Western Sydney Regional Organisation of Councils Ltd
Suite 201, Level 2, 85 Flushcombe Road
PO Box 63, Blacktown, NSW 2148
Tel (02) 9671 4333 Fax (02) 9621 7741
Email info@wsroc.com.au www.wsroc.com.au

Advocating for the people of Western Sydney

SUBMISSION:

The Sydney Plan

A new approach to strategic planning: Discussion paper

Statewide Policy for Industrial Lands

Western Sydney Regional Organisation of Councils Limited.

February 2026

This document

WSROC thanks the NSW Department of Planning, Housing and Infrastructure for the opportunity to provide feedback on the draft Sydney Plan and supporting documents.

Some of our member councils, and councils participating in relevant WSROC programs, will make their own submissions. This document should be viewed in addition to, and complementary to, those submissions.

We would welcome the opportunity to discuss local government views and requirements further.

Should you have any further questions on this submission, please contact WSROC Acting CEO Judith Bruinsma on (02) 9671 4333 or at judith@wsroc.com.au.

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1. About WSROC

Formed in 1973, the Western Sydney Regional Organisation of Councils (WSROC) represents local government across Greater Western Sydney.

With a reputation for considered policy analysis and bipartisan advocacy, WSROC brings a collective voice to those issues that are crucial for Western Sydney's growing population. WSROC's primary role is to represent the councils and communities of Greater Western Sydney, as well as developing resource sharing and other co-operative projects between Greater Western Sydney councils.

Over the past 50 years, WSROC has developed a strong reputation for bipartisan advocacy, especially in the key areas of economic and social development, job creation, transport and infrastructure, planning, health and the environment, and has proven itself a reliable partner in intergovernmental relations, regional strategic planning, and coordinating joint projects and programs. Current programs include:

- **Waste and Sustainable Materials Program (est 2014)**

  Building on three previous regional strategies, the current Waste and Sustainable Materials Strategy 2022–27 advances waste avoidance, circular economy outcomes and protection of the environment through coordinated council action to divert waste from landfill.
- **Western Sydney Energy Program (est. 2019)**

  Delivers collective energy efficiency and emission reduction outcomes. To date the program has generated over $75 million in savings and reducing emissions by more than 650,000 tCO_2e.
- **Heat Resilience Program (est. 2018)**

  Responds to extreme heat across Greater Sydney by embedding resilience into planning, development and emergency preparedness. The program integrates urban planning tools, policy reform and community initiatives in partnership with councils, state agencies, utilities, industry and universities.
- **Cumberland Plains Conservation Plan Compliance Support & Caring for Country Grants Program (est 2024)**

  Delivered with the NSW Department of Planning, Housing and Infrastructure, including a two-year Caring for Country Grants Program and a 15-month Compliance Strategy Pilot supporting participating councils.

2. Executive summary

This submission has been prepared in close consultation with Western Sydney councils. Our councils are committed to working collaboratively with the NSW Government to deliver strong outcomes for communities. Addressing the issues highlighted in this submission will be fundamental to achieving the Plan's objectives — accelerating housing delivery without compromising quality, while ensuring infrastructure and services keep pace with growth.

We support a regional, evidence-based approach that integrates land use, transport, infrastructure, environment, and liveability outcomes across the short, medium, and long term. This submission provides feedback on the draft Sydney Plan and associated documents currently on exhibition, covering:

- Section 3.1: Overarching feedback on the draft *Sydney Plan*
- Section 3.2: Detailed feedback on the Plan's recommendations and actions
- Section 4: Feedback on *A New Approach to Strategic Planning* (State Land Use Plan and framework)
- Section 5: Feedback on the Draft *State-wide Policy for Industrial Lands*

Below is a summary of key feedback and recommendations. It touches on core issues that councils consider critical, while more detail is provided in the body of the submission.

Key Feedback

- **Early and meaningful engagement with councils is essential**
  Limited consultation has reduced alignment with local strategies, delivery mechanisms, and investor confidence. Greater transparency is needed regarding the use of prior Region/District Plans and council Local Strategic Planning Statement (LSPS) inputs.
- **Strategic vision needs clarity and a long-term horizon**
  The Plan currently reads as a short-term reform rather than a 10–20-year metropolitan strategy. A coherent spatial strategy aligned with housing, transport, jobs, and infrastructure sequencing is required to provide certainty and avoid duplication.
- **Western Sydney must remain central to the metropolitan vision**
  Major centres, corridors, and growth areas in Western Sydney are inconsistently represented. Emphasis on the Sydney CBD and Bradfield City should not overshadow established and rapidly growing Western Sydney communities.

- **Support and resources are critical for councils**

  Councils are tasked with implementing much of the Plan but lack guaranteed funding, resourcing, or interagency delivery commitments. Social infrastructure gaps in Western Sydney must be addressed to maintain liveability and equitable growth.

