



27 February 2026

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

Online submission at:

<https://www.planningportal.nsw.gov.au/draftplans/exhibition/sydney-plan>

Dear Sir/Madam

## **Re: SSROC Submission to the draft Sydney Region Plan**

### **1. Introduction**

The Southern Sydney Regional Organisation of Councils (SSROC) appreciates the opportunity to make a submission about the draft *Sydney Region Plan* of the Department of Planning Housing and Infrastructure (the Department).

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

SSROC welcomes the exhibition of the Sydney Plan and supporting documents. The Plan has the potential to link the major planning reform initiatives and 5-year housing targets with infrastructure and service delivery within a spatial framework for Sydney.

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 proposed for informing the Sydney Plan and the proposed State Land Use Plan. Each of them has strong individual merit, though potentially with some clarifying refinements.

However, seven priorities lack an overarching driver either to successfully guide their integration into a single coherent Region Plan, or into councils' local plan-making responsibilities.

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

- The NSW Approach to Strategic Planning (as a guiding, system-wide priority)
- The draft Sydney Region Plan (the Plan); and
- Local plan making.



Elevating *placemaking* to a system-wide priority 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 will enable the ordering and integration of the seven priorities to be practically realised spatially, in order to maximise outcomes in the interests and well-being of communities, all other stakeholders and the economy at large.

## 2. Our understanding of the proposed changes

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

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

The Sydney Plan will influence how Sydney grows, where investment is directed, and how communities experience change over the coming decades.

The draft Sydney Plan is released alongside *A new approach to strategic planning – discussion paper* that outlines state land use priorities. The draft Sydney Plan applies these priorities to the Sydney context. It addresses these priorities with specific policy and planning responses.

The Sydney Plan's Priorities

- Aboriginal outcomes
- Housed
- Prosperous
- Connected
- Resilient
- Liveable
- Coordinated

*Comment*

However, these Priorities are described largely by single word adjectives and/or verbs as short-hand references rather than the subject area.

Accordingly, the subject area of a Priority is often not immediately apparent and the single word descriptor can then become unhelpful or ambiguous. For example, *Connected*, seeks to reference transport systems linked to communities and industries rather than the many other planning connections that exist.

The Priorities so named therefore will require clarifying subtexts together along with intended outcomes, as provided by the *A new approach to strategic planning*, to avoid an unintended loss of meaning. The document, while highlighting areas of focus for the Sydney Plan flowing from the *State Land Use Plan*, unhelpfully does not proceed to articulate their measures of success. Measures of success, as ambitions, should be added to each of the Priorities, that can then be supported by response actions.

## 3. General Comments and Recommendations

The Sydney Plan sets high level policy priorities, but places substantial weight on subsequent planning work to resolve implementation e.g. Infrastructure Opportunities Plans, sequencing plans and centres strategies could allow a more modular approach than previous plans, allowing sections to be updated as a living document. The challenge will be to retain the overarching strategic intent.

It will be critically important that the subsequent planning work is also exhibited to foster collaboration and enable aligned planning responses across agencies and levels of government. Similarly, if the



new *State Land Use Plan* produces substantial changes to the underpinning planning assumptions and the intended outcomes noted in the draft Plan, the Sydney Plan will need to be amended and updated as changes will need to cascade to region plans. This will require further public exhibition. SSROC has made a separate submission regarding the *New Approach to Strategic Planning: Discussion Paper*.

The draft Plan is weighted towards the delivery of short-term housing targets and reform updates, rather than providing an integrated and spatial long-term strategy. The success of any regional plan depends on many organisations working incrementally towards shared policy goals over a long period of time.

SSROC welcomes that there is a strong emphasis on Councils preparing and delivering affordable housing strategies and contribution regimes. This submission proposes a range of actions in support of this direction.

#### *Plan Spatial Integration through Placemaking*

At a high level, SSROC agrees broadly with the seven priorities proposed for the State Land Use Plan, and how those seven priorities are 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.

Many priorities have no related response section in the document, 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.

SSROC considers there is significant scope to build on the draft Plan to create a comprehensive workable strategy for Sydney's long-term future.

Ad hoc opportunistic rezonings are the antithesis of good placemaking, even if around well-located transport centres. Density done well demands more planning and a wider precinct perspective. The potential for ad hoc rezoning applications to greatly increase pressure on the interpretation of "strategic merit" before revised Local Strategic Planning Statements provide context.

A compelling case for the inclusion of an additional *placemaking* priority to the Plan and other planning tiers is made in Appendix A. Successful placemaking can provide a tangible measure of success.

The Sydney Plan takes a different approach than the previous Greater Sydney Region Plan (GSRP), seeking to maximise flexibility and adaptability to changing scenarios. Placemaking is essentially a flexible and adaptive concept and tool that can be harnessed to provide focussed integrated planning when dramatic changes occur relatively quickly.

Precinct master planning allows councils and the state government together to make responsive decisions that quickly adapt planning controls and land uses to new and emerging circumstances and contexts without resorting to ad hoc, narrow sectional perspectives, or a one size fits all approach, that abandon evidence-based decision making or the shared long-term vision for a locality. Critically it helps to maintain social licence by giving communities a tangible sense of the type change proposed from new growth – visualising the future character – and that their real concerns were addressed and flexibly responded to in the plans.

SSROC member Councils have identified six key themes for consideration in improving the draft Plan, which are discussed below.

#### **Lack of Long-Term Vision**

The Plan's short-term focus limits strategic leadership needed for sustainable urban growth and planning. The Plan says that Sydney will grow over the next 20 years to 6.5 million people, a growth of some 1.2 million people or nearly 25%.

The Plan does not yet provide the coherent, integrated long-term spatial framework required of a global city to guide growth, coordinate infrastructure investment, embed housing within broader economic and place outcomes, and support consistent, long-term delivery. A clear long-term strategy is essential to provide certainty for communities, government and investors about how land use, housing, employment and infrastructure decisions fit together over time.

The Plan contains no vision as to what Sydney will look like in 2045 with no concept of the social or transport infrastructure required as a result. It is unrealistic for a city to grow by 25% with no planned investment in rail connectivity, for example. A clear vision is a prerequisite for successful placemaking decisions.

The draft Sydney Plan does not include 10- and 20-year housing and job targets to enable the cost effective and orderly delivery of land use plans integrated with infrastructure funding and delivery.

Critical elements are not resolved - including the long-term spatial vision and structure, centres strategy, metropolitan rural area, infrastructure opportunity plans, disaster adaptation plans and further actions to fulfil the climate and sustainability objectives.

