalised twice a year.

Ongoing monitoring will help to identify departures from accepted policy, and the NSW Government must be prepared to step in and deal with councils choosing to subvert their policies quickly and expeditiously.

**Recommendation 2-5: That the State Government:**

- **Ensure that councils are given clear directions on what outcomes they must achieve from local planning;**
- **Measure council performance in addressing State goals in their local strategic planning strategies;**
- **Review and make modifications to the Region Plan at least twice a year to ensure it maintains relevance with changing context and market demands; and,**
- **Hold councils to account when local strategies are shown to depart from, or contradict, state planning goals.**

**Feedback questions**

***What barriers do you encounter in the current framework?***

- Outdated regional plans that have a lack of proper evidentiary basis for any planning directions.
- Tokenistic reviews that do not deliver much-needed change.
- A lack of genuine community consultation on the issues, and inadequate responses to submissions to address concerns raised.

***How could the State Land Use Plan shape or support local planning and decision-making?***

- Providing clear directions on what is to be achieved and what constitutes successful implementation.
- Clarity and detail in the priorities to be delivered, so that there is little room for misinterpretation.
- Constant monitoring and enforcement against pre-determined performance metrics to ensure that State policy is being implemented.

***What would make region plans more useful in driving action and tracking whether outcomes are achieved?***

- Active overview and enforcement from DPHI to ensure that policy outcomes are delivered.

- Reporting requirements for councils to demonstrate how they are delivering the priorities and goals set at the state level.

***Does the proposed structure provide enough clarity on who is responsible for planning and implementation at each tier?***

- At a high level it creates demarcation but, without clear direction from the top, it could easily be either deliberately or inadvertently subverted by anti-housing supply activists, council staff, councillors, or Planning Panel members. Clear directions also assist the Land and Environment Court in its important work.

***What further support would councils or agencies need to deliver their responsibilities under this model?***

- Clearer guidance and direction on what implementation is expected to look like, and metrics to allow for quantitative measurement of performance.

***Do the proposed regional planning boundaries make sense for how infrastructure and growth are planned and delivered in your part of NSW?***

- Yes. However, the NSW Government should ensure that, wherever possible, there is consistency in application of the State Land Use Policy through regional and local plans.

***How can the framework make sure that State and regional priorities are delivered locally, through plans that directly shape housing, jobs and infrastructure outcomes?***

- Through direct guidance on what is expected and clear metrics on how outcomes will be measured.
- Councils that deliberately seek to subvert state policy should be held to account.

***Feedback is invited on whether these priorities are the right ones to guide land use planning across NSW.***

- The priorities are fine, but their descriptions are too vague. At the moment it is difficult to see what they are likely to deliver.
- More detail will be needed to ensure that those who are implementing the priorities understand what is expected of them.
- A greater focus on delivering market-housing, rather than affordable housing, and on increasing flexibility and opportunity through open zoning, would help to respond to market needs and increase the availability of housing.

***What types of triggers would make updates meaningful?***

- There should be regular review of individual modules, guided by evidence of where development is actively being hampered by planning policy.

***Which plan components should be modular versus core?***

- All components of the strategic plans should be modular, to allow for rapid reviews and corrections to be undertaken.

***How can monitoring drive real action?***

- By comparing performance to key metrics, councils that choose to work against the State policies can be identified and held to account.

***How can plans remain flexible and responsive?***

- If a planning proposal must be consistent with the region plan, but there is a problem with the region plan, proponents of that proposal should be able to request a review of that specific part of the region plan. These should be considered frequently – at least twice per year.

## Appendix 3: Statewide Policy for Industrial Lands

Urban Taskforce welcomes the proposed Statewide Policy but believes that:

- it designates too much land as regionally significant when it could justifiably be locally significant;
- the identification and classification of industrial lands should be an iterative process, in consultation with industry;
- plans for intensification of industrial sites could prevent the renewal of existing stock;
- any identified industrial lands should be “development ready”; and
- a more open approach to zoning should be taken to allow the market to decide what is needed.

### What industrial land should be “Regionally Significant”?

Regionally significant industrial land cannot be used for any purpose other than industrial development, preventing mixed-use development options and flexibility for landholders. This will affect a large swathe of planned industrial sites – according to the draft Sydney Plan, 3% of industrial lands are intended to be state significant, 56% regionally significant, and 41% locally significant.

On paper, this may look as though more than 40% of industrial land is available for mixed-use development, but these numbers are misleading – they relate to the proportion of precincts being designated, not the availability of or area of the land. The real proportions are 3,594 ha (16%) of industrial land will be state significant, 18,745 ha (81%) regionally significant, and 733 ha **(just 3%) locally significant**.

In other words, just two Centennial Parklands worth of industrial land can be used for mixed use development, according to the draft Sydney Plan. That is very disappointing.

While Urban Taskforce recognises the need for more industrial space and is calling for additional areas of land to be made available for this purpose, local requirements and context need to be brought into consideration.

For example, there are cases of HDA sites that are being declared as SSD for high density residential buildings which currently fall in the ‘regionally significant’ industrial land category. This policy position would automatically preclude their use for this type of development and could put at risk projects that have already been given in principle support by the Government. This needs to be addressed.

These old industrial sites have outlived their purpose and are justifiably being rezoned for alternative uses. For example, many of the former industrial lands in South Sydney are being transformed, because they are too costly and ill-suited for ongoing use as industrial property.

These sites are being given a new lease of life with mixed-use development bringing residential, commercial, and light industrial activities together in ways that add to the culture and amenity of these areas.

Rozelle Bay, a potential future growth area and part of the Bays West TOD, is another example of an area identified as regionally significant industrial land in the

draft Sydney Plan, despite considerable government investment in a Metro station in that area and known private sector interest in mixed use development. If residential development were not allowed in this location, it would undermine the current TOD designation and call into question the relationship between existing policies and the draft Plan.