- **Infrastructure and investment delivery requires whole-of-government coordination**

  Roles, funding, sequencing, and accountability across state agencies are unclear, risking delays in housing and services delivery.

- **Environmental resilience and hazard management need stronger integration**

  Bushfire, extreme heat, climate mitigation, biodiversity, and circular economy considerations require measurable actions and targets.

- **Industrial lands, urban services, and centres mapping need protection and clarity**

  Critical industrial land, waste, and resource recovery facilities must be safeguarded. Mapping inconsistencies undermine investment certainty and housing/job delivery.

- **Aboriginal outcomes require concrete actions and accountability**

  The Draft Plan lacks specific, measurable actions and mechanisms for Aboriginal communities, limiting implementation of reconciliation and inclusive growth goals.

Key Recommendations

- **Engagement & Governance**: Establish structured, ongoing council engagement and clarify the use of prior planning evidence.
- **Long-Term Spatial Strategy:** Publish a 5–10-year integrated spatial and infrastructure plan aligned with LSPS/Integrated Planning and Reporting (IP&R) cycles.
- **Western Sydney Focus:** Properly reflect centres, corridors, and projects, prioritise cross-regional connectivity and integrate existing strategic work.
- **Council Support:** Fund enabling works, LSPS/Local Environment Plan (LEP) alignment, and social infrastructure to match growth.
- **Whole-of-Government Delivery**: Publish infrastructure delivery schedules with agency responsibilities and timelines.
- **Environmental & Resilience Measures:** Implement an all-hazards approach with climate mitigation, biodiversity, and sustainable development targets.
- **Industrial Lands & Centres:** Clarify classifications, protect urban services, correct mapping, and ensure alignment with State policy.

- **Aboriginal Outcomes:** Co-design measurable actions with Aboriginal communities and embed accountability mechanisms across the Plan.

3. Feedback on the draft Sydney Plan

3.1 General feedback

This section outlines overarching feedback on the draft Sydney Plan, including its strategic positioning, intent, and key structural elements. It focuses on issues that are fundamental to the Plan's success, including ensuring the long-term vision is clear, accountability mechanisms are effective, broader metropolitan context is considered, and the Plan's objectives are deliverable in practice. Addressing these matters is critical to provide a strong foundation for implementation.

3.1.1 Improve consultation & engagement

WSROC expresses disappointment at the lack of early and meaningful engagement with local government in the lead up to the development of the draft Plan. We note this is a missed opportunity to ensure the draft Plan is embedded within the realities of the planning hierarchy and delivery mechanisms.

Alongside the NSW Government, Local Government is the key delivery partner for the Plan. As such, early collaboration would have made the Plan more robust and fit for purpose. Late engagement reduces the ability to align local strategies and infrastructure planning, increasing delivery risks and undermining confidence.

We further note that the rationale for changes from previous Region/District plans and council LSPS inputs is unclear. We are concerned that the new Sydney Plan lacks the grounding in existing strategic planning evidence and strategies.

We seek a genuine, ongoing, structured engagement framework.

Recommendations

- Establish a governance process that includes a structured engagement process with councils for iterative plan refinement and implementation coordination as well as monitoring approach.
- Publish how prior Region/District Plan evidence and LSPS inputs are being used or superseded.

3.1.2 Strategic vision & time horizon

While we acknowledge the need for periodic review and refinement in response to changing conditions, the described intent of the draft Sydney Plan and its structure are at odds with one another.

Currently, the Plan reads as a short-term (five-year) reform update rather than a 20-year metropolitan strategy anchored by a State Land Use Plan. The proposed shift to a land-use-only framework departs from the integrated land use, transport and infrastructure planning approach embedded in previous Region and

District Plans. A metropolitan strategy should shape major infrastructure and growth decisions, not simply consolidate or respond to decisions already made.

In addition, there is insufficient justification for the change from previous Region/District plans and limited linkage to existing LSPS evidence, or alignment with LSPS and IP&R cycles. The draft Plan largely captures existing land use settings and committed precincts, with limited identification of future strategic investigation areas or guiding metrics for change.

Without a coherent 20-year spatial strategy that embeds housing within transport, jobs and infrastructure sequencing, it risks weakening certainty for communities, councils and investors. The reliance on frequently updated technical appendices also risks incremental and siloed amendments without full consideration of metropolitan-wide implications. Ensuring the Plan is embedded within existing policies and review cycles will be critical to avoid duplication of effort and potential policy reversal at the next review.

Recommendations

- Publish a 20-year integrated spatial strategy for Sydney, with an accompanying integrated infrastructure sequencing plan and short-term action program.
- Explain how Region/District plan evidence and council LSPS work are being used, superseded or updated.
- Align regional priorities with council LSPS/IP&R cycles to support continuous delivery.

3.1.3 Re-centre Western Sydney in the metropolitan vision

Western Sydney must remain integral to the metropolitan vision. A genuinely polycentric city — with multiple strong, connected centres — is essential to delivering equitable access to jobs, services and opportunity across Greater Sydney.