Whilst the priorities contained within the plan are supported, their implementation through a small number of short-term actions is not appropriate for a Plan of this scale and duration.

Further description of the intended long-term outcomes for each priority would be helpful guidance for Councils (and other agencies) when updating their LSPS's. The short-term actions should have greater detail attached to them and perhaps extend out to 2031 (5 years from now). Medium- and longer-term actions for each response should be included, perhaps with less detail than the short-term actions, for NSW Government, particular relevant agencies, and Councils.

## **Housing**

Clearly the Plan has a key aim to work towards addressing the housing crisis Sydney is currently experiencing, with Responses 1, 2, 3 and 10 directly related to this outcome.

However, the Plan only includes five-year housing targets 2024-2029, a very short-term target with two years already passed. The Plan does not include any 10- or 20-year housing target which makes the orderly delivery of detailed land use plans integrated with infrastructure difficult.

The plan lacks a 20-year spatial vision for housing and appears to simply include a snapshot of already identified TOD or LMR precincts and a vague outline of future urban development in the western suburbs.

The actions related to Housing have limited significant government interventions to drive housing investment, such as building on surplus government land, and continues to blame Councils for not achieving housing targets when they have little ability to control or even influence development activity.

Finally, the Plan fails to recognise different types of housing Councils are delivering to address localised issues, such as student housing or co-living developments which are not reflected in housing targets or supply numbers and leading to misestimations of local capacity for additional housing and infrastructure requirements.

Housing targets should incorporate diversity outcomes, and be integrated with jobs, transport, infrastructure, services and liveability outcomes. They should be supported by coordinated agency roles, clear accountability, and defined responsibilities between State and local government in different situations and places.

## **Housing Diversity Required**

Sydney needs an integrated spatial strategy that embeds housing within an inclusive growth framework.

Housing targets should incorporate diversity and affordability outcomes and be integrated with jobs, transport, infrastructure, services and liveability outcomes. They should be supported by coordinated

agency roles, clear accountability, and defined responsibilities between State and local government in different situations and places.

Renaming the **'Housed'** priority to **'Well Housed'** would better reflect the Priority's desired outcome. *Well housed* would better inform planners and other stakeholders of the need for housing policies, plans and actions that respond to the full diversity of housing types, dwelling sizes, affordable price points and tenures required to meet the community's diverse household needs.

SSROC welcomes and supports Response 2.3 to investigate planning control incentives relating to housing diversity and requirements for family-friendly apartments in mid- and high-rise residential development.

Appendix 2 of this submission sets out a detailed policy rationale for elevating affordable rental housing supply to a core strategic response of Greater Sydney's metropolitan planning with its own supply targets. This expands significantly on Response 3. Treating this housing market segment as separate and distinct is supported. Recognising it as essential infrastructure will ensure a suite of dedicated actions are driving the most challenging part of the Plan's housing ambition, "to give all Sydney residents access to diverse, well-located affordable homes<sup>1</sup>." New supply of affordable rental housing needs for low- and moderate-income renting households requires separate measures to those for market supply.

### **Feasibility Challenges**

The Government's top-down approach of simply increasing planned capacity by lifting building control limits in close proximity to stations and town centres has not considered the feasibility of developing under those increased controls. Many developments continue to be financially unfeasible given the cost of purchasing land and the ever-increasing costs of construction. Some Government initiatives intended to reduce the cost of housing are having the opposite effect, leading to increased costs of land purchase which add to the feasibility challenge.

Local governments have no control over these factors and it is disappointing to see state governments holding local governments to account over matters they have no control over. The plan focusses on more housing where infrastructure is provided, however it should also consider where developments are financially feasible or intervening with direct incentives to increase financial feasibility of developments.

### **Infrastructure Gaps**

No comprehensive infrastructure strategy is evident, leaving councils lacking funding and responsibility for essential services and upgrades. The lack of infrastructure planning results in infrastructure having to be retrofitted later at higher costs, often through state or local infrastructure levies which add to the cost of housing, affecting feasibility and impacting attempts to address the housing crisis. The State Government should lead major infrastructure investments and plan for them well ahead of time so that land is reserved and downward pressure on infrastructure costs is maintained.

Transport infrastructure, for example, is raised as a key theme through the "Connected" Priority, however, there is no related response to the priority and no long-term transport plan included. The transport planning diagrams simply show what exists today with no consideration of long-term planning. The government may be reluctant to include transport plans as there may be expectation of funding them, but excluding transport plans altogether simply increases the cost of retrofitting it later. Numerous transport connectivity ideas exist, such as the Strathfield-Kogarah connection, or Metro extensions to the south-eastern suburbs, yet none of them are included in the Plan.

It is helpful that waste and resource recovery infrastructure is raised in relation to the priorities "Connected" and "Coordinated", as well as in *Response 5 Aligning Infrastructure to Planned Growth*.

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<sup>1</sup>The Plan, p21.

Waste infrastructure is essential, needs to be well-located and provide sufficient capacity to accommodate Sydney's growth. A discrete section within Response 5 would help to elevate this aspect of planning, which has historically been neglected, leading to the current risk of an impending landfill crisis. This issue is further addressed in Appendix 3.

### **LSPS Statutory Weaknesses**

Implementation rests substantially on updated Local Strategic Planning Statements (LSPS) allowing an important role for Local Strategic Planning. This can be a major strength in terms of simplifying the strategic planning hierarchy and promoting a place-based finesse in delivering housing capacity.

Councils have been required to prepare LSPSs and will be required to update them again (according to the New Approach to Strategic Planning Discussion Paper).

However, Councils are concerned about the lack of statutory weight afforded to them in the envisioned role. In many cases they have simply been ignored or over-ridden with the introduction of TOD and LMR areas, and decisions by agencies such as the Housing Delivery Authority.

These actions erode local planning authority at the strategic level, cause inefficiencies in the development approval process and lead to costly negotiations during development applications. For example, the funding of infrastructure that was not contemplated in the LSPS and is now required as a result of state government over-riding the LSPS, means that Councils are left to negotiate the funding of that infrastructure themselves. This cost is passed on the purchasers meaning that the costs of housing increase yet again.

The lack of statutory backing for LSPSs diminishes the relevance of terms such as "strategic merit" as that merit is based on flexible interpretations rather than robust evidence. It also makes local priorities difficult to defend as, even though they may be included in an endorsed LSPS, those priorities are often being ignored or overridden by state priorities. For example, the preservation of local industrial land in area such as the Inner West is a major local matter, however land identified for local services has been identified for housing only.