Although the policy outlines a process for considering alternative uses in locally significant or limited regionally significant lands – strategic alignment, economic alignment, viability and connectivity, and public benefit, the policy defaults to the retention of industrial land when there is no sufficient justification for the alternate use, and the treatment of lands as regionally significant until the Department recategorises them.

Industrial land is in high demand, and it doesn't need to be protected.

As such, Urban Taskforce contends that mixed-use development should be an option for regional and local industrial lands.

At a minimum, land currently zoned as E3 (Productivity Support) should be considered locally significant and available for other uses, should the market demand it.

With that said, Urban Taskforce appreciates that this designation does not imply a right to residential or mixed-use development. What it does allow is a merit-based assessment on a case by case or application by application basis. This approach is sensible. It is important that some locally significant sites maintain their capacity to service the "last mile" logistics needs of e-commerce.

This is something that can be determined in consultation with industry, enabling those who are likely to require industrial space can inform the planning process.

The Employment Lands Development Program (ELDP) is a worthwhile initiative to manage the identification and supply of industrial lands, and it should be consulting with industry partners to inform its work and to protect both community and economic needs.

**Recommendation 3-1: That the State Government authorise the Employment Lands Development Program (ELDP) to revise the draft Sydney Plan to:**

- **Allow for mixed-use development on regionally and locally significant industrial lands;**
- **Reclassify any site declared by the HDA as SSD for residential development, or currently included within a transport-oriented development zone, as locally significant industrial land;**
- **Reclassify any E3 – Productivity Support zoned land as locally significant industrial land; and**
- **Allow for more land currently designated regionally significant industrial land to be deemed locally significant – thus allowing for a merit-based assessment on any mixed use or non-industrial land use proposal.**

### **Industrial planning should be an iterative process**

Urban Taskforce believes that the work of the EDLP should be an ongoing activity of DPHI, designating (and redesignating) viable lands as of need and opportunity.

Strategically located greenfield sites should be identified and designated on an ongoing basis in consultation with industry as the city continues to grow, to preserve them for industrial purposes.

However, departmental officers have advised that, once categorisation has occurred under the draft Sydney Plan, further amendments or reclassifications will not occur for at least two years. This is the cause of some concern and requires re-consideration.

The 2-year moratorium on change assumes that planners have already correctly identified the usefulness of different sites, without engaging with those who currently own them or those who can see their potential. Desktop analyses are notoriously unreliable.

This leads to incorrect designations – for example, an Urban Taskforce member has raised concerns about the zoning of sites in Kurnell Peninsula as regionally significant based on historical use, but environmental and indigenous cultural sensitivities mean that the sites may not be useable for general industrial purposes in the future.

While we appreciate that there has been some consultation with industry, classification based on engagement with landholders, who know the nature of their properties, rather than from reviewing existing maps, would provide better outcomes and ensure that land use can be appropriately determined.

Strategic rezonings, particularly as a result of industry applications, should be strongly considered on an ongoing basis if a sufficient business case can be proposed to support them.

Sites that offer significant potential, such as in the Wilton area, would easily be designated regionally significant, with the support of the landholders themselves.

The EDLP should constantly be engaging with government and industry to identify trends and needs, and the identification and classification of industrial lands should be an ongoing process, not set and locked in for two years.

**Recommendation 3-2: That the State Government authorise the Employment Lands Development Program to identify and classify industrial lands on an iterative basis, in consultation with landholders.**

### **Intensification of industrial sites could be detrimental**

Intensification, which is a key objective of the Statewide Policy, is not always a practical goal for industrial lands strategies.

Generally, the market is unwilling to support intensification, as it brings high construction costs and is impractical for many businesses in many locations.

Local councils undermine intensification efforts with tree canopy requirements and increased landscaping prescriptions, while increased transport movements from more intensive industrial use can add to local traffic concerns and conflict with local authorities.

When older industrial sites are redeveloped, these policies can lead to reductions in floorspace and building footprints, compared to the existing site, resulting in a net loss of productive capacity and creating a strong disincentive to invest in aging stock.

This reduces local industrial space, requiring businesses to find additional room elsewhere, and encouraging urban sprawl.

The Statewide Policy proposes restrictions on sites that, ironically, would make intensification impractical, including:

- zoning transitions to prevent encroachment by incompatible development;
- buffer zones;
- noise pollution mitigation; and
- environmental restrictions.

These restrictions, if implemented, would make intensification more complicated and reduce site utility. If these restrictions reduce the area's practical use as an industrial site, it could make it unproductive.

In addition, more intensive industrial use on local sites could lead to councils favouring office-based facilities over heavy logistics, making warehousing sites more expensive.

**Recommendation 3-3: That the State Government consult further over industrial land intensification goals to:**

- **Determine whether intensification is supported by industrial businesses;**
- **Review the impact of local policies on sites being redeveloped; and**
- **Ensure that brownfield industrial lands do not have to comply with policies that would reduce available floorspace or site utility.**

**Industrial lands should be “development ready”**

As with other greenfield sites, the zoning of industrial lands is only the first step in the process.

Infrastructure is needed for a site to be operational, with road, water, electricity, public transport, and other connections essential if a site is to be viable.

This is particularly important for the growing use of electric vehicles and robots on some warehousing sites and requires the timely rollout of supporting infrastructure.

Development approvals should distinguish between significant changes and minor alterations, with initiatives such as internal automation or mezzanine expansions being good candidates for treatment as complying development.

The urgency for new industrial lands means that the NSW Government will need to focus on helping sites to be development ready, so that new businesses can set up quickly and start contributing to the economy and local employment.

**Recommendation 3-4: That the State Government prioritise industrial land-enabling infrastructure to ensure that new sites are development-ready.**

**Open zoning should allow the market to decide what is needed**

As noted earlier, the Sydney Plan should be turning to open zoning to allow for greater flexibility with sites and to ensure that market forces, not planning principles, are driving activity.