Western Sydney plays a critical city-shaping role with major infrastructure, industrial lands, essential services and diverse communities. However, in the draft Plan, major centres, corridors and projects in Western Sydney are not consistently mapped or prioritised. This includes notable omissions and incomplete representation of key areas such as the Blue Mountains, Camden, and the Nepean River catchment, among others. The current plan also understates Western Sydney's contribution to Greater Sydney's economic performance, strategic land supply and critical city-serving functions, and essential services (e.g., water treatment, logistics, data centres).

A metropolitan plan for Sydney should clearly and comprehensively represent all areas within its scope. The absence or under-representation of significant parts of outer Western Sydney risks signalling — even

if unintentionally — that these communities are peripheral to the metropolitan vision. This undermines confidence in the Plan and weakens the message of equitable growth across the region.

The inconsistent mapping and prioritisation of Western Sydney centres and infrastructure, including key transport links, also risks reinforcing a CBD-centric transport and investment bias if cross-regional connectivity is not explicitly prioritised.

While we acknowledge and support the need to ensure Bradfield City and surrounds are well planned and sequenced, it is critical that this focus does not divert attention or investment from established centres and existing growth areas across Western Sydney. These communities are already experiencing substantial infrastructure backlog and major job access inequalities.

Significant strategic planning work has already been undertaken by the state government and councils to strengthen centres, coordinate land use and infrastructure, and support employment growth across Western Sydney. The current draft Plan appears to dilute this focus, which risks undermining investor certainty, delaying delivery, and weakening outcomes in areas where growth is already occurring.

Recommendations:

- Ensure strategic centres, corridors and projects in Western Sydney are properly reflected to avoid reinforcing east-weighted access and investment patterns.
- Embed cross-regional connectivity as a core principle, including strong east–west and north–south transport links, to complement radial connections to the CBD.
- Work with councils to integrate existing strategic planning work undertaken by councils and the state, ensuring alignment with housing, employment and infrastructure objectives to avoid duplication or missed opportunities.
- Strengthen recognition of Western Sydney's essential functions and opportunities.

3.1.4 Support Local Government to deliver

The daft Sydney Plan assigns a substantial share of implementation actions to local government and expects near term delivery aligned to the Plan's 20-year vision. While the Plan states it will "guide state and local strategic planning and assessments [and] infrastructure planning and prioritisation," many actions are framed for councils without outlining mechanisms for required resourcing or partner commitments.

Councils are asked to align LSPSs/LEPs and deliver new housing enabling infrastructure but lack guaranteed funding streams or interagency commitments to match growth; this increases the risk that approvals do

not translate to completions. We stress that without state-led, multiagency delivery programs and subsequent accountability, councils cannot reliably link local planning to the broader investment pipeline.

Recommendations

- Resource councils to implement by committing a targeted program to fund local enabling works, evidence updates and LSPS/LEP alignment, with clear eligibility criteria tied to the Sydney Plan's responses. Ensure any resource programs are co-developed with councils.
- Clarify how existing strategic work will be used or superseded and provide guidance for synchronising LSPS/IP&R cycles with the Plan, to prevent duplication and ensure continuity of evidence and investment signals.
- Provide required digital mapping and consistent data sets to support implementation. Work with Local Government to develop required tools and resourcing.

3.1.5 Whole of government integration and delivery of infrastructure

The draft Sydney Plan would benefit from a clearer articulation of how it operates as a genuine all-of-government strategy. The draft Plan does not sufficiently define interagency infrastructure roles, funding and timelines. In the exhibition materials, actions are identified for the Department and councils, yet actions for other state agencies are not specified, leaving gaps in responsibility for infrastructure, services, sequencing and accountability.

Approvals may not translate to implementation if enabling transport, open space, utilities and social infrastructure are not sequenced and funded.

Beyond clarifying roles, the Plan should more explicitly demonstrate how it aligns with, and is embedded within, existing state plans, infrastructure strategies and policy frameworks. At present, several relevant state strategies and plans are not referenced or clearly integrated. Without this alignment, there is a risk that strategic intent at the metropolitan scale is not consistently reflected in agency priorities, investment programs and implementation timelines.

Recommendations

- Publish a whole of government delivery schedule (5–10 years) that sequences infrastructure and services with housing and centres.
- Identify lead state agencies for each action (transport, utilities, schools/health, environment, resilience) and clarify shared responsibilities so councils are partners in delivery, not sole implementers.

- Clearly map the Plan's alignment with existing state plans, infrastructure strategies and policy settings, demonstrating how metropolitan priorities will be embedded within agency programs and funding allocations.

3.1.6 Address the social infrastructure gap

Local councils play a critical role in delivering the social infrastructure that underpins liveable communities — including community facilities, open space, libraries, cultural infrastructure and local recreation assets. However, councils do not have the financial capacity to fund the scale of social infrastructure required to support accelerated growth.

