

LGNSW SUBMISSION

THE SYDNEY PLAN

FEBRUARY 2026



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Recommendations

Recommendations

Recommendation 1:

That the NSW Government publicly exhibit the draft State Land Use Plan prior to finalising the Sydney Plan to allow councils and communities to review and comment on how statewide priorities and long-term infrastructure commitments will be applied in practice.

Recommendation 2:

That the draft Sydney Plan be revised to include a forward-looking strategic vision that explores multiple growth trajectories and considers a direction of 20 years and beyond for land use and infrastructure that will enable councils to undertake evidence-based updates to local plans with greater certainty.

Recommendation 3:

In response to the 'Connected' and 'Coordinated' priorities, the Sydney Plan should be expanded to include well-defined commitments across the full range of essential infrastructure and agency responsibilities - including transport, utilities, waste, health, education, environmental, heritage, sustainability and social infrastructure - and clearly set out how land-use outcomes align with existing, committed and future infrastructure networks.

Recommendation 4:

That the NSW Government invest in a publicly accessible, centralised dashboard that consolidates all related infrastructure and servicing plans to improve transparency and demonstrate integration across agencies.

Recommendation 5:

The DPHI adjust key timeframes to stagger or reprioritise actions in line with the advice provided by councils, to ensure realistic and achievable implementation timeframes.

Recommendation 6:

That the NSW Government commit targeted funding to support councils in delivering the Sydney Plan, including:

- A \$33 million, two-year program for strategic planning and evidence-based studies (Responses 1 and 2).
- A two-year program to accelerate implementation of Affordable Housing Contribution Schemes (Response 3).
- A multi-year program to support timely review of local industrial lands strategies and zoning (Response 8).

Recommendation 7:

That the Sydney Plan be revised to embed policy settings for implementing affordable housing targets to signal the NSW Government's commitment to delivering measurable affordable housing supply and provide much needed certainty for stakeholders.

Recommendation 8:

The Sydney Plan should broaden the remit of the UDP to ensure waste infrastructure is included in the planning and sequencing of essential infrastructure for growth.

Recommendation 9:

The Sydney Plan should be amended to include an action for NSW Government to liaise with the Environment Protection Authority (EPA) to plan for the long-term waste management and recycling solutions for Sydney and incorporate waste controls into planning reforms.

Recommendation 10:

The State Plan should recognise and plan for an integrated, citywide open space and blue-green grid network as essential infrastructure, supported by a strategic, evidence-based framework based on current and future community needs across all public open space and social infrastructure types.

Recommendation 11:

Update, correct and correlate NSW Government mapping datasets between state agencies, local government areas and the Sydney Plan to produce a consistent base from which to work.

Recommendation 12:

That DPHI provides clarity on how the planning reforms relate to the new strategic framework and how the Sydney Plan will be used to provide context, guidance or criteria that supports a rigorous or transparent merit assessment for the purposes of the HDA process and TAD pathway.

Recommendation 13:

The NSW Government should clearly identify and commit to measuring outcome-based performance indicators linked to each Plan priority, supported by defined accountabilities for both State agencies and councils. This must include a refined and transparent scope for future Plan reviews.

Recommendation 14:

The NSW Government should invest in an enhanced housing dashboard to improve monitoring and reporting of housing outcomes with transparent, timely data on housing diversity, availability, affordability and specific tracking of affordable housing and net new dwellings.

Opening

Local Government NSW (LGNSW) welcomes the opportunity to provide its views to the NSW Department of Planning, Housing and Infrastructure (DPHI) on the draft Sydney Plan (the draft Plan).

The Plan is presented as a 20-year strategic land use plan for the Sydney region covering 33 local government areas (LGA), shaped by seven statewide priorities and supported by a suite of technical appendices for implementation. The exhibition material notes Sydney is projected to reach 6.5 million people by 2045, underscoring the need for a plan that provides certainty on where and how the forecast 23% increase in growth will be delivered and resourced.

With the aim of the draft Plan *“to make Sydney a great place to live, work and enjoy now and into the future”*,¹ the 33 Sydney councils all have a fundamental role to play. Councils support the NSW Government’s intention to set a clearer strategic direction for Sydney’s growth to align housing, jobs and infrastructure but have sought greater clarity and detail in the draft Plan about its vision and growth sequencing.