Industrial land is in high demand, with near-zero vacancies in some areas, resulting in higher land values and rents.

While industrial sites need to be identified, in the context of electric vehicles and automation, many do not need to be protected from other uses.

If a landholder cannot make a particular site work as purely industrial land, then it would be for good reason in the current climate.

Allowing mixed-use development in such circumstances would prevent site dereliction and allow landholders to maximise the opportunities from their properties.

The vast majority of locations will not be affected by such an approach, because they are too valuable as industrial sites.

**Recommendation 3-5: That the State Government adopt open zoning principles to allow the market to decide the best use for individual industrial sites.**

## Appendix 4: The Draft Sydney Plan – Priorities

The priorities in the draft Sydney Plan provide a mission statement for planning but raise more questions about how they will affect housing delivery.

### Housed

Urban Taskforce welcomes the focus on housing in the planning documents and appreciates that it has been placed high on the list of priorities.

Nonetheless, the Plan still lists a vast array of “priorities” which are driving up the cost of the delivery of housing. This has two consequences. First, houses that are built are more expensive for purchasers. Second, many houses just don't get built because the projects are made unfeasible.

This is not clearly articulated in this plan and until it is, I fear that the cultural change that is required across the planning system, will not occur.

NSW is currently in the midst of a housing supply crisis that was exacerbated by the former 2018 Region Plan: “*Metropolis of Three Cities*”. If the housing crisis is to be resolved, several changes to regulations, taxes, and processes are urgently needed.

Put simply, barriers to development must be removed if the predicted 6.5 million residents of Sydney are to be housed.

Governments at all levels have applied a crippling array of taxes, fees, and charges that have added to the considerable cost of construction to make housing more unaffordable.

The 2024 Centre of International Economics report “*Cost and feasibility estimates for supplying new residential dwellings in New South Wales*”<sup>2</sup>, which was prepared for NSW Treasury, showed that the average cost for new mid-rise infill apartments in 2023 was \$905k.

The average sale price was \$885k.

The feasibility gap for these apartments dropped from +12% to -14% (that is negative 14%) between 2018 and 2023. No industry can consistently run at a loss and survive.

Feasibility must be a foundational consideration for the delivery of housing supply. It is an ever-present concern in the face of escalating controls and the apparent mania for affordable housing levies currently running through state and local governments. I do not feel that this draft plan reflects this omni-present imperative.

Many projects face “haircuts” from state and local officials that are designed to placate local objectors or perceptions of what is needed to secure social licence. The problem with this is that these changes can often push a project into a financially unfeasible state.

State Government expectations of housing capacity are often way off the mark once council planners have chipped away at proposals and forced modifications to the original applications, frequently making projects too hard and too costly.

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<sup>2</sup> <https://www.nsw.gov.au/sites/default/files/noindex/2025-09/cie-report-cost-and-feasibility-estimates-for-supplying-residential-dwellings.pdf>

According to the Housing Supply Dashboard, across Greater Sydney a total of 76,539 dwellings were granted a DA since 1 July, 2024. Only 46,926 dwellings received a construction certificate. Just 61.3%, assuming that numbers are constant.

In many cases, this is the result of the intervention by councils, the huge imposts placed on projects, restrictive conditions and development controls, and a lack of sufficient density to make a project feasible.

Put simply, developments do not proceed unless they are financially viable. The problem for the planning community is that they are now being measured by their performance in the delivery of completed dwellings (the Housing Accord Targets).

So, there is an implied obligation on planners to ensure project feasibility. This has recently been given further weight by the changes to the EP&A Act passed with bi-partisan support in late 2025.

There is no recognition given in the "Housed" priority to the importance of ensuring that conditions of consent deliver project feasibility.

Affordable housing is a key component of the "Housed" priority.

Perversely, the requirement for inclusionary zoning or in-perpetuity affordable housing "contributions" (they are nothing other than a tax on market housing supply) actually adds to housing development feasibility woes. This, as explained above, prevents the attainment of the Housed priority.

The detail within the "Housed" priority works directly against its attainment.

Some in the planning and social services community have latched onto the idea that affordable housing should be paid for by developers but seem wantonly oblivious to how that is ultimately funded and its impact on overall housing supply.

Affordable Housing contributions that are not backed with substantial increases in height and density (yield) are the housing equivalent of robbing Peter to pay Paul. With construction costs as high as they currently are, even these height and density bonuses cannot pay for in-perpetuity contributions.

Without incentives, such as the those included in the successful Housing SEPP's Infill Affordable Housing Bonus Scheme, the delivery of affordable housing becomes a straight cost to a project. A 3% levy on 100 apartments, assuming a sale price of \$1 million per apartment, to deliver in perpetuity housing would add \$31,900 to the price of the other 97 apartments.

Obviously, that rises with the level of the "contribution" applied.

If housing is barely feasible under existing controls, an affordable housing levy is likely to kill a project outright. No construction means no additional market supply nor any extra affordable housing, which means that housing costs go up.

So, what started as an altruistic policy initiative to help those in housing stress rapidly increases the number of people who need support.

**Recommendation 4-1: That the Priorities in the draft:**

- **reduce or abolish taxes, fees, and charges for housing developments; and**
- **work with local councils to develop incentive-based, time limited, affordable housing policies.**

## Prosperous

Mixed-use development, emphasised within a centres policy, must be a feature of the Sydney Plan, allowing the colocation of housing with commercial and industrial properties.

This will ensure that communities don't become ghost towns after 5pm, that restaurants, cafes, and bars can operate when customers want their services, and that people can live closer to where they work and play, particularly in CBDs.

Zoning should be open and flexible, so that the market has more of a say in what is delivered, and the needs of the community are met.

**Recommendation 4-2: That the State Government emphasise the importance of mixed-use development and open zoning as part of a centres policy to deliver the types of development that meet community needs.**

## Connected

Urban Taskforce supports the delivery of housing and jobs near transport networks.