There is already a substantial and well-documented social infrastructure funding gap across Western Sydney due to its rapid growth, compounded by structural constraints on local government revenue. Councils are operating within rate-capping settings and increasingly restrictive developer contribution frameworks, limiting their capacity to fund the scale and timing of social infrastructure required to support accelerated housing delivery.

Without structural reform to infrastructure funding mechanisms and clearer alignment between growth commitments and funding pathways, this gap will continue to widen as housing delivery accelerates.

Expecting councils to bridge this shortfall through existing revenue sources is neither sustainable nor equitable. Without timely and coordinated investment in social infrastructure, we risk undermining community confidence, liveability outcomes and the long-term quality of growth. Delivering well-serviced communities requires a funding framework that matches the scale and pace of development.

Recommendation

- Work with councils to establish a coordinated metropolitan social infrastructure framework that provides councils with the mechanisms and resources needed to deliver growth-related social infrastructure, including upfront funding, reformed contributions settings, and a clear understanding of existing gaps and projected needs.

3.1.7 Clarify and improve centres mapping & typologies

The mapping and typology labelling of centres in the draft Plan is inconsistent and requires review. Smaller centres and rural towns are often omitted or under-recognised, and there are discrepancies across transport and open space layers. These issues appear to contradict the strategic directions established in the Greater Sydney Plan and district plans, and do not fully reflect the strategic planning work already

undertaken by councils. Such inconsistencies weaken investment signals for transport, social infrastructure, and private development, and may undermine the delivery of housing and jobs.

Recommendations

- Publish the methodology for centre classification (including thresholds, roles, and spatial extents) and link typology to assessment and funding programs, ensuring that investment aligns with strategy.
- Recognise locally and regionally significant centres.
- Work with councils to correct mapping discrepancies across centres, transport, and open space layers.
- Strengthen classification accuracy, protect regionally significant urban services and waste infrastructure, and establish transparent review processes to prevent encroachment and preserve capacity critical to housing and jobs delivery.

3.1.8 Environment & resilience

WSROC is concerned that the draft Sydney Plan does not sufficiently integrate environmental sustainability and resilience considerations. Critical hazards for Western Sydney — particularly bushfire and extreme heat — are under-weighted relative to flood, despite their significant impact on communities, infrastructure, and liveability. Addressing these hazards requires a comprehensive, all-hazards approach with measurable targets that reflect the region's risk profile and avoid long-term costs.

In addition to hazard management, the draft Plan is largely silent on climate mitigation and broader environmental resilience measures, including emissions reduction, blue–green infrastructure, water-sensitive urban design, biodiversity protection, and circular economy initiatives. Integrating these elements is essential to support net-zero pathways, protect liveability, and ensure infrastructure is resilient to future climate impacts.

Recommendations:

- Adopt an all-hazards approach to planning and risk management, with measurable indicators for bushfire, heat, flood, and other critical hazards.
- Integrate environmental resilience measures into the Plan, including firm actions on integrated water cycle management (IWCM), water quality, biodiversity protection, and circular economy practices, to support emissions reduction and sustainable development.

3.1.9 Industrial lands & urban services (incl. waste)

The draft Plan lacks clarity around industrial land categorisation and the protection of critical urban services, including waste and resource recovery facilities. Inaccurate or under-protected industrial land can compromise the delivery of housing, limit local employment opportunities, and disrupt essential city-shaping logistics and supply chains. Without clear guidance and protection, there is a risk that valuable industrial and service lands may be encroached upon or redeveloped in ways that undermine long-term metropolitan functionality.

Recommendations:

- Publish the evidence base underpinning industrial land classifications, with transparent review and update processes.
- Recognise and protect regionally significant urban services, including waste and resource recovery facilities, and ensure mapping aligns with the Statewide Industrial Lands Policy to safeguard land needed for employment, logistics, and essential services.
- Fund council evidence updates to reflect local employment priorities and urban service needs and clarify roles for planning regionally significant employment sites.

3.1.10 Aboriginal outcomes

WSROC is concerned that the Sydney Plan's number one priority, Aboriginal Outcomes, has no dedicated actions, mechanisms and implementation detail needed to meaningfully deliver on its intent. While the Discussion Paper signals that Aboriginal outcomes should be embedded across the other six priority areas, the draft Plan provides minimal detail on how this will be achieved. The absence of specific actions, measurable targets, or accountability mechanisms makes it difficult to see how the Plan will translate commitments into tangible outcomes for Aboriginal communities.

The draft Plan also does not reference the *Caring for Country: Aboriginal Outcomes Strategy 2024–2033* developed under the Cumberland Conservation Plan, nor clarify how this strategy will inform or align with the broader Sydney Plan. This omission raises questions about the role of cultural mapping, how it will be undertaken, and whether it will appropriately involve Traditional Knowledge Holders, Local Aboriginal Land Councils (LALCs) and other Aboriginal-led organisations. WSROC notes that some Elders are reluctant to share cultural knowledge or site locations with government agencies. Without a culturally safe and clearly articulated process, the Plan risks failing to secure the trust and participation of Aboriginal communities.