DPHI describes the draft Sydney Plan as the first of a “new generation of regional strategic plans” in the NSW Government’s new strategic planning framework². The new framework deliberately casts the state and region plans as land-use-only plans, deferring to “other NSW Government infrastructure and servicing plans” to provide the infrastructure direction. In responding to the new framework, consistent themes for councils include genuine collaboration; timely and transparent infrastructure sequencing; fit for purpose local infrastructure funding; and local flexibility within a clear regional framework.³

LGNSW supports the NSW Government releasing the long-awaited regional plan for Greater Sydney to set a future direction for land-use as a fundamental step to addressing the key growth challenges and infrastructure investment decisions that Sydney is facing now and into the future.

This submission highlights key areas where councils have expressed concern and/or sought clarification on the package of exhibited documents. It is informed by the policy positions of LGNSW and consultation with councils of the greater Sydney region.

This submission was endorsed by the LGNSW Board in April 2026 .

¹ [The Sydney Plan | NSW Planning Portal](#)

² [A New Approach to Strategic Planning: Discussion Paper | Planning Portal - Department of Planning and Environment](#)

³ Refer to LGNSW’s submission on the *New approach to strategic planning: Discussion paper*

Background

The draft Sydney Plan is part of a suite of three strategic planning documents concurrently on exhibition as part of the NSW Government's new approach to strategic planning across the state:

- ***A New approach to strategic planning: Discussion paper*** proposes a three-tiered strategic planning framework and introduces a new State Land Use Plan and 7 statewide priorities to guide land use planning across NSW.
- **The Sydney Plan** is the first of the new regional strategic plans in the proposed framework and is being positioned to demonstrate how the new statewide approach will be applied at a regional scale.
- **The Draft Statewide Policy for Industrial Lands** outlines how industrial lands will be planned, managed, and categorised in NSW.

LGNSW has provided separate submissions on each of these proposals.

The Sydney Plan applies the NSW Government's proposed new statewide approach outlined in *A New Approach to Strategic Planning: Discussion Paper*, and is accompanied by exhibition documents including:

- Appendix B (Summary of Actions)
- Appendix C (Glossary)
- Appendix D (Pipeline of State Rezoning)
- Appendix E (Jobs guidance)
- Appendix F (Public open space provision)
- Appendix G (Blue-green grid)
- Appendix H (Sydney industrial lands categorisation)
- Appendix I (Flood planning principles)
- Appendix J (Urban footprint policy guidance)

Once finalised, the draft Plan will replace the 2018 *Greater Sydney Regional Plan - A Metropolis of Three Cities* and district plans⁴.

While the State Land Use Plan sits above the draft region plan for Sydney, the release of the plan for Sydney pre-empts the statewide plan, which is yet to be made available for review. Before finalising the draft Plan, the NSW Government should publicly exhibit the draft State Land Use Plan to allow councils and communities to review and comment on how statewide priorities and long-term infrastructure commitments will be applied in practice.

⁴ [A Metropolis of Three Cities | Planning](#)

Recommendation 1:

That the NSW Government publicly exhibit the draft State Land Use Plan prior to finalising the Sydney Plan to allow councils and communities to review and comment on how statewide priorities and long-term infrastructure commitments will be applied in practice.

Importance of strategic planning to local government

Well-planned communities with homes for all is an Advocacy Priority for LGNSW⁵.

Effective planning and housing solutions require genuine collaboration between federal, state and local governments. A strategic, evidence-based approach to planning ensures decisions balance development with environmental and social sustainability, and that infrastructure is delivered in a timely and efficient manner.

Councils are critical delivery partners in planning for and accommodating Sydney's growth: preparing and updating local plans and strategies, assessing development, and planning and delivering local infrastructure. Translating regional direction into zoning, place-based strategies and contributions frameworks is a local government function that requires clarity of purpose, timely infrastructure sequencing and resourcing.

The support of councils and communities is the social licence for growth and greater density in our pre-eminent city. Development that occurs in an ad-hoc way, unsupported by necessary infrastructure, can diminish quality of life and productivity. Strategic planning is essential to providing a strategic vision and ensuring growth and infrastructure investment are aligned to deliver that vision. The finalisation and adoption of the Sydney Plan - which should set this vision and provide the detailed plan to coordinate growth and infrastructure - must be a priority.