However, while some transport-oriented development has been successful to date, there are challenges in other locations.

For example, in Macquarie Park there is a proscription against residential development within the commercial core except for build-to-rent projects.

This ignores the ideal location of the precinct between three Metro stops, and the benefits that residential development would provide to amenity and project feasibility.

While the NSW Government's Sydney Plan emphasises connectivity with transport networks, it allows this to be prevented through these type of zoning restrictions that actively undermine the potential for connectivity.

Greater flexibility is needed to facilitate the delivery of the homes, commercial facilities, and industrial lands sought by the Greater Sydney community.

The proposed centres policy should emphasise the need for more transport-adjacent centres and the need to accommodate all land uses, rather than picking and choosing winners.

**Recommendation 4-3: That the State Government revise transport-oriented development policies to allow for more mixed-use development in TOD locations.**

## Resilient

While Urban Taskforce supports biodiversity, the current system needs to be made more certain. Existing processes result in developers requiring a multitude of reports, each of which could result in further requests for information and a greater risk of rejection.

Land deemed undevelopable must be compulsorily acquired at a market price to ensure that a landowner does not suffer detriment at the hands of government decision-makers.

At the same time, while the Government is discussing the need to assess and mitigate the risk of natural hazards, and spruiking LMR as a possible solution, there is an urgent need for greenfield development.

Planning in flood zones should be sensible and practical – 1-in-100-year benchmarks should be applied, and likely outcomes, rather than worst-case scenarios, used to assess appropriateness.

Sydneysiders will never be fully protected from all risks, and it is not the planning system's responsibility to do so. Development should not be stopped based on unlikely hypothetical scenarios.

### **Recommendation 4-4: That the State Government:**

- **simplify biodiversity compliance requirements;**
- **commit to compulsory acquisition of undevelopable land; and**
- **adopt 1-in-100-year benchmarks as the standard for planning in flood zones, tested using realistic scenarios.**

## Liveable

Urban Taskforce recognises the desire to ensure that there is sufficient open space for new residents within a community.

This entire priority area is nothing but meaningless virtue signalling. The housing market demands liveable communities and our members deliver them. There is no legitimate role here for planners.

The Sydney Plan would benefit from a new set of metrics used to calculate open space requirements. They should include all open space within an area, not just that in the immediate precinct and they should include regional parkland, state forests, national parks. Use "person in the street" definitions of open and green space, not manufactured concoctions designed to increase costs and frustrate development.

Landholders need to be fairly treated. If a site is rezoned for public open space, the landholder shouldn't see the value of their property reduced. Property owners should be compensated as if their land were developable at the value of the prior zoning, not based on the value of the land as open space following council rezoning.

**Recommendation 4-5: That the draft Sydney Plan Priorities:**

- **be amended open space requirements to determine if they are realistic for higher density communities;**
- **be amended to require RPAs to consider all green and open space in the region (not just the precinct), including regional parkland, state forests and National Parks**
- **require councils rezoning land as open space to compensate the landholders for the highest value of their land as if it were developable, not for its value as open space.**

**Coordinated**

Urban Taskforce agrees with aligning infrastructure with development.

But infrastructure is not being delivered by the NSW Government at anywhere near the levels it needs to be to make greenfield sites developable. This, in turn, is having a massive impact on housing supply and is causing families who want to live in free standing houses to leave our state.

The Commonwealth and NSW Governments need to provide more support housing enabling infrastructure in greenfield areas.

The release of the Infrastructure Opportunities Plan is a positive sign that the State Government is seeking to roll out infrastructure in line with growing need, but it will require constant monitoring to ensure that delivery supports greater housing supply.

There should also be a sense of fairness and equity in this – established areas did not have to pay for the infrastructure servicing their communities, new suburbs should equally be subsidised for the infrastructure that will support them.

**Recommendation 4-6: That the State Government investigate ways to subsidise infrastructure delivery in growth areas so that the costs don't fall completely on new homebuyers.**

## Appendix 5: The Draft Sydney Plan – Responses

### 1: Implement Sydney housing targets

Urban Taskforce Australia strongly supported the National Housing Accord targets when they were introduced and agrees that the Sydney Plan should codify these targets.

However, the Sydney Plan uses the existing Accord targets up to June, 2029, which means that 40% of the target period will have passed before the plan goes live.

Metropolitan councils are well behind the Housing Accord targets. Only three councils in the Greater Sydney area have exceeded their pro-rata housing targets to date – Canada Bay, Hawkesbury, and Burwood. Blue Mountains currently falls just behind its target.

In comparison, 15 councils have achieved less than 50% of their targets to date, 8 of which are less than 40% of their targets.

If the Sydney Plan only relies upon the Housing Accord targets, it will start from a position of disadvantage, with many communities having little hope of catching up.

To overcome this, the Government should seek to develop new targets that cover a 10-year period going forward from the commencement of the Plan, adjusted after six or seven years to reflect any improvements within that period.

This will allow some alignment with the targets used in council local strategic planning statements and local housing strategies, which currently do not match the Accord.

These new targets should set a clear minimums, but not be allowed to serve as a maximum, and councils that exceed their targets by 20% or more should be given incentives.

Performance for all councils should be publicly reported through a housing approvals tracker.

This should be matched with a greater level of enforcement and sanction to deal with those councils that have demonstrated a willingness to frustrate the objectives of State Government housing policy.

Even where consent is given, feasibility is an ongoing problem. Planners can assist with feasibility by prioritising housing supply per se.

Landcom's recent decision to exit some of its western Sydney projects because of project feasibility concerns shows the difficulty in delivering housing in some parts of Sydney when feasibility cannot be assured.

