



27 February 2026

Department of Planning, Housing and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Online submission at:

<https://www.planning.nsw.gov.au/policy-and-legislation/planning-reforms/a-new-approach-to-strategic-planning>

Dear Sir/Madam

Re: SSROC Submission to the discussion paper The NSW Approach to Strategic Planning

1. Introduction

The Southern Sydney Regional Organisation of Councils (SSROC) appreciates the opportunity to make a submission regarding the discussion paper The NSW Approach to Strategic Planning.

SSROC acknowledges the need for long-term strategic planning for New South Wales and recognises it as a milestone for creating the next generation of strategic region plans for New South Wales, and Sydney in particular.

SSROC is an association of twelve local councils in the area south of Sydney Harbour, covering central, inner west, eastern and southern Sydney. SSROC acknowledges the traditional custodians of the land on which we work and live, the peoples of the Darug, Dharawal and Eora Nations. SSROC provides a forum for the exchange of ideas between our member councils, and an interface between governments, other councils and key bodies on issues of common interest. Together, our member councils cover a population of about 1.9 million, one third of the population of Sydney, including Australia's most densely populated suburbs. SSROC seeks to advocate for the needs of our member councils and bring a regional perspective to the issues raised.

At a high level, SSROC agrees broadly with the seven priorities put forward for informing the proposed State Land Use Plan and Sydney Plan. Each of them has strong individual merit, though potentially with some clarifying refinements.

However, the seven priorities lack an overarching driver to successfully guide their integration and provide coherent plan-making for NSW Government and local councils.

This submission recommends that *placemaking* is adopted as an additional distinct and explicit Priority that cascades consistently down across all three levels of strategic planning within:

- The NSW Land Use Plan
- Sydney Region Plan; and
- Local plan making (LSPS and LEPs, State-led Precinct Master planning).

Elevating placemaking to a system-wide Priority embedded at each level will strengthen the capacity and the ambition of the NSW planning system to deliver growth that is locally responsive, culturally informed, environmentally appropriate and design-led while supporting housing supply,

infrastructure delivery and productivity objectives. Placemaking can enable the ordering and integration of the other seven Planning Priorities and so optimise outcomes in the interests and well-being of communities, all other stakeholders and the economy at large. Placemaking has a successful track record translating multiple and often competing priorities and outcomes into a particular spatial context that the general public can visualize and relate to.

2. Our understanding of the proposed changes

The NSW Government recently placed [key strategic planning documents](#) on exhibition:

1. A New Approach to Strategic Planning: Discussion Paper
2. The Draft Sydney Plan
3. Statewide Industrial Lands Policy

[A New Approach to Strategic Planning: Discussion Paper](#) offers a hierarchy of strategic plans: a State Land Use Plan, fewer Regional Plans (no District Plans) and Local Strategic Planning Statements for each council area.

The discussion paper outlines the role of a Statewide Land Use Plan, how the new structure is intended to work, and what it could mean for communities, councils and industry.

The new approach to strategic planning proposed in the discussion paper is distinct from, but complementary to, the statutory planning reforms enacted through the Environmental Planning and Assessment (Planning System Reforms) Bill 2025. The statutory planning reforms focus on development assessment pathways and accelerated development delivery.

Together, these changes aim to support the NSW Government's effort to simplify and improve the planning system in both the short and long term.

3. General Comments

SSROC welcomes the exhibition of the the discussion paper, The NSW Approach to Strategic Planning. SSROC appreciates a number of proposed key elements of the framework:

- State Land Use Plan
- Recommitment to Regional Plans
- Stronger role for LSPS
- An ambition for a modular adaptive framework.

Sydney and the other NSW Regions need a long-term strategic framework to guide growth, investment and decision-making on land uses including – but not limited to – immediate housing targets.

The framework must be adaptable so that individual elements can be updated within an overarching strategic direction. The Plan needs to integrate housing, employment, climate, economic development, infrastructure and service delivery – so that land use plans interact with key dimensions of the economy, society and environment.

The preparation of a [State Land Use Plan](#) offers a unique opportunity to adopt a longer term perspective and give sufficient detail and scope to inform the Sydney and other Region Plans. The state plan should:

- Offer a spatial structure of long-term growth areas and centres structure.
- Engage and adopt an overarching and sustainable growth vision for settlement.
- Integrate land use with city-shaping infrastructure and services.

- Formulate medium- and long-term housing supply and diversity targets to ensure everyone is adequately and affordably housed, and link these with the employment targets to enable Councils/agencies to integrate and sequence land use and infrastructure policy and investment, tested by scenario modelling.
- Consider how the nominated Priorities should be reflected in different regions.
- Embed placemaking as a guiding integrating tool and Planning Priority.
- Create a modular framework for the hierarchy of strategic plans, infrastructure and action plans that enables changes and adaptations without dismantling the entire framework. The South East Queensland (SEQ) Infrastructure Plan and Supplements provide a working model for delivering this outcome (refer [SEQ supplements](#)).