The recommended addition of a *placemaking* as a regional priority used to drive and shape the Sydney Plan will help to provide added import and statutory status for revised LSPSs as distinctive place-based statements.

### **Clearer Resilience and Cultural Focus**

Environmental resilience actions are vague and appear to read as an afterthought. There are limited actionable state policies supported by funding to address climate resilience and sustainable building, and no strategies to improve support in the Plan. The Disaster Adaptation Plan is a plan for a plan and lacks substantive measures to address local hazards. The expanded urban footprint appears to continue to put more population in high hazard areas which may be cheap to develop now, but which will become expensive problems in the future.

The recently exhibited EIE for *Climate Change and Natural Hazards SEPP* should substantially help to address these issues. The final Sydney Plan should reflect the adopted policy directions and land use constraints arising from the SEPP.

Additionally, resilience is too narrowly focused on natural hazards in the Plan, it should be expanded to include a focus on:

- System risks such as the network of infrastructure needed to support Sydney's growing population and support Sydney's transition towards a circular economy (see Appendix 3 for more detail).

- Improving food security for the Sydney region including planning that identifies and protects peri-urban agricultural lands in western Sydney<sup>2</sup> to compliment future housing growth and ensure local food supply even during major supply chain disruptions, this action needs to be led by the NSW Government. A 2015 Report<sup>3</sup> investigated the vulnerability of Sydney's food supply and identified that 20% of Sydney's food is grown locally which could be reduced to as low as 6% by urban growth if critical agricultural farms in Sydney are not protected.
- Cultural cohesion which is a key feature of resilient cities and should be considered in the Plan, by ensuring that Sydney's housing growth is supported by the NSW Government leading planning for access to essential services and infrastructure across Sydney's diverse communities.

Aboriginal Outcomes are included as a priority however appear to be largely symbolic as there are no actions attached and no description of what those outcomes may be, or how they should be delivered. The plan's high-level statements on self-determination and country recognition lack practical frameworks for local application, noting that effective cultural planning requires long timelines, conflicting with the Plan's rapid implementation pace.

The recommended addition of a placemaking priority would help facilitate the translation of this outcome into the Sydney Plan and more nuanced spatially specific LEPs.

## Engagement

The Sydney Plan will be delivered across the 33 local government areas of Sydney. Consultation and collaboration across the region is essential to ensure the plan adequately captures the land-use requirements for Sydney to grow in a sustainable, inclusive and resilient way. While councils have been allocated actions in the Plan, formal engagement with councils has been unclear and appears inadequately resourced by DPHI.

Collaboration with Local Government is pivotal to the successful development and implementation of the Plan and engagement undertaken to date is not well articulated, nor is future engagement clearly planned.

## 4. General Recommendations

SSROC considers that the draft Sydney Plan is a solid starting point however can be significantly improved by including the following items.

### 1. New Plan Priority of Placemaking

Include an additional *placemaking* priority to order the Plan and plans in the other planning tiers to transparently enable the successfully integration and weighting the other seven existing priorities.

### 2. Add the Vision for Sydney and other key missing Planning elements

Include key missing elements of a strategy into the Plan, including a vision for the future of Sydney, detailed spatial structure, detailed description of the intended outcomes for each priority, clear guidance for Councils who will implement the next level of planning through updated LSPs, and each priority having at least one direct response to address it.

### 3. Better Articulate Actions and Government Agency Responsibilities

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<sup>2</sup> See: <https://wsroc.com.au/media-a-resources/releases/population-growth-development-eating-sydney-food-belt>  
<https://www.uts.edu.au/news/2022/09/western-sydney-foodbowl-being-lost-development>

<sup>3</sup> See: <https://www.sydneyfoodfutures.net/> and <https://impact.economist.com/projects/foodsustainability/blogs/australias-food-bowls/>

Include more detail on the short-term actions and consider extending the timeframe to 2031 (5 years from now), and include medium and long-term actions for state government, Councils and other agencies.

#### **4. Include Long Term Growth and Job Targets**

Include longer term housing and jobs targets in the Plan to enable effective planning for the growth of Sydney (extend the housing and employment targets beyond 5 years). Data should also include approvals vs commencements, and other forms of housing supply not currently tracked such as student accommodation or co-living developments.

#### **5. Inclusion of Targets for Diverse Housing Outcomes**

Include housing target subsets that match diversity and affordability outcomes needed by current and future residents. A supply of just expensive luxury housing options will not solve the housing crisis nor keep the next generation from leaving Sydney. Older residents need to be able to securely age in place.

#### **6. Better manage housing project feasibility**

Consider feasibility constraints when considering planned housing capacity. This may mean allowing Councils to include feasibility constraints in their LSPSs, for example a particular TOD or LMR precinct may have a certain theoretical capacity, however that may reduce when feasibility is considered. Look to dampen unhelpful land price speculation driven through the planning rezoning announcement process.

#### **7. Provision of long-term Transport and Infrastructure Plans**

Develop long-term infrastructure plans and include them in the Sydney Plan, particularly major transport infrastructure to align with the “connected” priority, which currently has no direct response. Because of the lack of a singular custodian on regional waste infrastructure the Plan should include the development of waste and resource recovery infrastructure plans identifying new locations for sites and precincts for servicing the region.

#### **8. Greater status for Local Strategic Plans**

Increase the statutory weight afforded to LSPSs when endorsed by the Government. The alignment of a proposal with the LSPS (or lack thereof) should be a key consideration when assessing strategic merit of that proposal, particularly when a LSPS aligns with the Sydney Plan’s Priorities and responses.

#### **9. Strengthen the capacity of Councils to prepare their integrated place-based plans**

Resources will be needed to update local plans. The review of LSPSs should be supported by funding from the Government, along with funding for precinct master planning, local industrial land strategies, affordable housing contributions schemes, contributions frameworks to achieve the proposed time frames. Government should also consider direct funding of interventions that lead to more housing supply without increasing housing costs.

#### **10. Articulate actions on resilience planning for climate adaptation**

The Plan should include clearer actions on resilience planning for climate adaptation including flood mitigation and sustainable energy building measures, as well as the development of actionable policies to address hazards, resilience and environmental outcomes. This should be co-ordinated with the *Climate Change and Natural Hazards SEPP*.

#### **11. Consult on regional Aboriginal place-based outcomes**

The Plan should include a clear response to the Aboriginal Outcomes priority, including a description of the intended outcomes and key actions for state and local government agencies to ensure that this priority is implemented.