**Recommendation 5-1: To facilitate delivery against the new housing targets, the Sydney Plan should be amended as follows:**

- **Both Housing Accord Targets and ten year Targets should be codified;**
- **To speed up the planning system and reduce costs associated with planning assessment, planning documents should be simplified and the level of reporting (including for SSD) reduced. This should be written into the Actions and responses;**
- **The Sydney Plan should explicitly contemplate councils assessing and determining rezoning applications more quickly and easily, particularly in areas where the regional plan identifies a need for further growth.**

**Actions:**

1.1	Develop and implement a revised housing supply and diversity monitoring framework – 2026–27 (NSW)	Support. This should be done in collaboration with the development sector.
1.2	Continue to investigate and implement new statutory provisions to fast track assessment of Council-led housing proposals – 2026+ (NSW)	Support. This should be done in collaboration with the development sector.
1.3	Lead planning interventions to increase housing supply if Councils fail to meet housing target requirements – 2026+ (NSW)	Support. More enforcement is needed to deal with direct council opposition to the NHA targets.
1.4	Review and update local strategic planning and local environmental plans to align with the Sydney Plan and provide sufficient feasible capacity to meet housing targets – 2027+ (Councils)	Support. The NSW Government needs to fund this work, so that it doesn't draw resources away from development assessment functions.

**2: Increase housing diversity and choice**

While housing diversity and choice are recognised as an important goal, the delivery of State Government policies such as LMR and TOD are being hamstrung by councils using "housing diversity and choice" as a fig-leaf for simply opposing housing types that they do not like. Randwick Council recently trotted out this line in its efforts to oppose student accommodation and co-living in Randwick in a staggering slap down of the tremendous contribution to the community made by students attending UNSW and living in the Randwick LGA.

Potential construction sites in LMR designated areas face competition for land, higher costs, and an array of exclusions that reduce capacity to build.

Anti-development elements actively seek to undermine goals to satisfy local political objectives through DCP restrictions and heritage listings.

The planning for residential development is highly regulated, and market demand is often subverted by artificial dwelling mixes, carparking restrictions, and controls on building shape, size, and form.

Yet, opportunities around transport hubs, as demonstrated by higher-density development plans in places like Canterbury-Bankstown or in the TOD areas of Kuring-gai, show the potential of these government policies.

Impacts on dwelling size and amenity of requirements in the Apartment Design Guide need to be investigated, as these can result in smaller apartments through solar and other controls, which may be less attractive to homebuyers.

**Recommendation 5-2: To deliver a better mix of dwellings that meets community needs, the State Government should:**

- **conduct a residential zone review similar to the one performed in Auckland; and**
- **review the Apartment Design Guide regarding solar access to enable greater flexibility in this area, reduce the ADG’s complexity, allow for smaller, more affordable apartments.**

**Actions:**

<p>2.1 Review development standards for dual occupancy development to establish a consistent approach across NSW – 2026 (NSW)</p>	<p>Support.</p>
<p>2.2 Complete master plans and State-led rezoning precinct studies for priority Metro West, Sydney Metro – Western Sydney Airport, Stage 2 light rail and rapid bus networks – 2027–28+ (NSW)</p>	<p>Support – but Masterplans need to be “light touch” to allow for modifications and amendments that occur as a result of changes in the market in the time between when they are completed and the projects are delivered. The light touch masterplans need to be done as a priority, to identify attractive residential development prospects. Where this is the case, they should be progressed with urgency.</p>

<p>2.3 Investigate planning control incentives relating to housing diversity and requirements for family-friendly apartments in mid and high-rise residential development – 2026 (NSW)</p>	<p>Needs review. Incentives for family-friendly apartments would be welcome, but the State Government needs to make sure that it is not requiring dwelling types at levels that are not being sought by homebuyers. Generally, we say let the market decide. The development community is backed by a veritable army of real estate agents. We get firsthand feedback every day of demand for housing types. That said, incentives are always welcome.</p>
<p>2.4 Update guidance to consent authorities, industry and the community to make sure the Apartment Design Guide is being used flexibly to achieve positive objectives evaluated through merit assessment – 2026 (NSW)</p>	<p>Support. The ADG needs to account for flexible modern approaches and not deliver prescriptive outcomes. An understanding of its "Guideline status" is critical.</p>
<p>2.5 Investigate further opportunities for low rise attached housing – 2027 (NSW)</p>	<p>Support. The investigation needs to look into active subversion of existing LMR policy by councils, or future housing proposals will fail. The LMR should be expanded to include all stations, centres and transport nodes.</p>
<p>2.6 Review local environmental plans, local contribution plans and development control plans relating to Low and Mid-Rise Housing Areas designated under the Low and Mid-Rise Housing Policy – 2026 (Councils)</p>	<p>Support. Most councils will not comply with these timeframes, and the State Government will need to direct this activity.</p>
<p>2.7 Identify areas outside Low and Mid-Rise Housing Areas that can accommodate more diverse housing choice based on public transport connections to stations – 2026–27 (Councils)</p>	<p>Support. This must be State Government led, or it will not happen.</p>
<p>2.8 Review minimum lot size requirements for dual occupancies outside Low and Mid-Rise Housing Areas – 2026–27 (Councils)</p>	<p>Support. Councils should be required to review minimum lot sizes and permissibility for all missing middle typologies and secondary dwellings. They should also be given targets to transition more R2 land to R3 zoning.</p>

<p>2.9 Consider more ways to provide high density development around stations and other transit hubs, where appropriate and feasible – 2026–27 (Councils)</p>	<p>Support. This must be State Government led, or it will not happen.</p>
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### 3: Secure the supply of affordable housing

The spread of mandatory affordable housing contributions across all areas of Sydney is making this look more and more like a tax. Housing density is increasing to accommodate demand for housing supply after years of inadequate planning constrained that supply.

While some requirements are manageable if sufficient uplift is allowed (eg. The infill affordable housing bonus provisions of the Housing SEPP), projects can quickly end up becoming unfeasible if consent authorities reduce the number of apartments or height that can be delivered, or apply an in-perpetuity affordable housing contribution..