Further, current governance arrangements present challenges. The implied reliance on Local Aboriginal Land Councils (LALCs) is insufficient to ensure inclusive and representative engagement across Traditional

Owner groups. In some areas, Traditional Owners are not formally recognised within land council structures, meaning some groups may be excluded from participating in, or benefit from, the Plan's outcomes.

Likewise, the reference to "Prescribed Aboriginal Bodies" is vague and undefined—leaving unclear whether this refers to LALCs, Aboriginal corporations, native title bodies, or other forms of community governance. This lack of clarity suggests that adequate consultation with Aboriginal-led organisations, LALCs or community representatives has not occurred. Co-design with Elders and Aboriginal organisations requires meaningful time and process, neither of which are evident in the current draft.

Without clear guidance and implementation pathways, there is a significant risk that the aspirations for Aboriginal outcomes will not be realised. This could perpetuate inequities in access to housing, employment, services, and cultural recognition, and undermine opportunities to embed Aboriginal knowledge, culture, and heritage into planning, infrastructure delivery, and urban development. It also weakens the Plan's credibility in demonstrating a genuine commitment to reconciliation and inclusive growth.

Recommendations:

- Co-design explicit and measurable actions and targets with Aboriginal communities and organisations and embed them across the Plan's priorities.
- Embed accountability mechanisms to ensure implementation, monitoring, and reporting of progress.
- Integrate Aboriginal knowledge, culture, and heritage into planning, design, and infrastructure delivery, including recognition in urban renewal, housing, and open space strategies.
- Recognise all Aboriginal groups (Traditional Owners, LALCs, service providers, ACH/ACCOs, advisors) and collaborate with Aboriginal communities and organisations to co-design and oversee initiatives, ensuring the Plan reflects community priorities and builds lasting capacity.

3.2 Feedback on the Plan's responses and actions

This section provides targeted feedback on the Draft Sydney Plan's recommendations and actions. Getting this right is essential, it will determine whether the Plan's vision can be effectively delivered. Our feedback highlights gaps, opportunities, and refinements needed to ensure initiatives are implementable, coordinated, and deliver meaningful outcomes for communities.

3.2.1 Priority: Connected.

The Sydney Plan notes that councils need to plan for localised urban freight functions such as waste management when considering access and managing locally significant industrial lands (page 33). It should also reference this need in relation to housing or other urban environments, not just industrial accessibility for these critical services.

The Sydney Plan also remarks that land use planning can support the built environment alongside council-level sustainability controls and plans (page 36). In the current form, councils' plans and controls are not adequately considered in the current planning system and alone will not enable the sustainable development aims sought. If relying on council-level controls, greater support in the planning system should be made available to support and enforce such controls.

Recommendations:

- Explicitly integrate urban freight (including for waste management) and servicing requirements into housing and mixed-use planning provisions.
- Embed and reinforce council sustainability controls within the metropolitan planning framework to ensure consistent and enforceable delivery.

3.2.2 Response 1: Implement housing targets

Many Western Sydney councils are well underway in delivering their targets. However, the current ambitious housing targets are assigned without mechanisms to address the approvals-to-commencements gap or to guarantee enabling infrastructure and services.

Under the current model, councils are expected to deliver outcomes they cannot control. For example, councils have limited influence over market delivery outcomes. In addition, to support housing delivery, clarity on infrastructure sequencing and agency responsibilities, is needed. Without clear alignment between approvals, infrastructure delivery and market feasibility, there is a risk that approvals will not translate into commencements or completions, undermining confidence in target delivery.

In addition, we express concern that continued pressure to accelerate development assessment may also weaken quality, sustainability and servicing outcomes.

Recommendations:

- Monitor approvals vs commencements (and completions), include diverse typologies (e.g., student/co-living) in monitoring.
- Ensure target controls are feasibility-calibrated, taking into account areas where councils have no, or limited, control, including: infrastructure sequencing, agency commitments and market delivery
- Implement mechanisms that safeguard that timely DA expectations do not erode baseline quality, sustainability or waste servicing standards.

3.2.3 Response 2: Increase housing diversity and choice

WSROC cautions that current housing diversity settings are not sufficiently embedded within broader land use, transport and employment strategies, and may conflict with existing council centre and character planning. Uncoordinated flexibility risks poor liveability outcomes, community resistance, and erosion of local character without delivering meaningful housing diversity.

Recommendations:

- Embed housing diversity within an inclusive growth framework linked to transport, jobs and services.
- Establish clear guardrails, so flexibility (e.g. Apartment Design Guide) does not erode minimum liveability, sustainability and waste outcomes.
- Reconcile Plan mapping and typologies with existing council strategies for centres and character areas.