#### **12. Engagement with Local Councils**

Establish structured and transparent engagement with Greater Sydney councils in the next steps of the Plan's development and so clarify how actions allocated to councils will be resourced. Importantly this will clarify how councils will be involved in the development and co-ordination of the Sydney Infrastructure Opportunities Plan.

## 4 Detailed Comments

### Placemaking

Further detailed recommendations around this issue along with the supporting rationale are contained in Appendix 1.

### Detailed Place making Recommendations

It is recommended that:

1. The *NSW Approach to Strategic Planning* include placemaking as a guiding system-wide Priority.
2. The draft *Sydney Region Plan* include placemaking as a distinct strategic priority that helps to integrate the Plan's other priorities.
3. LSPS, LEPs, Precinct Master Plans, State Significant Precincts and proponent-led SSD rezonings demonstrate how place-making principles are applied.
4. NSW Government commits to fund and resource local councils to review and revise local planning documents, where required, to deliver and implement high quality placemaking to guide housing and urban growth at the outset of the adoption of the Sydney Region Plan.

### Affordable rental housing

Affordable rental housing is essential metropolitan infrastructure. The Sydney Region Plan provides a critical opportunity to embed affordable housing as a permanent, large-scale component of metropolitan growth, delivered in partnership with Community Housing Providers and retained in perpetuity. Planning mechanisms coupled with land use policy commitments will ensure a strong pipeline of affordable housing projects is continuously delivered in step with Sydney's population growth.

The introduction of a transparent and real-time Affordable Housing Register will further strengthen accountability, policy integrity and delivery outcomes across Greater Sydney.

Appendix 2 contains a set of detailed recommendations around this issue along with a supporting rationale.

### Detailed Affordable Housing Recommendations

1. Adopt Affordable Rental Housing as a core strategic priority.
2. Set a metropolitan target of at least 7.5% retained in perpetuity.
3. Extend AHCS across Greater Sydney.
4. Ensure local control of schemes.
5. Prioritise perpetuity, including on all government land.
6. Apply adopted AHCS to HDA SSD projects.
7. Provide funding and resources to Councils for new schemes and extensions to existing schemes.
8. Launch the Affordable Housing Register by 1 July 2026 as a real-time monitoring and transparency tool.
9. Embed CHP partnerships and HAFF financing as central delivery mechanisms.

10. Adopt an Implementation Strategy and Plan for affordable housing delivery.

### **Waste and resource recovery infrastructure**

Adequate waste and resource recovery infrastructure at all points in time is fundamental to Sydney's resilience, environmental performance, economic functioning and public health.

Given the long lead times required to identify, approve and construct major facilities, failure to safeguard suitable locations now will create irreversible metropolitan capacity constraints in future decades.

Embedding long-term planning horizons and stronger interagency spatial coordination within the Region Plan will help to ensure sufficient system capacity, reduce transport costs, support circular economy outcomes, provide investment certainty and strengthen metropolitan productivity and resilience.

Elevating waste infrastructure to a specific strategic priority response within the Sydney Region Plan will help to ensure long-term disposal capacity, facilitate investment, reduce transport costs and emissions, support circular economy outcomes and transitions, provide investment certainty, protect scarce industrial land, and strengthen metropolitan resilience.

Appendix 3 contains a set of detailed recommendations around this issue along with a supporting rationale.

### **Detailed Waste and resource recovery infrastructure recommendations**

The Region Plan should include actions to:

1. recognise waste and resource recovery infrastructure as essential metropolitan infrastructure
2. embed 10–20-year planning horizons for all infrastructure
3. integrate waste infrastructure and resource recovery planning with industrial land protection frameworks and housing, transport and utilities sequencing
4. protect freight-connected industrial lands identified and safeguard future strategic locations
5. secure sufficient rail/freight-connected industrial sites for long-term waste logistics for Greater Sydney
6. publish rolling metropolitan infrastructure outlooks.

## **5 Conclusion**

Thank you for the opportunity to provide feedback on the draft *Sydney Region Plan*.

***Sydney needs a long-term strategic plan. The draft Sydney Plan is overly focused on shorter-term announced reforms.***

SSROC welcomes the renewed emphasis on strategic planning reflected in the draft Sydney Plan and recognises the intent to reset Sydney's strategic direction.

However, as currently framed, the draft Plan functions primarily as a shorter-term policy and reform statement of progress. It does not yet provide the coherent, integrated long-term spatial framework required of a global city to guide growth, coordinate infrastructure investment, and embed housing within broader economic and place outcomes. This will hinder rather than support consistent, long-term delivery. A clear long-term strategy is essential to provide certainty for SSROC and other communities in Greater Sydney, government and investors about how land use, housing, employment and infrastructure decisions fit together over time.



The draft Sydney Plan does not include 10- and 20-year housing and job targets to enable the cost effective and orderly delivery of land use plans integrated with infrastructure funding and delivery. These are an important missing foundation.

Critical elements are not resolved - including the long-term spatial vision and structure, centres strategy, metropolitan rural area, infrastructure opportunity plans, disaster adaptation plans and further actions to fulfil the climate and sustainability objectives.

SSROC, and other ROCs, play a key role in co-ordinating strategic planning across member local governments. We understand that the next significant strategic planning task for Councils will be to update their LSPSs. With that in mind, and noting our recommendation to increase the statutory weight afforded to LSPSs, we would like to request a meeting with the relevant Department staff, at the right time, to discuss initiatives that could improve the usefulness and strength of LSPS's as part of the planning framework, and the provision of consistent guidance to Councils as they review their LSPS in coming years.

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](mailto: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**

## Appendix 1 Inclusion of Placemaking as a Distinct Priority in the Draft Sydney Region Plan and the NSW Approach to Strategic Planning

### Purpose

This Appendix recommends that *placemaking* be adopted as a distinct and explicit priority within:

- The *NSW Approach to Strategic Planning* (as a guiding, system-wide priority)
- The draft *Sydney Region Plan*; and
- Local plan making.

This would align with established NSW Government planning and design frameworks including Greener Places, the Design Quality SEPP and Apartment Design Guide, Connecting with Country, and Government Architect NSW (GANSW) place-based planning and design excellence principles.

Elevating placemaking to a system-wide priority will strengthen the capacity 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.

Housing growth must be matched by high-quality place-making, including family-friendly and culturally appropriate housing, good design and protection of neighbourhood amenity.