In many cases, significant uplift is required just to make the project feasible in the first place. This is because of the massive rise in construction costs during and since the COVID pandemic period. Adding an affordable housing levy on the top can kill feasibility.

The affordable housing drive is largely philosophical, based on erroneous assumptions on a developer's capacity to pay and ignoring the high likelihood that costs will be passed on, making housing less affordable for those who are seeking to purchase.

If affordable housing levies are applied without any recognition of their impact on feasibility or the context of the project, they could threaten projects and cause construction not to occur, meaning that no housing – affordable or otherwise – will end up being built.

In the middle of a housing supply crisis, this is a self-defeating exercise.

Apartments are already not feasible west of the "Latte-line" in Sydney without any affordable housing levy. Including one will result in a dearth of supply and increased housing costs – already the number one driver of inflation and interest rate rises.

For some councils, the development deterrence represented by affordable housing levies is a feature, not a bug. It allows those councils to virtue-signal about housing lower socio-economic families, while satisfying anti-development rate payers by stopping projects.

Studies used to prove feasibility of affordable housing rates (even those commissioned by DPHI in the context of TODs) often use flawed reasoning, or uninformed desktop analysis. They underestimate construction costs and developer margins (required by financiers to match risk), while over estimating home buyers' willingness to pay.

Locking in poor levy-based systems will not deliver more affordable housing, but it will reduce the amount of market housing developed.

As noted above, where affordable housing has worked is with incentive schemes, such as the Infill Affordable Housing Bonus Scheme. These work because they allow

developers to offset costs and to minimise any financial impacts. Incentive-based schemes, where applicants can manage the risk to their bottom line, are the only viable options for the effective delivery of affordable housing.

Outcomes-based models, where developers retain ownership and can decide whether to deliver affordable housing dwellings on site or in a different location, give applicants flexibility and make affordable housing.

**Recommendation 5-3: The State Government should investigate alternatives to current affordable housing policies that deter development, and look at creating an outcomes-focused, incentives-based policy.**

**Actions:**

<p>3.1 Deliver an Affordable Housing Contribution Scheme toolkit to support Councils to fast-track the preparation and adoption of an affordable housing contribution scheme – 2026–27 (NSW)</p>	<p><b>Opposed.</b> More consideration needs to be given to feasibility, but the drive for mandatory affordable housing contribution schemes will ignore that in order to apply a standard levy. All duplication between SEPP based Affordable Housing obligations and LEP based obligations should be eliminated. If this is to proceed, DPHI must take a strong hand in guiding the outcomes and limiting Council's capacity to kill off housing supply by mis-using affordable housing levies to make new housing projects unfeasible.</p>
<p>3.2 Maximise the affordable housing outcomes delivered under Transport Oriented Development and infill affordable housing programs by creating more flexible arrangements for contributions – 2029 (NSW)</p>	<p>Support. The infill affordable housing bonus scheme should be the model for all policies.</p>
<p>3.3 Prepare and adopt an affordable housing contribution scheme – 2027 (Councils)</p>	<p><b>Oppose.</b> Unless a council scheme is based on incentive options with contributions made for a limited period of time similar to that initiated by the NSW Government in late 2023 through the Housing SEPP amendments aforementioned, it will deter development.</p>

<p>3.4 Identify surplus Council-owned land for affordable housing – 2027 (Councils)</p>	<p>Agreed. Councils should be using their own assets to support their affordable housing targets. However, the feasibility issue impacts on all developers, including Landcom, which recently withdrew from the development of 1500 apartments in Western Sydney because of concerns over housing development feasibility.</p>
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#### 4: Grow well-located jobs

The Plan seeks to encourage jobs in areas with access to public transport, although industrial lands will be an exception. However, the response is very high level and there is not a lot of clarity around how the goals will be translated into practical results and a council level.

The delivery of a centres policy will provide clarity about mixed-use development, and areas that used to be separated from residential, such as retail locations, are now being recognised as practical solutions for infill development.

Councils need to move away from isolating employment and residential lands from each other, and recognise that both are needed to deliver successful communities, particularly in TOD precincts.

The State Government needs to flesh out its transport strategy to create more centres that can deliver housing and employment options.

**Recommendation 5-4: The State Government should finalise the centres policy and create incentives for councils to consider more mixed-use development.**

#### Actions:

<p>4.1 Finalise the centres policy including guidance on mixed-use or residential zoned land in and around a commercial core – 2025–26 (NSW)</p>	<p>Support. The centres policy will be an essential component to delivering mixed-use, attractive residential properties close to jobs and amenities. It is critical that high density residential development is encouraged in all Centre types, including CBD core areas.</p>
<p>4.2 Review and update employment zone planning policy for centres 2025–26 (NSW)</p>	<p>Support. This should be part of the centres policy.</p>

<p>4.3 Review and update planning controls for E1 and E2 zones within the identified Low and Mid-Rise Housing Areas to increase floor space for goods and services to meet the needs of new residents and to consider shop top housing – 2027 (Councils)</p>	<p>Support. This should be State Government-led, and should look at ways to encourage higher density options for E1 and E2 zones.</p>
<p>4.4 Investigate and implement revised statutory provisions to enable new jobs in and out of centres, including responding to infrastructure availability – 2026+ (Councils)</p>	<p>Support. This should be State Government-led.</p>

## 5: Align infrastructure to planned growth

Timely infrastructure delivery is important. The release of the Infrastructure Opportunities Plan (IOP) bodes well for the State Government's thinking about delivering supporting infrastructure.

However, there is still a significant cost borne by home buyers for infrastructure, particularly in greenfield sites, that penalises those moving into less established communities. Further, the consultation process through the UDP has been poor, resulting in many smaller, lower profile projects being left off the IOP list. This requires immediate attention lest the entire process lose industry support.