3.2.4 Response 3: Secure affordable housing supply

The Sydney Plan notes that Western Sydney's established greenfield precincts and emerging centres will continue to develop as new infrastructure comes online, and that sequencing and coordinated delivery of housing will be enhanced through improved monitoring and infrastructure planning (page 23).

The Plan also notes the aim to provide Sydney residents with access to affordable homes, and talks through a range of contributors to affordable housing. However, the Plan does not refer to housing that is affordable for occupants of the building, through infrastructure and services. It is critical to ensure any strategy that addresses the provision of housing for residents in Sydney also sets the strategic priority for

that housing to be developed in a manner so that the ongoing operation of the house does not disadvantage residents by locking them into poor energy efficiency or more expensive waste and recycling services.

The Plan lacks clear delivery pathways and timing certainty for affordable housing mechanisms. Without transparency and implementation tools, affordable housing supply is unlikely to keep pace with growth, worsening affordability pressures and inequity.

Recommendations:

- Publish a pipeline of surplus state land for affordable housing delivery.
- Test allocation of Housing Productivity Contribution (HPC) to affordable supply.
- Require affordable housing delivered through the planning process to be in perpetuity including in state-led rezonings.
- Ensure affordability encapsulates the need for housing to be affordable for occupants of the building, through infrastructure and services.
- Ensure the proposed tools and feasibility settings are realistic and deliverable.

3.2.5 Response 4: Grow well located jobs

The Plan does not clearly articulate how employment growth will be supported across established centres and industrial areas, particularly in Western Sydney. A lack of focus on cross-regional connectivity risks reinforcing CBD-centric investment patterns, limiting access to local jobs and increasing travel demand.

Recommendations

- Update industrial and employment lands strategy and classifications to reflect current economic roles.
- Fund local evidence updates to reflect regional employment priorities.
- Protect urban services and logistics lands essential to metropolitan functioning.
- Prioritise transport investments that strengthen cross-regional connectivity and Western Sydney job access.

3.2.6 Response 5: Align infrastructure to planned growth

Infrastructure sequencing, funding responsibilities and delivery roles remain unclear in the Plan. We are particularly concerned that key projects are shown as aspirational, including T-ways, metro extensions and rail upgrades.

Misalignment between growth and infrastructure risks infrastructure deficits, delayed housing delivery, and reduced investor confidence.

WSROC supports the identification of waste facilities as regional and local-scale infrastructure requiring protection from encroachment and landuse conflict, as well as the identification of new sites to meet future capacity needs (page 53). Given the regional nature of waste and resource recovery facilities and the concern of councils for shortfalls in required infrastructure, the delivery of this Plan must ensure the infrastructure delivery programs identified can contribute to the delivery of desperately needed waste infrastructure facilities to address the current waste challenges. At present, waste infrastructure is not addressed within the Urban Development Program. It is difficult for councils to flag this concern through the UDP process, despite holding significant concerns about accessibility and capacity constraints of waste infrastructure, because councils do not have the complete data on facility lifespan and remaining service capacity as it is delivered by the private sector. As councils experience difficulty accessing to disposal infrastructure to service additional dwellings , a sub regional or Sydney wide approach must be taken to plan for and deliver waste infrastructure needed to service additional residential development.

Recommendations

- Finalise an integrated infrastructure and contributions framework with clear roles, funding and timelines.
- Publish interagency sequencing aligned with rezonings and centres, and include LSPS/IP&R alignment guidance.
- Ensure waste infrastructure is included in the remit of the UDP to address sequencing of this essential infrastructure.
- Inclusion of NSW EPA in the UDP to ensure development is not constrained by identified waste disposal capacity shortfalls.
- Clarify the status of unfunded projects and their representation in Plan maps (T-Ways, Metro extensions, rail upgrades).

3.2.7 Response 6: Create a more vibrant Sydney

The Plan places limited emphasis on supporting vibrancy outcomes in growth areas outside major entertainment precincts. We stress that without targeted investment, new communities may lack identity, activation and social cohesion, weakening long-term liveability.

Recommendations

- Provide state-led tools and funding to support place-based vibrancy in growth LGAs
- Support delivery of active frontages and local centres as everyday destinations.

3.2.8 Response 7: Grow and connect public open space

Open space definitions and modelling appear inconsistent with council evidence. The Plan seems to overstate available recreational land in several LGAs, in part due to National Parks being conflated with local usable open space. This needs correction because inaccurate assessments risk under-provision of usable public open space, particularly in high-growth areas.

Recommendations

- Establish enforceable open-space benchmarks that distinguish usable public open space from conservation land. Ensure benchmarks are tailored to density/context and aligned with council corridor strategies (e.g. Nepean River).
- Correct mapping where non-local open space is being counted as local provision

3.2.9 Response 8: Secure a pipeline of productive industrial lands

Industrial land categorisation and protection of urban services, including waste and resource recovery, remain unclear or are inaccurate. In addition, clarification is needed for responsibilities for regionally significant sites. Loss or encroachment of industrial lands threatens housing delivery, employment capacity, and essential metropolitan logistics.