As noted, a long-term Land Use Plan can be flexible and adaptable. Effective strategic planning ensures land use and infrastructure decisions work together, are made at the right time and in the right locations and provide a clear basis for coordinated investment. SSROC considers there is significant scope to build on the NSW Plan to create a comprehensive workable strategy for Sydney's and other Regions' long-term future.

The framework should allow Priorities and actions to evolve in response to changing conditions, while remaining anchored in clear long-term direction. For example, the SEQ model of a long-term growth vision, integrated infrastructure plan and a short-term action plan is modular in structure and has continually evolved.

However, without a published State Land Use Plan to anchor the hierarchy, the new framework increases uncertainty for LSPS updates, housing capacity decisions and centres' planning. The production of the first State Land Use Plan must therefore become a priority task for the Department.

A long-term spatial structure and strategy for the NSW Land Use Plan

The Plan should include a long-term vision, spatial strategy and structure that addresses the longer-term perspective of (say 30–50-years) land use and infrastructure opportunities and vulnerabilities. This could be supported by scenario planning to identify and prepare for future decisions – rather than respond to only one set of parameters to entrench a flexible mindset.

A flexible and adaptable long-term Land Use Plan within the framework should allow priorities and actions to evolve in response to changing conditions, while remaining anchored in clear long-term direction. The continually evolving, modular SEQ model is an example of this.

A dynamic Plan should include a number of specific features and considerations:

- A single spatial representation can bring each of the Region Plans together under one framework with a series of maps showing growth corridors centre expansion and supporting statewide infrastructure systems (like renewable energy).
- Long term population, housing and job growth targets are more than a projection of trend. They require deliberation on scenarios regarding demographics, economic development opportunities, carbon reduction, future hazards and city shaping infrastructure. These considerations have a spatial dimension and relate where and how centres, corridors, future urban and renewal areas can grow. They should reflect opportunities, natural constraints and address distributional issues.
- The Plan should recognise the inter-regional interdependencies for infrastructure and economic systems as well as inequities that exist across Sydney and regions. It should respond in the vision and structure to support economic and social development, including key centres and transport corridors, such as the Western Sydney Metro across parts of Sydney and the proposed fast rail between Sydney and Newcastle.

Plan Spatial Integration through Placemaking

While the Regional Plans will reference the State Land Use Plan Priorities, the Land Use Plan should be capable of setting a spatial structure with tailored responses and actions reinforcing evidence for region-specific needs.

The [New Approach to Strategic Planning Discussion Paper](#) however, proposes a single region plan for the whole of regional NSW. Given the widely diverging contexts this would cover, this consolidation seems neither appropriate nor consistent with good planning practice for place at the widest scale.

Statewide and regional planning must reflect genuine regional diversity and economic function.

At a high level, SSROC supports the seven Priorities proposed for the State Land Use Plan, and how those seven Priorities are then applied in the draft Sydney Plan. However, guidance as to how those Priorities will be implemented by agencies and Councils over the 20-year period of the draft Plan is limited.

Some Priorities are barely covered in the response section in the draft Region Plan, such as Aboriginal Outcomes and Connected. Those Priorities that are reflected in the responses section are limited to a small number of short-term actions for DPHI or Councils only, with no guidance for other agencies and limited guidance for implementing the priorities at local government level. The NSW Land Use Plan should consider how these Priorities will be readily turned into meaningful outcomes. SSROC proposes to achieve this by adding an eighth Priority *placemaking*.

A compelling case for the inclusion of an additional *placemaking* priority to the plan and other planning tiers is made in Appendix 1 of SSROC's submission on the Sydney Region Plan. A copy of this appendix is at Attachment1.

Alignment of SEPPs and the hierarchy of planning instruments

A new approach to the relationship between SEPPs and Regional Plans is required to address conflicts arising in the proposed Strategic Planning Framework. The Discussion Paper on statewide planning highlights the fragmented and duplicative nature of strategic planning activities in NSW.

As SEPPs sit above regional plans in the strategic planning hierarchy, there is the potential for disagreement with the spatial intent of Regional (and local) Plans. The Discussion Paper is silent on how this conflict will be resolved. An option would be for SEPPs to focus on process and delivery while the regional plan focuses on outcomes for places.

As outlined in the Discussion Paper, the intention is for the regional plans to be dynamic documents that can be regularly updated, allowing changes to SEPPs or the introduction of new SEPPs as required. To function effectively, the NSW Land Use Plan must clearly distinguish between core elements that remain fixed and modular elements that may be updated as circumstances change. An adaptive model must not undermine the stability that councils, communities and industry rely on.

The framework should be supported by a transparent process for making changes that includes clear triggers or thresholds for revisions, and consultation with councils and stakeholders. The review timeframes should not be short-term or market-driven, as this could encourage persistent land-speculation.