S.7.11 developer levies, s.7.12 levies, and H&PCs add significantly to the cost of new homes, and leave purchasers subsidising those who already own their properties. New home owners will be effectively subsidising amenity improvements for the rest of the community, while pushing up the cost of those new homes.

The IOP needs to be focused on infrastructure that is housing or industrial/employment enabling, and not just projects that would be "nice to have". For example, the recent growth in active transport infrastructure is an example of the very worst indulgence of costly but unnecessary "nice to have" amenity. Active Transport infrastructure should be paid for through recurrent council rates.

Commonwealth investment is also needed to help to create new communities without overtaxing the new residents.

### **Recommendation 5-5: The Responses to the Priorities in the Sydney Plan should be amended:**

- **Focus fees and charges on essential infrastructure; and**
- **Clearly identify areas where the Commonwealth Government should increase its investment in housing related infrastructure, to facilitate development.**

**Actions:**

5.1 Develop and annually update the Sydney Infrastructure Opportunities Plan – Ongoing (NSW)	Support. Given the low level of consultation with the development community to date, this should be done more often than just yearly. This is a helpful tool for identifying priorities.
5.2 Publish best practice guidance for Councils when planning for and providing local infrastructure – 2026–27 (NSW)	Support.
5.3 Use UDP and ELDP data to inform infrastructure planning at the local level – 2026+ (Councils)	Support. Infrastructure proposals should be for necessary infrastructure, not “nice-to-haves”.
5.4 Regularly review infrastructure contributions plans to reflect infrastructure priorities and staging through the UDP and ELDP – Minimum every 4 years, aligned to Council delivery programs (Councils)	Support. This should be carried out more frequently, due to the impacts on housing supply, and should be completed under the watch of the State Government.
5.5 Review infrastructure schedules to reflect land use planning directions and current works and land acquisition costs – Minimum every 2 years from 2026 (Councils)	Support. This will require State Government oversight.
5.6 Identify specific planned infrastructure works to be delivered within Council delivery programs and operational plans – 2026+ (Councils)	Support. This will require State Government oversight.

**6: Create a more vibrant Sydney**

The Plan looks to support social, cultural, and economic activity, but also built, natural, and cultural heritage. These activities should be voluntary, not mandatory costs applied to the development sector. Further, these matters should be funded by Council rates or consolidated fund allocations, not developer levies.

The focus on vibrant, integrated communities works well with mixed-use zoning, allowing residents to live near where they work, and preventing centres from becoming ghost towns after 5pm. A focus on achieving this result by removing planning controls would be very welcome.

However, the Plan needs more information about night-time transport, to accommodate late night activities.

If people cannot travel safely at different hours of the night, it will curtail any night-time activities.

**Recommendation 5-6: The State Government should ensure that increased activity at a precinct level does not come at the cost of new home buyers, and that adequate transport is provided to support late night activity.**

**Actions:**

<p>6.1 Activate key arts and entertainment precincts, and promote cultural institutions, state-owned performance venues and cultural festivals through flexible zoning controls, active street frontage requirements and expedited planning pathways – 2026–29 (NSW)</p>	<p>Support in principle, but this should not be funded by housing development.</p>
<p>6.2 Consult with Councils and communities to establish special entertainment precincts where appropriate in State-led rezonings and state significant development – 2026–29 (NSW)</p>	<p>Support in principle but this should not be funded by housing development.</p>
<p>6.3 Establish special entertainment precincts where appropriate to accommodate critical community, arts, cultural and retail uses as part of Council-led precinct planning – 2026–29 (Councils)</p>	<p>Support in principle, but this should not be funded by housing development.</p>

**7: Grow and connect public open space**

The Plan aims to increase open space, particularly in areas where there is higher growth and less available open space.

This is based on concerns about “inequity”. However, there needs to be a review of open space requirements and how these areas are used.

Requiring open space amounts in order to hit arbitrary benchmarks, without having clear studies supporting the desired levels, adds to the cost of construction without demonstrating a clear need.

A new study should also identify what sort of space is needed – is it just open space, or does it include community centres, libraries and the like.

In recent months, councils have put out extensive infrastructure wish lists with an array of “open space” requirements and a total bill of hundreds of millions of dollars. Worse, they do not consider open space in the adjacent precinct that is used by the population of their own Council, nor do they consider regional or national parks.

Clearer guidelines are needed to ensure that developers are not just seen as convenient sources of council revenue.

Otherwise the cost to the home buyer will become untenable, and projects will not proceed.

**Recommendation 5-7: The State Government should conduct a new study of open space and community facility requirements to determine what is necessary and what cost is reasonable for infill and greenfield communities.**

**Actions:**

7.1 Review and refine the identified network of high priority blue-green grid corridors – 2026–29 (NSW)	Limited support. This is a legacy hangover from the GCC. It has little value other than being a concept-design on a map. This network sits at the bottom end of the infrastructure priority needs list for new housing supply.
7.2 Deliver projects and programs to create or expand metropolitan public open space – 2026–29 (NSW)	Limited support. A study is needed to determine what level of open space or community amenity is reasonable.
7.3 Provide open space provision guidance and targets – 2026–27 (NSW)	Limited support. A study is needed to determine what level of open space or community amenity is reasonable.
7.4 Review Councils' existing and future open space provision and identify local opportunities to align with NSW Government's open space outcomes – 2027–29 (Councils)	Limited support. A study is needed to determine what level of open space or community amenity is reasonable.

**8: Secure an ongoing pipeline of productive industrial lands**

This has largely been covered by Appendix 3, which looked at the Statewide Policy on Industrial Lands.

“Employment land” has been used as a proxy for “industrial land”, but these are not the same, and could create confusion with E1 and E2 employment land, which is retail or commercial. If it is to be useful for councils in developing their own local strategies, the final Sydney Plan needs more detail, guided by the Statewide Policy.