LGNSW position on strategic planning

The LGNSW Policy Platform⁶ consolidates the voices of councils across NSW, reflecting the collective positions of local government on issues of importance and guiding LGNSW in its advocacy on behalf of the local government sector.

LGNSW has long insisted on the importance of strategic planning as it enables communities to input to regional and local objectives, plans and strategies. Position Statement 7.4 of the LGNSW Policy Platform is to advocate for:

⁵ [LGNSW_Advocacy_Priorities_2025-26.pdf](#)

⁶ [Policy Platform | LGNSW](#)

Strategic (local, district and regional) plans that reflect the agreed planning outcomes from community engagement at a local, regional/district and metropolitan levels.

Also, Position Statement 7.11 advocates for:

A planning framework (with actions, responsibilities and timeframes) and statutory mechanisms to deliver high level objectives in regional and city plans (including protecting employment lands, food security, open space, liveability, sustainability).

LGNSW seeks a planning system that allows councils to lead locally, aligns growth with enabling infrastructure, and partners with local government across plan making and delivery.

The Sydney Plan Overview

The draft Sydney aims to set out how the NSW Government will address growth in the Sydney region over the next 20 years. The exhibited material states the Plan will guide state and local strategic planning and assessments, infrastructure planning and prioritisation, and public and private investment decisions, applying the government's proposed seven statewide priorities (Aboriginal Outcomes, Housed, Prosperous, Connected, Resilient, Liveable, Coordinated) at a regional scale. LGNSW supports this concept and notes the publication of associated technical appendices (e.g. Jobs Guidance, Flood Planning Principles, Urban Footprint Policy Guidance) to assist in implementation.

Strategic vision

The draft Sydney Plan outlines a 20-year horizon, yet it largely reiterates existing NSW Government policies rather than providing a genuinely forward-looking strategic vision. Presenting short-term policy decisions as long-term strategy reduces strategic clarity and does not provide the long-term certainty that all stakeholders require.

Councils and the Planning Institute of Australia (PIA) NSW⁷ have cautioned in their submissions that the relative absence of longer-term spatial structure and sequencing of growth areas in the draft Plan weakens the basis for interpreting 'strategic merit'. This is a key requirement of planning proposals⁸ and one that councils understand well. They rely on the strength and clear direction in the region plan to guide local planning proposals and strategies. As discussed later in this submission, strategic merit is also

⁷ [PIA NSW | Submission on the Draft Sydney Plan and Supporting Documents](#)

⁸ [Local Environmental Plan Making Guideline – August 2023](#) – When a local environmental plan (LEP) is made or amended through the planning proposal, it must demonstrate strategic merit. 'Strategic merit' means a proposal's demonstrated alignment with the NSW strategic planning framework or current government priority.

fundamental to ensuring that new assessment pathways such as targeted assessment development (TAD) and other planning system reforms⁹ align with the strategic plan.

While the Plan's focus on addressing the city's housing challenges is understood, the housing-led orientation of the Plan undervalues the broader comprehensive strategic direction needed to plan for Sydney's population growth and guide major infrastructure decisions over the next two decades.

Its reliance on short-term, 5-year housing targets - with no direction for the subsequent 10- or 20-year periods reinforces councils' concerns that it risks becoming reactive rather than strategic. Councils are required to update their local plans to incorporate the 2024-29 targets, yet this timeframe will be almost over before most reviews are completed, with no direction for targets beyond that date.

Further, the requirement to update LSPSs in 2027, in the absence of higher-order policies and clear State commitments, creates risks of premature commitments and community expectations that councils cannot deliver. Local government needs certainty, clear justification, and stable long-term policy settings before undertaking significant updates. More broadly, the development sector also requires certainty and stability to promote investment and deliver the housing that is enabled by the planning system.

The Plan should be strengthened with a clear long-term vision and spatial strategy that considers Sydney's land use and infrastructure needs over the next 20 years and beyond. Rather than relying on a single set of assumptions and a compilation of policy statements, a genuinely strategic approach would see the draft Plan explore multiple growth trajectories, identify emerging risks and opportunities, and equip all levels of government and communities to make informed long-term decisions.