### Making Placemaking as a forward-Looking, delivery-critical and engagement-led Priority

Placemaking as a priority in the *Sydney Region Plan* should be explicitly framed as innovative, forward looking, delivery-critical and engagement-led, positioning place-based planning as a key enabler of Sydney's next phase of growth.

With strong population growth, major job creation and increasing density across strategic centres, corridors and renewal precincts, placemaking provides the framework to ensure density is delivered well; supporting high-amenity, high-productivity and highly liveable places. A forward-looking placemaking priority would encourage new models of mixed-use development, flexible and adaptive public spaces, contemporary public domain design, and integration of emerging work, learning and community uses.

Importantly, without the hard work of rigorous placemaking, precinct-level master planning and the critical testing of ideas with communities, businesses and other stakeholders, many of the Region Plan's future-facing intentions are unlikely to be fully realised.

In the absence of strong place frameworks and engagement, growth risks defaulting to fragmented, site-by-site development driven primarily by yield and market timing, resulting in poorer public domain outcomes, weaker centre identity, reduced community acceptance and missed opportunities to leverage density for economic, social and environmental benefit.

Early and meaningful testing of place concepts with local communities and business stakeholders strengthens place quality, improves deliverability and builds confidence that growth and change will contribute to coordinated, investable and genuinely valued places.

### Strategic Policy Alignment and System Rationale

#### *Placemaking as a system-wide Strategic Priority*

Embedding placemaking as a guiding priority would provide a consistent, whole-of-system mandate for place-based planning, strengthen alignment between regional plans, LSPS, LEPs and precinct planning, improve consistency across State-led and council-led pathways, and elevate place outcomes alongside housing supply, infrastructure coordination and economic productivity.

#### *Placemaking as a consistent thread across all Strategic Planning scales*

Making placemaking a strategic priority across the three levels of the NSW planning system — from a State-wide spatial land use framework, to Region Plans (including the Sydney Region Plan),

through to Councils' LSPSs and LEPs would ensure that placemaking operates coherently at multiple spatial scales.

At the State level, placemaking would inform broad spatial structure, centre hierarchies, growth area strategies and infrastructure sequencing. At the regional level, it would guide how growth, renewal and infrastructure investment are translated into place-based outcomes. At the local level, LSPSs and LEPs would give practical effect to this priority through detailed place narratives, character frameworks and precinct-specific planning.

This multi-scalar approach would establish placemaking as a consistent thread through the planning system, supporting systematic application of good practice and improving alignment between strategic intent and statutory delivery.

### ***Placemaking as the Spatial Integrator of the Region Plan's Strategic Priorities***

Positioning placemaking as a strategic priority would enable it to operate as transparent a spatial integrator of the Region Plan's other priorities, ensuring that housing, jobs, infrastructure, transport, climate resilience, greening, heritage and community wellbeing are delivered through coordinated place frameworks rather than isolated policy themes.

#### *Alignment with Greener Places and Place-Based Outcomes*

Placemaking as a priority would reinforce place-based planning, urban greening, blue-green infrastructure and high-quality public spaces, embedding place outcomes early in growth area structure planning and rezoning processes. Climate change and natural risks vary across the state and require tailored place-based approaches at the local level.<sup>4</sup>

#### *Strengthening Design Quality SEPP and GANSW Outcomes*

Placemaking would extend design quality objectives to the place and precinct scale, ensuring coordinated planning of built form, public domain, landscape and movement networks.

#### *Embedding Connecting with Country*

Placemaking would recognise Country as a foundational element of place, strengthening expectations for early and meaningful engagement with Aboriginal stakeholders and integration of Aboriginal cultural values.

#### *Sensitive to local character and heritage*

Housing growth needs to be matched by high-quality place-making that helps makes a place distinctive, including family-friendly and culturally appropriate housing, good urban design that incorporates heritage and local character, and protection and enhancement of neighbourhood amenity.

#### *Application to State Significant Precincts*

Placemaking would require State Significant Precinct Master Plans to explicitly demonstrate place-based analysis, public domain structure and coherent place visions rather than primarily yield-driven outcomes.

#### *Application to HDA Proponent-Led SSD Residential Developments*

Place-making would ensure proponent-led SSD residential developments with concurrent rezonings are assessed against updated LEPs and master plans prepared to reflect this priority, strengthening governance and ensuring high-quality place outcomes.

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<sup>4</sup> "Heat impacts are and will continue to be unevenly distributed across the State. In recognition of this, planning responses should be adaptable and place based. Consideration of heat in planning policies is still relatively new and currently limited to a small number of state and local strategic plans and planning controls." Climate Change and Natural Hazards State Environmental Planning Policy EIE 2026, page 5.

**Strengthen the capacity of Councils to prepare the integrated place-based plans needed to deliver the Plan.**

Council resources will be stretched to rapidly improve local strategic planning statements, local industrial land strategies, affordable housing contributions plans, natural hazard modelling and precinct master-planning in-line with Plan priorities.

Additional Government funding and resourcing of local councils will be required to implement these concurrent priority activities.

**Recommendations**

It is recommended that:

5. The *NSW Approach to Strategic Planning* include placemaking as a guiding system-wide priority.
6. The draft *Sydney Region Plan* include placemaking as a distinct strategic priority that helps to integrate the Plan's other priorities.
7. LSPS, LEPs, Precinct Master Plans, State Significant Precincts and proponent-led SSD rezonings demonstrate how place-making principles are applied.
8. NSW Government commits to fund and resource local councils to review and revise local planning documents, where required, to deliver and implement high quality placemaking to guide housing and urban growth at the outset of the adoption of the Sydney Region Plan.

**Conclusion**

Elevating place-making to a distinct Plan Priority will strengthen delivery of high-quality, distinctive, culturally informed and climate-responsive places that support Greater Sydney's long-term liveability and productivity.

## Appendix 2: A Stronger Affordable Rental Housing Response in the Sydney Region Plan

This Appendix sets out a detailed policy rationale making the case that the Sydney Region Plan should elevate affordable rental housing supply to a core strategic priority of Greater Sydney's metropolitan planning.