A map of industrial land in Sydney (page 31 & page 59) does not appear to include a number of Sydney's regionally significant waste and resource recovery sites. Other state government industrial land policies, including the draft Statewide Policy for Industrial Lands, specifically recognise waste infrastructure as critical regional infrastructure.

In the mapping showing proposed sites, it is evident that land hosting some of the Sydney's most critical remaining waste infrastructure is not captured under this classification, despite the policy specifically calling it out. For example, Lucas Heights Landfill, the last remaining large and openly accessible putrescible landfill in Sydney, is not captured despite being acknowledged as such by the NSW Government. While landfills, large and small (see also Hawkesbury Landfill) have zoning that may deem them an alternate 'protection', failing to capture them under the industrial lands policy, and by extension recognised within the Sydney Plan, fails to afford them the additional strategic protects detailed within this suite of plans.

Recommendations:

- Publish the evidence base underpinning classifications with transparent review processes.
- Protect waste/resource recovery assets (including landfills) as regionally significant urban services; and align mapping with the State-wide Industrial Lands Policy.
- Clarify responsibilities for safeguarding strategic sites.

3.2.10 Response 9: Minimise natural hazards

The Draft Sydney Plan appears to lean on the State Disaster Mitigation Plan (SDMP) and the rollout of Disaster Adaptation Plans (DAPs) to address natural hazards. In practice, only one DAP is currently being progressed within metropolitan Sydney, the Hawkesbury–Nepean Valley DAP, and it is flood-focused rather than multi-hazard focused. There is no published schedule or funding commitment for additional Sydney metropolitan DAPs, creating a significant near-term gap for other critical hazards (notably extreme heat and bushfire) across Greater Sydney.

A genuine all-hazards approach is required—one that gives practical effect to heat, bushfire and catchment-scale flood risk (beyond the Hawkesbury–Nepean) and embeds resilience in approvals, infrastructure sequencing and place-based design. It is also important that flood and evacuation modelling is handled at the strategic plan stage, not Development Application (DA) stage. Failure to do so increases long-term risks to communities, infrastructure and liveability, particularly in vulnerable regions.

In addition, the Plan is also largely silent on climate mitigation measures such as emissions reduction, circular economy, Integrated Water Cycle Management (IWCM) and biodiversity protection. Failure to embed specific actions in the Plan will increase community risk and long-term costs, risks not achieving NSW's net-zero targets and decreased infrastructure resilience.

Recommendations

- Adopt an all-hazards approach with measurable indicators for heat, bushfire and flood, and explicitly require these to be addressed in regional and local planning instruments and major precinct approvals.
- Do not rely on future DAPs alone to cover the metropolitan hazard gap: confirm short-term, Sydney-wide actions for extreme heat and bushfire now (e.g., design controls, development assessment guidance, and funding for priority resilience works), noting that the only current metro DAP (Hawkesbury–Nepean) is flood-specific.

- Embed heat resilient urban design requirements (shade/canopy, cool materials, water-sensitive design, greening, deep soil and thermal comfort benchmarks) and support councils with place-based risk tools (e.g. Rating/assessment tools used in Greater Sydney heat programs. Refer to section 3.2.10.1 in this document for further notes on heat resilience).
- Apply catchment-scale planning beyond the Hawkesbury–Nepean Valley, including evacuation network analysis and funding pathways for upgrades in other high-risk catchments.
- Update hazard mapping and indicators to include key corridors (e.g., Nepean River and Narellan Creek), with region-specific metrics that reflect exposure, vulnerability and evacuation performance.
- Strengthen climate mitigation and environmental resilience actions: set firm measures on emissions reduction, IWCM/WSUD, waterway health, biodiversity, and circular economy to reduce risk drivers and support net-zero pathways.

3.2.10.1 Additional commentary on heat

We are particularly disappointed that extreme heat is not adequately addressed as a core planning issue in the draft Plan. This is a significant gap given that heatwaves are widely recognised as Australia's most deadly natural hazard, with major impacts on health, infrastructure, productivity and liveability.

The recently released Cooler Places guidance by the NSW planning department is welcomed and demonstrates growing awareness of urban heat impacts. However, guidance alone is insufficient to drive consistent, measurable outcomes across rapidly growing areas. Without clear policy settings, statutory mechanisms, and accountability, implementation will remain uneven and dependent on individual councils or proponents rather than being embedded as a system-wide requirement.

This issue is particularly critical for Western Sydney, where urban heat exposure is among the highest in metropolitan Sydney and where significant new growth is planned.

Councils across Sydney have taken substantial action to address urban heat through strategic planning, research and practical tools. Existing resources — including the Urban Heat Planning Toolkit and the Cool Suburbs assessment tool — could be scaled up and embedded at a state level.