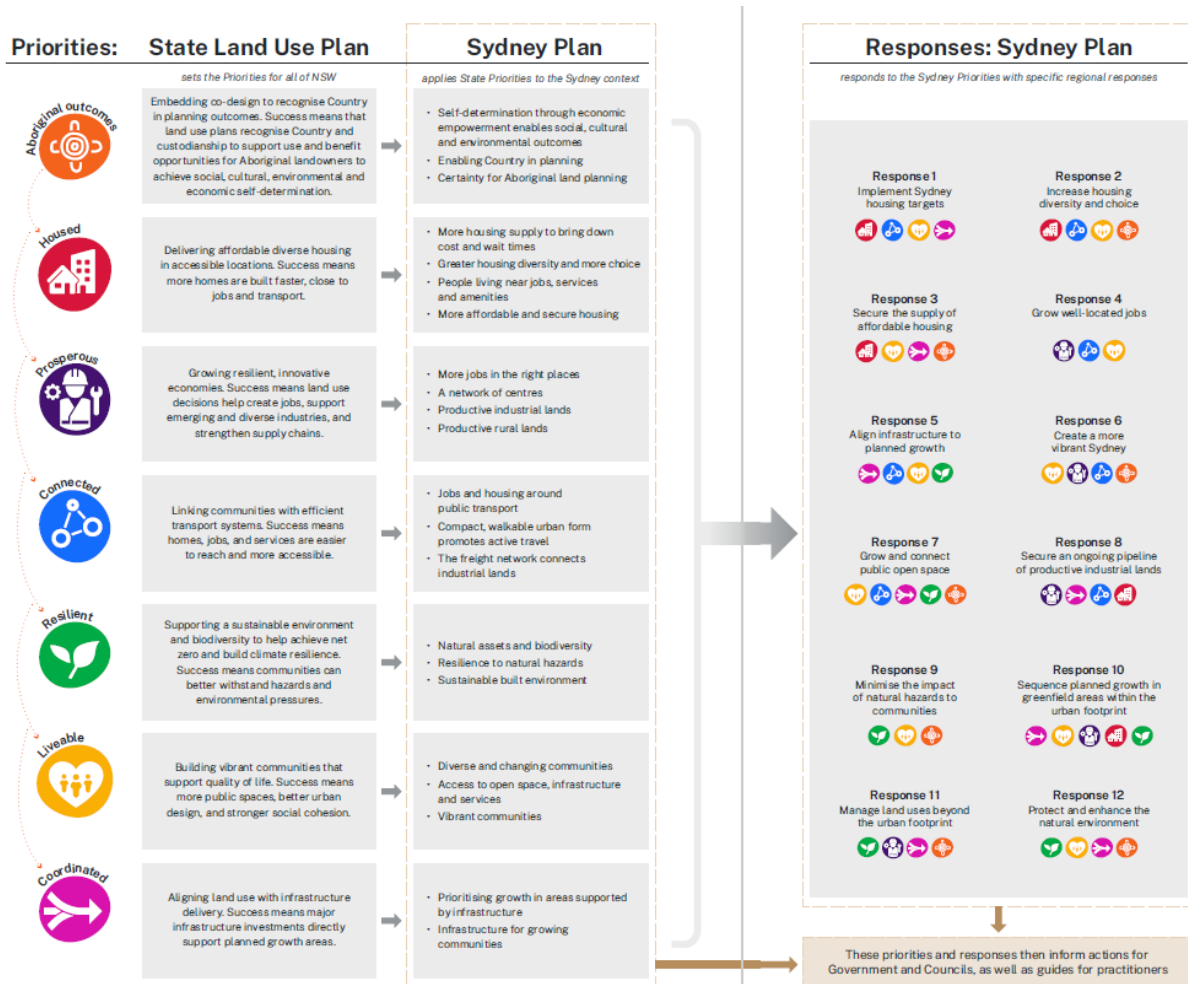
Recommendation 2:

That the draft Sydney Plan be revised to include a forward-looking strategic vision that explores multiple growth trajectories and considers a direction of 20 years and beyond for land use and infrastructure that will enable councils to undertake evidence-based updates to local plans with greater certainty.