It welcomes the Response 3 in the draft Sydney Region Plan and seeks to build upon it by providing:

- A detailed policy rationale that links to the established evidence base for prioritising affordable rental housing as part of overall housing supply. This will institute a strong alignment with the NSW Government response to the NSW Parliamentary Inquiry into *Housing Options for Essential Workers and its evidence base*.
- A metropolitan target, supporting local targets, and a strategy and action plan for scaling delivery across Greater Sydney.
- A clear policy position on the extension, governance and application of Affordable Housing Contribution Schemes (AHCS) as planning measure, including their application to all HDA SSD proposals.
- A delivery framework centred on partnerships with Registered Community Housing Providers (CHPs).
- Specific implementation recommendations, including funding and resources for Councils and the commencement of the Affordable Housing Register by 1 July 2026 by the NSW Community Housing Registrar.

### Why Affordable Rental Housing Must Be a Core Priority

Despite significant rezonings and dwelling approvals across Greater Sydney, rental stress remains acute, particularly for essential workers, moderate-income households, older women, single-person households and lower-income key workers.

Increasing overall dwelling supply does not automatically translate into affordable rental outcomes for low- and moderate-income households. Market supply is predominantly delivered at price points unaffordable to these cohorts.

Affordable rental housing must therefore be treated as essential metropolitan infrastructure that is fundamental to economic productivity, labour market stability, service delivery, social cohesion and intergenerational equity.

### Alignment with the NSW Parliamentary Inquiry into Housing Options for Essential Workers

The NSW Parliamentary *Inquiry into Housing Options for Essential Workers* emphasised the need for increased affordable rental supply, the importance of planning mechanisms, the role of community housing partnerships and the necessity of long-term affordability.

This Appendix reflects and supports those recommendations by:

- Calling for metropolitan-wide affordable housing targets.
- Supporting extension of Affordable Housing Contribution Schemes.
- Embedding affordable rental housing within land-use planning.
- Prioritising long-term affordability in perpetuity.

## 4. Social and Affordable Housing Targets for Greater Sydney

The Sydney Region Plan should establish an aspirational long-term affordable housing Metropolitan target:

**At least 7.5% of net new housing supply** should be delivered as affordable rental housing for low- and moderate-income households, retained in perpetuity.



This would support and contribute to the NSW supply targets in National Housing Accord.

This target would be contributed to through a range of mechanisms over the life of the Plan:

- New affordable housing supply on HOMES NSW redevelopment sites along with social housing
- Provision of surplus Government land to social and affordable housing as part of all mixed housing projects
- Key worker housing funded by NSW Government for Government employees
- Concessional sale or gifting of surplus council land to affordable housing as part of all mixed housing projects
- Private developer contributions to council Affordable Housing Contribution Schemes for affordable housing in perpetuity. This would include the incorporation of all rezoned lands (State led rezonings and private proponent led concurrent rezoning of SSD projects).
- Policy mechanisms and incentives for developers to convert temporary affordable housing delivered through the infill bonus in the Housing SEPP to long term affordable housing
- Registered CHPs attracting finance to affordable housing projects utilising the Housing Future Fund

#### *Meeting Local Workforce and Community Needs:*

Essential workers should be broadly defined to include health workers, teachers, cleaners, child care workers, aged care workers, disability support workers, and retail and hospitality staff.

Embedding affordable housing locally supports economic resilience, reduces commuting pressures, strengthens service delivery and promotes complete communities.

#### *Local Targets:*

Councils should be empowered to establish local evidence-based affordable housing targets based on Local Housing Strategies, calibrate contribution rates to ensure feasibility, identify priority precincts near employment and services, and review schemes periodically.

### **Extending Affordable Housing Contribution Schemes Across Greater Sydney**

Affordable Housing Contribution Schemes (AHCS) should be extended to all Greater Sydney to ensure policy consistency, equity, certainty and a clear pipeline of affordable housing contributions.

Schemes must be feasibility-tested, transparent and periodically reviewed.

SSROC strongly endorses the draft Plans Responses 3.1 and 3.3 for every metropolitan council having an affordable housing contribution scheme established by 2027 with the support of a new Affordable Housing Contribution Scheme toolkit.

Resources and approval processes should help to fast track the current often slow process of adoption and approval. It should enable councils to readily extend their existing schemes to additional precincts not currently included.

### **Launching the Affordable Housing Register**

The Affordable Housing Register should commence by 1 July 2026 as a central mechanism for monitoring affordable housing delivery against targets across Greater Sydney.

The Affordable Housing Register would:

- Monitor affordable housing targets in real time at metropolitan, regional and local levels.

- Track dwellings secured through contribution schemes, rezonings and government land projects.
- Record tenure type, managing provider and perpetuity status.
- Provide transparent reporting to communities, Councils, developers and government.
- Support compliance monitoring and covenant enforcement.
- Provide evidence for feasibility calibration and policy refinement.

A publicly accessible reporting interface would increase transparency and accountability, providing certainty to developers regarding contribution expectations and demonstrating to communities that affordable housing commitments are being delivered.

Real-time monitoring would strengthen policy credibility, support evidence-based decision-making and enable early intervention if targets are not being met.

### **Local Control and Governance**

Affordable housing contribution schemes should be locally controlled by Councils and embedded in statutory planning instruments.

Local control ensures responsiveness to housing needs and strong partnerships with Community Housing Providers.

### **Lock In Perpetuity Over Temporary Affordable Housing options**

Affordable housing delivered in perpetuity must take precedence over time-limited models. The housing problem is a long term one requiring a long-term response that grows supply over time.

All affordable housing delivered on Commonwealth, State or local government land must be secured in perpetuity. Public land is a finite strategic asset and must maximise long-term public benefit rather than short-term yield.

As an adjunct to the Housing SEPP consider developing a State-funded Affordable Housing Scheme Acceleration Program that enables time-limited affordable housing to be converted to longer term affordable housing.

### **Application to HDA SSD Projects**

Where an adopted Affordable Housing Contribution Scheme applies, it should guide affordable housing contributions required by HDA SSD projects through a clear state policy or Ministerial Direction to capture uplift some of the windfall gains from concurrent rezonings.

## **10. Delivering at Scale: Partnership with Registered Community Housing Providers**

Affordable rental housing should be delivered at scale in partnership with registered Community Housing Providers (CHPs), who:

- Retain and manage affordable housing in perpetuity.
- Maintain strong governance and compliance frameworks to ensure good tenant outcomes.
- Leverage Commonwealth financing mechanisms, including borrowings supported by the Housing Australia Future Fund (HAFF).
- Reinvest surpluses into additional affordable housing supply.

This partnership model ensures long-term affordability, professional tenancy management, financial leverage beyond development contributions and reduced risk of affordable housing being lost over time.