Supporting Waste and Resource Recovery Infrastructure through inclusion in the Land Use Plan

The focus on short-term actions only by DPHI and Councils does not foster an integrated multi-agency approach to achieving a shared long-term strategy for infrastructure. As currently framed, the Draft Sydney Plan is weighted towards the delivery of short-term housing targets and reform updates, rather than an integrated and spatial long-term strategy. The exhibited approach raises

concerns which can be partly remedied by identifying directions for waste and resource recovery infrastructure in the NSW Land Use Plan.

A clear long-term strategy for waste and resource recovery infrastructure is essential to provide certainty for communities, government and investors about how land use, housing, employment and infrastructure decisions fit together over time and flow on to service growing waste infrastructure needs.

Because of the lack of a singular custodian of regional waste and resource recovery infrastructure, the Plan should include the development of waste and resource recovery infrastructure plans and a process for identifying new locations for sites and circular precincts for servicing the State's regions.

A strengthened Local Strategic Planning Statements framework to inform development

The discussion paper signals changes to the current Local Strategic Planning Statements (LSPS) framework to align with the new strategic planning framework. It proposes aligning LSPS reviews with Integrated Planning and Reporting (IP&R) cycles.

Clarity is also needed on the role of LSPSs in relation to new state delivery mechanisms, particularly the Housing Delivery Authority (HDA). Under the current strategic merit criteria, HDA assessments do not appear to formally recognise LSPS directions. This creates a risk that councils' long-term strategic work may be overlooked or overridden, reducing certainty for councils, communities and proponents.

The HDA should treat LSPS alignment as a Gateway requirement. Proposals should not proceed to State Significant Development unless they demonstrate clear alignment with the relevant LSPS. This will avoid duplication, protect local strategic work and provide certainty for proponents. LSPSs must at a minimum guide how HDA proposals respond to local priorities, infrastructure capacity and sequencing. This is necessary to ensure State-led delivery supports, rather than displaces, local strategic outcomes.

3 Recommendations

SSROC considers that a draft NSW Land Use Plan and the strategic planning framework will be significantly improved by the following items.

- 1 Include a geo-spatial structure and strategy to the Plan, with a more detailed description of the intended outcomes for each priority.
- 2 Include an additional *placemaking* Priority and principles to order the Plan and plans in the other planning tiers to help successfully integrate and weight the other seven existing priorities. This will strengthen the capacity of the Department and Councils to prepare the integrated place-based plans more coherently.
- 3 Revise the Priorities to ensure they are clear, operational and capable of guiding land use planning decisions:
 - Providing clear guidance on how the priorities are to be applied and balanced in practice, including how trade-offs between housing, employment, infrastructure, environmental protection and liveability are to be managed through land use planning.
 - Strengthening the success measures for each priority so they move beyond high-level aspiration and clearly inform rezoning decisions, growth sequencing, infrastructure planning and investment.
- 4 Clarify statutory review cycles for both region plans and Local Strategic Planning Statements (LSPSs), including whether amendments to the EP&A Act are required and



establish clear triggers for updating modular components and technical appendices, limited to matters that materially affect implementation.

- 5 Develop long-term infrastructure plans and align them with the Land Use Plan, particularly major transport infrastructure.
- 6 Include services and systems planning for waste and resource recovery infrastructure as part of recommendation 3 above. This essential infrastructure has been historically neglected and requires specific tailored land use planning interventions and authorising Statewide policy directions to be delivered in Region Plans.
- 7 Facilitate the preparation of guidance in collaboration with councils on updated LSPS guidelines, including how LSPSs integrate with Integrated planning and reporting requirements and how they support and interact with State delivery mechanisms.

If implemented, these recommendations will guide, clarify and strengthen Region Plans and better enable Councils to undertake local plan making.

4 Conclusion

Thank you for the opportunity to provide feedback on the discussion paper, *The NSW Approach to Strategic Planning*.

SSROC looks forward to the prompt development a new NSW Land Use Plan that addresses the issues raised in this submission and takes up some exciting opportunities that will help make it fit for purpose.

A State Land Use Plan is now needed to anchor regional planning; the absence creates some uncertainty for LSPS updates and housing capacity decisions. Giving LSPSs more statutory weight could help to address this problem.

Key to the success of the Land use Plan will be providing a long-term vision and spatial structure including growth centres and growth corridors that interpret the Plan's directions and priorities (such as housing, jobs, resilience). This format with advice about the focuses of government and private sector future investment will help guide and clarify the next layer down of Region Plans.

In order to make this submission within the prescribed timeframe, it has not been possible for it to be reviewed by councils or to be endorsed by a formal meeting of SSROC Delegates. I will contact you further if any issues arise as it is reviewed. If you have any queries, please do not hesitate to contact me or Mark Nutting, SSROC Strategic Planning Manager on 8396 3800, or ssroc@ssroc.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink that reads 'H Sloan'.

Helen Sloan
Chief Executive Officer
Southern Sydney Regional Organisation of Councils