⁹ [Planning reforms | Planning](#)

The Sydney Plan Priorities

The draft Sydney Plan applies the seven statewide priorities from the yet-to-be-released State Land Use Plan to the Sydney context and proposes specific policy and planning responses as shown in the diagram reproduced below:



Source: Figure 2: Structure overview, p 8 in [The Sydney Plan draft](#)

As indicated in LGNSW's separate submission on the *New approach to strategic planning: Discussion paper*, LGNSW supports the concept that statewide priorities – providing high-level direction – are reflected through region and local plans, to provide a line-of-sight between the three levels. Councils have highlighted that the seven proposed statewide priorities omit several important areas – such as food production and security, heritage, sustainability, inclusion and health and safety. This is discussed further in LGNSW's other submission. LGNSW has also recommended that the NSW Government consider introducing other additional priorities to the framework or explicitly integrating these key elements within the proposed priorities.

Infrastructure responsibilities and integration

With the Sydney Plan recast as land-use planning document - rather than a comprehensive regional plan that connects land use, transport and infrastructure planning - its ability to effectively guide Sydney's future growth appears more uncertain.

Councils highlight there is limited clarity and hence uncertainty about how the long-term strategies and responsibilities of other state agencies - delivering transport, utilities, schools, health and waste infrastructure, and coordinating open space (recognising the different role of recreational and ecological components of the blue/green grid), heritage, social infrastructure and commitments to the natural environment and sustainability - will align with the Sydney Plan.

The exhibited document notes that the Sydney Plan "should be read in conjunction with other NSW Government infrastructure and servicing plans"¹⁰. To deliver better-connected communities, LGNSW recommends expanding the scope of the Plan to clearly show how land-use outcomes align with existing, committed and future transport and essential infrastructure networks. While DPHI's Infrastructure Opportunities Plans¹¹, released days before this submission was due, go some way towards achieving this, they should be better integrated into the Plan. This is central to achieving the 'Connected' and 'Coordinated' priorities and ensuring state infrastructure planning keeps pace with growth.

The NSW Government should commit resources to a publicly accessible dashboard on the DPHI webpage that consolidates all the related infrastructure and servicing plans in one place with clear, easy-to-navigate links to the relevant agency information and regular updates on the progress of all related plans. This would provide transparency and greater certainty around how these related plans will be integrated and contribute to delivery of the draft Sydney Plan.

¹⁰ [The Sydney Plan draft](#), p 9

¹¹ [Infrastructure Opportunities Plans | Planning](#)

Recommendation 3:

In response to the 'Connected' and 'Coordinated' priorities, the Sydney Plan should be expanded to include well-defined commitments across the full range of essential infrastructure and agency responsibilities - including transport, utilities, waste, health, education, environmental, heritage, sustainability and social infrastructure - and clearly set out how land-use outcomes align with existing, committed and future infrastructure networks.

Recommendation 4:

That the NSW Government invest in a publicly accessible, centralised dashboard that consolidates all related infrastructure and servicing plans to improve transparency and demonstrate integration across agencies.

The Sydney Plan Responses & Actions

The Plan addresses the statewide priorities with 12 specific policy and planning responses, of which there are 22 actions assigned to councils. The majority of these have a short-term timeframe for completion between 2026 and 2029.

Helping councils deliver actions

The overlapping timeframes and complex strategic planning work involved in many of the Plan's the 22 council actions will place a significant additional funding and resourcing burden on councils.

Adjusting timeframes – The clustering of actions within similar timeframes may create resource bottlenecks for councils and limit effective sequencing of the workload. This makes prioritisation and delivery difficult, especially for councils with limited resources. To ensure effective implementation, the Plan should adjust key timeframes and stagger or reprioritise actions in line with the advice provided by councils.

Funding and resourcing council strategic planning – A number of actions in the draft Plan have ongoing or periodic resource implications for councils. For example, Actions 2.6 and 2.7 are significant bodies of work. Additional funding streams need to be identified to help councils deliver these actions in a meaningful and timely way.

The NSW Government can support councils to deliver their responsibilities through targeted funding for:

- **Accelerated strategic planning** – Commit \$33 million to a 2-year funding program for strategic planning and evidence-based studies towards delivering actions in Responses 1 (Implement housing targets) and 2 (Increase housing diversity and choice).