## Key Recommendations

1. Adopt Affordable Rental Housing as a core strategic priority.
2. Set a metropolitan target of at least 7.5% retained in perpetuity.
3. Extend AHCS across Greater Sydney.
4. Ensure local control of schemes.
5. Prioritise perpetuity, including on all government land.
6. Apply adopted AHCS to HDA SSD projects.
7. Provide funding and resources to Councils for new schemes and extensions to existing schemes.
8. Launch the Affordable Housing Register by 1 July 2026 as a real-time monitoring and transparency tool.
9. Embed CHP partnerships and HAFF financing as central delivery mechanisms.
10. Adopt an Implementation Strategy and Plan for affordable housing delivery.

## Strategy and Action Plan

A clear metropolitan affordable housing strategy and implementation plan is essential to translate affordable rental housing targets into real, measurable delivery. Without a defined pathway that includes: roles, responsibilities, sequencing and timeframes, the targets risk becoming symbolic rather than actionable.

Establishing a clear, resourced coherent strategy ensures that the intent expressed in the Sydney Region Plan is operationalised through coordinated commitments across State Government, local councils, CHPs and the development sector.

It also strengthens accountability by identifying which agency is responsible for each component of delivery, how progress will be measured, and when specific milestones must be achieved. This is particularly important given the wide range of mechanisms involved: planning contributions, government-led development, CHP partnerships, use of public land, and state-level coordination functions such as the Affordable Housing Register.

A structured approach also provides the predictability and confidence needed for industry, investors and CHPs to plan pipelines of affordable rental housing.

Timeframes for establishing and extending contribution schemes, integrating requirements into HDA SSD projects, delivering Government-land projects, and launching the Affordable Housing Register enable sequencing and alignment with financing cycles such as the Housing Australia Future Fund.

A coordinated plan provides the governance, tools and accountability required to convert policy ambition for this essential infrastructure into a sustained, system-wide lift in affordable rental housing supply.

## Conclusion

Affordable rental housing is essential metropolitan infrastructure. The Sydney Region Plan provides a critical opportunity to embed affordable housing as a permanent, large-scale component of metropolitan growth, delivered in partnership with Community Housing Providers and retained in perpetuity. Planning mechanisms coupled with land use policy commitments will ensure a strong pipeline of affordable housing projects is continuously delivered in step with Sydney's population growth.

The introduction of a transparent and real-time Affordable Housing Register will further strengthen accountability, policy integrity and delivery outcomes across Greater Sydney.

## Appendix 3 Waste Infrastructure as a Strategic Response in the Sydney Region Plan

### Purpose

This appendix sets out the case for elevating waste infrastructure to a formal strategic response within the Sydney Region Plan. It should form a discrete section in *Response 5 Aligning Infrastructure to Planned Growth*.

Greater Sydney's continued growth, dwindling landfill capacity, industrial land pressures, and increasing waste logistics complexity mean that passive or fragmented approaches to waste planning are no longer sufficient. Long-term spatial safeguarding of waste infrastructure is necessary to ensure metropolitan resilience, environmental performance, and service continuity.

The Appendix provides:

- the strategic rationale for prioritising waste infrastructure
- evidence of future landfill and processing capacity requirements
- clarification of shared responsibilities across State, councils and industry
- recommendations for securing freight- and rail-connected sites and other priority action responses.
- an assessment of risks, if suitable sites are not secured

### Waste Infrastructure is Essential Metropolitan Infrastructure

Waste management systems function as continuous essential public infrastructure, comparable to water, energy, or transport systems. Waste generation cannot be deferred, and interruptions to processing or disposal capacity rapidly create public health risks, environmental harm, emergency logistics pressures, and rapid cost escalation. This essential infrastructure status accords with Government directions in the NSW *Waste and Circular Infrastructure Plan*<sup>5</sup>.

Because major waste facilities typically require 8–15 years for planning, approval and delivery, spatial planning decisions made now determine system performance decades ahead. The 20-year Region Plan should therefore explicitly recognise waste infrastructure as essential metropolitan infrastructure requiring long-term land-use safeguarding. Given the long lead times it needs to be a priority action.

### Recommendation

The Sydney Plan and the prospective State Land Use Plan refer to waste and recycling collection services and related processing infrastructure as part of essential services and so inform all state, regional and local planning decisions.

### Population Growth and Waste Demand

Greater Sydney's projected population growth will drive sustained increases across municipal, commercial, construction and specialised waste streams.

Even under strong circular-economy scenarios, absolute waste volumes remain substantial due to population scale and infrastructure construction cycles. Residual disposal capacity therefore remains an unavoidable system requirement as Sydney grows. The population is set to grow by 1.2 million, 23%, over the next 20 years.

SSROC member councils manage around 655,000 tonnes of household waste each year, which is about 20 per cent of all NSW household waste. Municipal waste generation in the SSROC region is

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<sup>5</sup> Minister Sharpe stated in the NSW *Waste and Circular Infrastructure Plan* that red lid bin waste services are an “essential service for everyone”, and in the event of a disaster that planning solutions consider “ways to designate waste collection services as essential” when releasing or rezoning land for housing (pages 6,16, 23).



expected to increase by 24 per cent over the next 20 years to 805,000 tonnes in 2039/2040.1 Residual mixed waste is expected to grow to 435,000 tonnes in 2040.

Sydney's remaining landfill airspace is finite and tightening. Strategic modelling consistently indicates metropolitan landfill capacity is projected to decline significantly over the next 10-15 years, while reliance on distant regional facilities is increasing.

Even with strong resource recovery outcomes, landfill remains necessary for residual post-processing waste, contaminated materials, non-recoverable industrial waste, disaster debris, and contingency capacity. A resilient metropolitan system therefore requires both expanded recycling infrastructure and sufficient long-term residual disposal capacity.

The Plan's strong short-term housing delivery focus risks under-representing longer-term metropolitan infrastructure requirements that operate on 10–20 year planning cycles. Waste and resource recovery infrastructure depends heavily on early site identification, corridor protection, freight alignment and industrial land reservation.

Effective metropolitan planning requires coordinated interagency delivery across:

- housing growth locations
- transport infrastructure
- open space systems
- utilities servicing
- essential metropolitan infrastructure.

Embedding waste and resource recovery infrastructure within this integrated framework supports efficient freight movements, reduced long-distance transport, improved infrastructure sequencing and stronger metropolitan productivity outcomes.