As noted earlier, there needs to be greater application of the “locally significant” designation to industrial lands, so that more mixed-use development can be created, and lands that have ceased to be of use can be rezoned.

Only 3% by area will be deemed “locally significant” under the current plan, which means that the vast majority of industrial land will never be able to be used for alternative forms of development.

The conservative approach of labelling most industrial land as regionally significant applies a rigidity to industrial land classification that is not warranted.

**Recommendation 5-8: The State Government should designate more industrial land as “locally significant” to allow more flexibility in zoning and use.**

**Actions:**

8.1	Investigate interventions to support the intensification of significant industrial lands – 2026 (NSW)	Limited support. There is a very real risk that intensification could make some existing industrial land unattractive to clients and unable to be redeveloped.
8.2	Update the Employment Lands Development Monitor to align with categorisation – 2026 (NSW)	Support.
8.3	Review the industrial lands categorisation every 2 years From 2027 (NSW)	<b>Oppose.</b> Categorisation should not be frozen for two years, but should be moveable and flexible, so that opportunities can be capitalised on as soon as they arise.
8.4	Identify potential new industrial land – 2027 (NSW)	Support.
8.5	Publish Sydney's priority employment areas and investment program – 2026 (NSW)	Support.
8.6	Track the supply pipeline to support timely investment and rezoning decisions – 2026+ (NSW)	Support. It is not clear how this can occur if categorisation is only carried on every two years.
8.7	Review locally significant industrial lands in line with the draft statewide policy and incorporate into future local planning – 2026+ (Councils)	Support. But more locally significant industrial lands should be identified.
8.8	Update local zoning of industrial lands to be consistent with the statewide policy – 2026–27 (Councils)	Support. But more locally significant industrial lands should be identified.

**9: Minimise the impact of natural hazards to communities**

A risk-based approach to natural hazards is sensible, but the current tendency of the State Government is to take a conservative benchmark for flooding and to assess worst-case scenarios, regardless of how likely they may be.

Government cannot mitigate all risk, and planning should not be dominated by emergency services conservatism.

1:100 (plus free board) metrics need to be retained as the benchmark for planning, rather than going to 1:500 or 1:10,000 metrics. Otherwise there is a risk that many areas of Sydney would be undevelopable.

Councils need to invest more in risk mitigation measures, like improved drainage, sea walls, escape routes, warning systems to support growth.

**Recommendation 5-9: The State Government should ensure that the 1:100 benchmark for flood planning is retained, and that councils invest more in risk mitigation.**

**Actions:**

9.1	Implement relevant land use planning directions outlined in the Hawkesbury-Nepean Valley DAP – 2026–27 (NSW)	Support.
9.2	Develop and release guiding principles for building back better after natural disasters – 2026 (NSW)	Support.
9.3	Develop and release resilience assessment package to support building resilient communities and guide the considerations of natural hazard risk in settlement planning – 2026 (NSW)	Support.
9.4	Develop and release guidance for considering tolerable natural hazard risk in planning decisions – 2026 (NSW)	Support.
9.5	Review hazard studies using up-to-date, local place-based data on current and future exposure and vulnerability to hazards to inform land use and infrastructure planning decisions – 2026+ (Councils)	Support.
9.6	Relevant Councils to implement coastal management programs and associated planning actions – 2026+ (Councils)	Support.
9.7	Relevant Councils to prepare DAP implementation plans that outline how the Hawkesbury Nepean Valley DAP will be implemented through local strategic planning – 2026–27 (Councils)	Support.

**10: Sequence planned growth in greenfield areas within the urban footprint**

NHA targets cannot be the benchmark for the Sydney Plan, given that 40% of the Accord period will be over by the time the Plan is launched.

New 10-year targets should be developed to guide development beyond 2029.

**Recommendation 5-10: The State Government should develop 10-year housing targets for Sydney councils.**

**Actions:**

10.1 Develop a medium-term sequencing plan for greenfield precincts in Sydney – 2027–28+ (NSW)	Limited support. 10-year housing targets should be developed for every council area across Sydney.
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**11: Manage land uses beyond the urban footprint**

The Plan will protect productive uses of rural and conservation areas outside the urban footprint from urban encroachment, for agriculture, mining, logistics, tourism, and critical infrastructure such as waste and recycling.

**Actions:**

11.1 Undertake a Sydney rural lands study to map productive uses, critical infrastructure and important supply chains beyond the urban footprint – 2026–27 (NSW)	Support.
11.2 Investigate planning policy interventions to increase the productivity of rural lands including through agribusiness innovations, diversification and the inclusion of new productive uses – 2027–29 (NSW)	Support.
11.3 Finalise the urban footprint mapping and associated strategic policy – 2027 (NSW)	Support.
11.4 Relevant Councils to review the interface between the urban and rural lands to inform the urban footprint – 2026 (Councils)	Support.

**12: Protect and enhance the natural environment**

Requirements for tree canopies are supported in principle, but such policies should not be allowed to reduce building envelope allowances for the redevelopment of existing buildings.

The proposed greening guide should outline opportunities across the different urban landscapes in Sydney, also acknowledge the likely costs of tree planting and maintenance, and identify who bears the cost in each context. The reason for this is that some councils have no problem requiring large canopy trees on private property (arguing they are needed to meet their targets) while at the same time replacing large trees on public land with easier to manage smaller options.

**Recommendation 5-11: The State Government should clarify responsibilities for providing and maintaining tree canopies.**

**Actions:**

12.1 Update tree canopy capture data and mapping for Sydney – Every 2 years (NSW)	Support.
12.2 Develop an urban greening guide for Sydney – 2026 (NSW)	Support. More detail will be required.
12.3 Develop locally appropriate canopy and greening targets – 2026–30 (Councils)	Support. Canopies should not be allowed to reduce existing building envelope allowances for redevelopments.