- **Implementation of Affordable Housing Contributions Schemes¹²** – Establish a 2-year council funding program to fast track the uptake of Affordable Housing Contributions Schemes required under Response 3 (Secure the supply of affordable housing).
- **Accelerated review of local industrial lands strategies and zoning** – Commit to a multi-year funding program for councils to prioritise reviewing their local employment / industrial lands policies in response to Response 8 (Secure an ongoing pipeline of productive industrial lands) and expectation arising from the concurrently exhibited Statewide Policy for Industrial Lands.

Similar targeted support for councils to deliver local actions has been provided previously through programs such as the Regional Housing Strategic Planning Fund¹³ and past State Government funding to accelerate LEP updates¹⁴.

Recommendation 5:

The DPHI adjust key timeframes to stagger or reprioritise actions in line with the advice provided by councils, to ensure realistic and achievable implementation timeframes.

Recommendation 6:

That the NSW Government commit targeted funding to support councils in delivering the Sydney Plan, including:

- A \$33 million, two-year program for strategic planning and evidence-based studies (Responses 1 and 2).
- A two-year program to accelerate implementation of Affordable Housing Contribution Schemes (Response 3).
- A multi-year program to support timely review of local industrial lands strategies and zoning (Response 8).

Affordable housing

Affordable housing is a key priority for LGNSW and councils. Without a strong and coordinated affordable housing framework at the regional level, councils are limited in their ability to meet local needs, support vulnerable residents, and ensure balanced, sustainable growth across their LGAs.

LGNSW welcomes inclusion of Response 3 (Secure the supply of affordable housing). However, it is disappointing to see the scaling back of policy direction on affordable

¹² See [Annual_Conference_2025-Resolutions.pdf](#) – Resolution 54

¹³ [Regional Housing Strategic Planning Fund | Planning](#)

¹⁴ In 2018, the Accelerated LEP Review Program provided \$2.5m in funding for councils to review and update their LEP to reflect direction in the higher-level region plan.

housing targets currently in the Greater Sydney Region Plan 2018¹⁵. Embedding policy settings for affordable housing targets in the Sydney Plan would signal the NSW Government's commitment to delivering measurable affordable housing supply and provide much needed certainty to all stakeholders of its intention in this regard. In line with endorsed policy positions¹⁶, LGNSW would like to see minimum affordable targets of 10 per cent social and affordable housing across NSW and at least 30 per cent on government-owned land.

LGNSW supports actions for councils to finalise Affordable Housing Contributions Schemes but as discussed above, this needs to be supported with appropriate funding to enable councils to complete this work.

Recommendation 7:

That the Sydney Plan be revised to embed policy settings for implementing affordable housing targets to signal the NSW Government's commitment to delivering measurable affordable housing supply and provide much needed certainty for stakeholders.

Waste infrastructure

With further population growth generating additional volumes of waste, a prioritised and coordinated approach to this issue by the NSW Government in collaboration with councils is essential. The need for well-considered and planned waste infrastructure and supporting operational systems must be recognised in the Sydney Plan.

Councils advise that waste infrastructure is not currently addressed within the Urban Development Program (UDP) and waste management planning in NSW has generally lacked coordination across the different government levels. Despite the identified accessibility and capacity constraints and councils' concerns about the implications for future development in the longer term, there are challenges in getting traction on this issue. Councils want to ensure that see the Sydney Plan must ensure the infrastructure delivery programs identified can contribute to the delivery of much needed waste infrastructure to address the current waste challenges.

The 'Coordinated' priority should acknowledge and recognise waste management and planning as an essential service and that a well-planned integrated waste infrastructure network is essential to cost effectively manage Sydney's waste. To ensure that waste collection design and management is incorporated into all new housing and employment developments, the Plan should include an action for NSW Government to liaise with the Environment Protection Authority (EPA) to plan for the long-term waste management and recycling solutions for Sydney and incorporate waste controls into planning reforms.

¹⁵ [Greater Sydney Region Plan](#) – Action 5: Implement Affordable Rental Housing Targets

¹⁶ [Policy Platform | LGNSW](#)

Recommendation 8:

The Sydney Plan should broaden the remit of the UDP to ensure waste infrastructure is included in the planning and sequencing of essential infrastructure for growth.