### **Translating growth in waste into geo-spatial and integrated land use planning**

**Both the Sydney Region Plan and the Industrial Lands Policy seek to identify the land use strategy relative to land availability.**

Essential for undertaking this task in the waste sphere, is a geo-spatial waste infrastructure delivery roadmap. The roadmap will need to show waste generation and service provision scenarios based on housing and industry growth, the waste material generated and planned circularity flows over the 20-year life of the Plan.

For example the Victorian Recycling Infrastructure Plan used material flow and population projections to inform spatial insights and mapped zones where future resource recovery, transfer stations and waste management infrastructure will be needed. This state driven approach provided clarity for industry, councils and the community.

### **Recommendation**

A Priority Response in the Sydney Plan must be the completion of the NSW *Waste and Circular Infrastructure Plan*, including a geo-spatial waste infrastructure delivery roadmap, by 2027.

### **Industrial Land Pressures and the Need for Protection**

Waste facilities face intensifying competition for industrial land across Greater Sydney, particularly rail-served and freight-accessible sites. Many suitable locations are being displaced by higher-value logistics or redevelopment pressures.

These locations are increasingly sought for logistics warehousing, distribution centres, and redevelopment transition. Waste infrastructure requires large footprints, long operational certainty, freight access, and separation buffers, making early safeguarding essential.



Because these facilities require such large footprints, buffers and multi-decade certainty, they must be recognised as core strategic regional industrial land uses through a new Industrial Lands Policy but also proactively protected within long-term metropolitan land use planning and by governance and investment decisions.

### **Shared Responsibility Across Government and Industry to provide investment certainty**

Waste infrastructure delivery depends on coordinated roles across the NSW Government, local councils, and the private sector.

State agencies provide policy, licensing, approvals pathways and strategic monitoring. Councils provide municipal collection services, recycling programs, transfer infrastructure and local planning input. The private sector delivers most major capital investment in facilities and logistics systems.

The Plan is silent on allocating the delivery role and ongoing accountability, and integration of State Government departmental targets.

Key land managers such as Transport for NSW, Infrastructure NSW, Treasury NSW, Department of Energy, Environment, Climate Change and Water, and NSW Environment Protection Authority will all play a role and should be assigned delivery responsibilities. Role assignment in the Sydney Plan should facilitate interdepartmental coordination and the monitoring of targets.

Being the only level of government that actually delivers kerbside waste services, the Region Plan should clearly position councils as delivery partners within a coordinated metropolitan waste system while providing investment certainty for industry.

To reinforce and integrate these directions, it is proposed that the Sydney Region Plan reference the *NSW Waste and Circular Infrastructure Plan*.

SSROC and member councils have an acute stake in the outcome of these policies and are eager to see an integrated, whole-of-government commitment to fast-tracking residual waste solutions.

### **Securing Rail-Connected Waste Infrastructure Sites**

Rail-connected waste infrastructure is increasingly critical to metropolitan efficiency. Rail-served facilities reduce heavy truck movements, lower emissions, support waste consolidation and treatment, reuse and recycling. It could also enable efficient transfer to regional disposal sites and improve freight utilization as well facilitate shifts between waste streams and alternative end uses over time.

SSROC infrastructure and waste material analysis (2021) indicated that out of all the treatment scenarios (after the revocation of the mixed waste organic output exemption), thermal energy from waste (EfW) treatment facilities – either with or without a separate FOGO/FO system – rated the most effective treatment scenario in terms of affordability, reliability, social benefit and environmental concerns. However, EfW was perceived by council representatives to have the lowest community acceptance although many such facilities operate safely around the world.

Recommended actions for the NSW Government include:

- identifying Strategic Waste Freight Precincts in metropolitan Sydney near freight corridors or intermodal terminals by 2027
- reserving suitable government-owned rail-adjacent land by 2027
- protecting rail-served industrial zoning
- funding and developing business cases for selected and reserved sites
- enabling coordinated site assembly mechanisms supported by investment plans, in conjunction with Infrastructure NSW by 2028
- streamlining whole-of-government assessment coordination.

## Risks of Failing to Secure Suitable Sites

Failure to proactively safeguard waste infrastructure and resource recovery locations creates significant metropolitan risks including service continuity failures, escalating transport costs, irreversible industrial land loss, investment uncertainty, emergency resilience risks, and increased planning conflict.

Because equivalent metropolitan sites cannot realistically be recreated once lost, early identification and protection is essential. Waste infrastructure requires large, consolidated sites with multi-decade operational certainty. Once suitable land is redeveloped for incompatible uses, equivalent metropolitan sites cannot realistically be found.

The system currently has no entity to act as a single purchaser of waste infrastructure capable of contracting more effectively with the private sector delivery mechanisms. Individual councils – let alone groups of councils, ROCs or joint organisations – do not have the social licence or investment capital to secure a regionally significant facility in their LGAs.

The NSW Government as the custodian of the waste infrastructure system - the market designer, legislative shaper and regulator - should take lead responsibility for securing sites for this essential infrastructure to facilitate collaboration with the industry and councils around productive and sustainable future delivery.

## Recommended Sydney Region Plan Directions

The Region Plan should include actions to:

- recognise waste and resource recovery infrastructure as essential metropolitan infrastructure
- embed 10–20-year planning horizons for all infrastructure
- integrate waste infrastructure and resource recovery planning with industrial land protection frameworks and housing, transport and utilities sequencing
- protect freight-connected industrial lands identify and safeguard future strategic locations
- secure sufficient rail/freight-connected industrial sites for long-term waste logistics for Greater Sydney
- publish rolling metropolitan infrastructure outlooks
- update Response 11, Action 11.1 for NSW Government to provide greater clarity on priorities for this action such as: *Undertake a Sydney rural lands study to map productive uses including food production, critical infrastructure for essential services such as water, waste, electricity and health and important supply chains beyond the urban footprint.*

## Conclusion

Adequate waste and resource recovery infrastructure at all points in time is fundamental to Sydney's environmental performance, economic functioning and public health.

Given the long lead times required to identify, approve and construct major facilities, failure to safeguard suitable locations now will create irreversible metropolitan capacity constraints in future decades.

Embedding long-term planning horizons and stronger interagency spatial coordination within the Region Plan will help to ensure sufficient system capacity, reduce transport costs, support circular economy outcomes, provide investment certainty and strengthen metropolitan productivity and resilience.

Elevating waste infrastructure to a specific strategic priority response within the Sydney Region Plan will help to ensure long-term disposal capacity, facilitate investment, reduce transport costs and emissions, support circular economy outcomes and transitions, provide investment certainty, protect scarce industrial land, and strengthen metropolitan resilience.