Recommendation 9:

The Sydney Plan should be amended to include an action for NSW Government to liaise with the Environment Protection Authority (EPA) to plan for the long-term waste management and recycling solutions for Sydney and incorporate waste controls into planning reforms.

Open space and the blue-green grid

LGNSW welcomes the Sydney Plan's acknowledgement of the vital role of public open space in supporting liveability, urban sustainability, resilience and climate adaptation. The principles outlined in Appendix F (Public Open Space) and Appendix G (Blue-Green Grid) generally align with local government sentiment. Although brief, these appendices, include important recognition that:

- the significant cost of acquiring, embellishing and maintaining open space assets and securing land for public open space is increasingly challenging, particularly in infill and greenfield contexts, and will require adequate State support; and
- councils have generally played the lead role in providing blue-green grid connections and their ongoing work in mapping, planning and delivering blue-green grid connections.

However, consistent with broader gaps in supporting studies across the draft Plan, councils have concerns that Appendices F and G lack depth, providing no research, evidence base, strategic studies, or analysis of existing and future open space needs.

The draft Plan and Appendices do not outline how future networks will be planned, funded or delivered, despite Sydney's growing housing and employment demands. Further, treating public open space and the blue-green grid as separate systems overlooks their interconnected nature. A well-planned and embellished public open space network, including blue and green grid attributes, is an essential asset class for liveable and healthy communities and should be recognised as such alongside, transport, education, and utilities. This requires a commitment to strategic, evidence-based planning to assess current and future needs for public open space and broader social infrastructure. This should form part of the actions to deliver Response 7 (Grow and connect public open space).

Recommendation 10:

The State Plan should recognise and plan for an integrated, citywide open space and blue-green grid network as essential infrastructure, supported by a strategic, evidence-based framework based on current and future community needs across all public open space and social infrastructure types.

Other matters

Mapping, labelling and other discrepancies

Simple correlation of NSW government datasets across base mapping is needed to overcome various discrepancies councils have identified. They have cited discrepancies and inaccuracies in the labelling of the draft Sydney Plan maps and are concerned these contradict the strategic directions established in the current adopted strategic regional and local plan direction. Examples such as variances in open space modelling, smaller centres and rural towns being omitted or insufficiently recognised, and mapping inaccuracies, should be addressed in consultation with councils and could be resolved by simple cross-check between state agencies and recognition of existing local government area mapping.

Recommendation 11:

Update, correct and correlate NSW Government mapping datasets between state agencies, local government areas and the Sydney Plan to produce a consistent base from which to work.

Interaction of legislated planning reforms and the new strategic framework

Councils seek clarification regarding how new assessment pathways and other reforms¹⁷ enabled through the *Environmental Planning and Assessment Amendment (Planning System Reforms) Act 2025* will interact with the new strategic planning framework. They are concerned that the changes further entrench a state-led planning approach that limits meaningful council and community input and undermines strategic planning.

Councils have also highlighted that new state-led processes and pathways enabled by the latest legislation reforms – specifically the Housing Delivery Authority (HDA) and targeted assessment development (TAD) – need to demonstrate consistency with

¹⁷ [Planning reforms | Planning](#)

strategic plans, which must contain sufficient spatial clarity and merit criteria to support robust decision-making. For example:

- **Housing Delivery Authority**¹⁸ – While the HDA’s assessment criteria require proposals to demonstrate “strategic merit”, councils are concerned the Sydney Plan does not provide sufficient context, guidance or criteria to support a rigorous or transparent merit assessment through the HDA process.
- **Targeted Assessment Development** – The TAD enables certain key assessment criteria to be “switched off” for specific development categories or locations where proposals are considered consistent with relevant strategic plans i.e. the strategic planning work has been done upfront. However, given the limited detail and direction in the draft Sydney Plan, councils are concerned that the new TAD pathway may result in outcomes that are inconsistent with local strategic objectives or community expectations.

Recommendation 12:

That DPHI provides clarity on how the planning reforms relate to the new strategic framework and how the Sydney Plan will be used to provide context, guidance or criteria that supports a rigorous or transparent merit assessment for the purposes of the HDA process and TAD pathway.

Implementation

The Sydney Plan’s success relies on a robust and transparent implementation framework with measurable actions. To ensure meaningful outcomes, the NSW Government must invest in mechanisms that strengthen and support the Plan’s implementation and review processes.

Monitoring and evaluation – Driving action and tracking outcomes requires the Plan’s responses and actions to be clear, measurable and easy to review and report against. While the exhibited document refers to a monitoring, evaluation, reporting and learning (MERL) framework, it does not specify the accountabilities, criteria or metrics required to drive continual improvement of each element of the plan.

Without well-defined and measurable actions (developed in collaboration with councils) councils cannot be confident about what they are expected to deliver. In relation to housing delivery targets for example, the Plan directs councils to “*plan for the feasible number of homes in their local area ... not just the theoretical capacity*”¹⁹. Apart from this being undefined and therefore hard to monitor and assess, it also fails to account for the growing uncertainty arising from ad hoc State Government interventions in zoning and development standards over which councils have no control. Councils need

¹⁸ [Housing Delivery Authority | Planning](#)

¹⁹ [The Sydney Plan | Planning Portal - Department of Planning and Environment](#), p 44

certainty in relation to the assessment of their performance – particularly regarding housing delivery targets.

A statutory obligation requires five yearly reviews of the Greater Sydney region plan²⁰. Future reviews should be informed by performance measured against each priority and by progress in delivering the Plan's responses and actions.

Measuring housing outcomes – Housing is a major focus of the draft Plan and would benefit from a more sophisticated dataset to track outcomes and improve the effectiveness of housing delivery reforms. Rather than tracking the Plan's performance against housing supply targets alone, an enhanced NSW housing dashboard or hub should be established to track a wider set of housing diversity, availability and affordability outcomes, and introduce specific measures that track affordable housing numbers, net new dwellings and net dwelling loss.

Recommendation 13:

The NSW Government should clearly identify and commit to measuring outcome-based performance indicators linked to each Plan priority, supported by defined accountabilities for both state agencies and councils. This must include a refined and transparent scope for future Plan reviews.

Recommendation 14:

The NSW Government should invest in an enhanced housing dashboard to improve monitoring and reporting of housing outcomes with transparent, timely data on housing diversity, availability, affordability and specific tracking of affordable housing and net new dwellings.

Conclusion

LGNSW is pleased to see the NSW Government's long-awaited release of the regional plan for Sydney. Providing a clearer, more coordinated approach to land use planning that delivers homes in the right locations, creates more jobs, invests in infrastructure and protects our environment needs to be a priority for Sydney.

This submission reflects a local government perspective and the views and concerns of councils. Through their submissions they have:

- Recommended the draft Plan be revised to provide greater strategic vision and direction, particularly to bring clarity in interpreting strategic merit in local planning proposals and for new assessment pathways such as TAD.

²⁰ *Environmental Planning and Assessment Act 1979*, s 3.5

- Highlighted areas where the statewide priorities could be expanded to recognise other elements that are important for land use and their communities.
- Sought clarity about interagency delivery (notably transport, open space, utilities, health and education infrastructure) - how these responsibilities interact, and how they will be coordinated in the delivery of the Sydney Plan - to bring certainty in the planning and staging of growth around committed corridors and centres.
- Emphasised the importance of having transparent and up-to-date evidence and studies to underpin the draft Plan.

Local government seeks to work constructively with the NSW Government to develop a strategy that demonstrates how the Sydney Plan will be effective in truly realising a 20-to-40-year horizon for Sydney's future. It is critical that the proposed strategic plan provides clarity and direction for lower updating local plans and interpreting strategic merit in planning proposals and other assessment pathways enacted by planning system reforms legislation.

With its new approach to strategic planning, the NSW Government has signalled a renewed commitment to strategic planning. It is fundamental that the new Sydney Plan and indeed all the revised region plans contains a genuine and clear strategic vision that will be crucial to guiding not only the actions of councils in updating their local plans, but the activities of the HDA and decisions on where and how the new TAD assessment pathway will apply. For the Sydney Plan to become a meaningful strategic compass for decision-making about planning proposals and development assessments, it needs to be revised with clarification of a long-term vision and spatial direction showing growth and infrastructure sequencing.