The need to embed heat resilience in the planning system was a key recommendation in the Greater Sydney Heat Smart Sydney Plan, which was developed with the Australian and NSW Government agencies, industry, community and academic sector. We strongly urge the Government to implement the recommendations outlined in the paper Heat and the planning system: A case for change in NSW. This

paper was developed in consultation with NSW councils and the Greater Sydney Heat Taskforce and identifies required changes to the NSW planning system to address heat, including:

- Develop heat risk mapping overlays to inform strategic planning and application of controls, using up to date applicable climate data / climate zones
- Work with relevant stakeholders to identify required updates to: Sustainable Buildings SEPP, Codes SEPP, Precincts SEPPs, Standard Instrument LEP, local LEPs and DCPs
- Provide guidance and support to improve clarity, consistency and justification for changes. Including planning circulars, case studies, background information, urban heat and vulnerability mapping, as well as strengthening compliance support

If heat resilience is not formalised within the planning system, the metropolitan area risks locking in future development patterns that increase heat exposure and transfer long-term costs onto communities. These costs include poorer health outcomes, higher energy demand, declining outdoor amenity, reduced productivity, and increasing pressure on public infrastructure, health and emergency systems.

Failing to integrate heat resilience now — particularly as significant housing growth is planned across Western Sydney — risks creating suburbs that are expensive and difficult to retrofit in the future. This represents a missed opportunity to design cooler, healthier and more resilient communities from the outset.

Recommendations

- Embed heat resilience as a core requirement within the planning framework, not solely as guidance, but by introducing clear policy settings, measurable outcomes and accountability mechanisms across strategic planning, precinct planning and development assessment. Refer to the body of work already existing for details and guidance[1,2,3].
- Adopt a whole-of-system approach to urban heat, integrating land use planning, transport, green and blue infrastructure, water-sensitive design, and built form controls to ensure cooling outcomes are delivered consistently across all scales of development.
- Leverage existing evidence and tools already developed by councils and partners, including the Urban Heat Planning Toolkit and Cool Suburbs assessment tool, by scaling these resources for statewide application and making them publicly available through state-led delivery programs.

[1] Heat Smart City Plan (2024)

[2] Heat in the Planning System: a case for change (2024)

[3] Urban Heat Planning Toolkit (2021)

- Prioritise heat resilience in high-growth regions such as Western Sydney, ensuring new development does not exacerbate existing heat vulnerability and that planning decisions reduce long-term risk and future retrofit costs.

3.2.11 Response 10: Sequence growth in greenfield areas

Enabling infrastructure must be clearly embedded in growth sequencing for greenfield areas. Delays in delivering essential infrastructure — including transport, waste, utilities and servicing networks — risk undermining housing supply targets and increasing long-term costs for both government and residents. Growth must not outpace the infrastructure required to support new communities.

Waste and resource recovery warrants particular attention. Waste disposal and processing sites have quite specific characteristics that preclude such sites from general utility or many industrial land types. They require appropriate sequencing to ensure delivery to market and accessibility for new communities, otherwise opportunity to deliver these will be lost and likely will never be delivered.

Recommendations

- Recognise waste and resource recovery facilities as essential enabling infrastructure.
- Bring forward sequencing reviews with regular annual updates.

3.2.12 Response 11: Manage land uses beyond the urban footprint

The relationship between the urban footprint, Metropolitan Rural Area (MRA) and associated policy implications remains unclear. Uncertainty may compromise protection of rural and conservation values and create inconsistencies in planning decisions.

Recommendations

- Clarify the purpose and evolution of the urban footprint vs MRA, and potential policy implications.
- Include rural town and village typologies in the Plan and protect rural/conservation values.
- Involve councils in mapping of critical infrastructure (including waste) outside urban areas.

3.2.13 Response 12: Protect and enhance the natural environment

The Plan lacks firm actions on water management, biodiversity, tree canopy and circular economy outcomes. Without clear commitments, environmental resilience and net-zero objectives may not be

achieved, increasing future costs and reducing liveability. We also note the need to link the Plan with existing strategies and plans, for example the Cumberland Plain Conservation Plan.

Recommendations

- Introduce firm actions on Integrated Water Cycle Management (IWCM), Water Sensitive Urban Design (WSUD) and water quality standards.
- Strengthen biodiversity and canopy targets, including within exempt and complying pathways.
- Embed circular economy practices and actions to reduce consumption of resources to support resource efficiency and emissions reduction.

4. Feedback on A New Approach to Strategic Planning (State Land Use Plan and framework)

WSROC supports the framework's intent to establish a clearer state-to-region hierarchy that aligns infrastructure, land use and delivery. If implemented with strong governance, transparent accountability and genuine recognition of regional diversity, the approach can improve sequencing, reduce duplication and provide clearer investment signals to councils and industry.

Councils also support closer synchronisation of regional priorities with LSPS and IP&R cycles, provided there is practical guidance on how prior Region/District plan evidence and current LSPS work are to be used, updated or superseded. This is essential to maintain continuity of evidence, avoid repeated re-work and keep programs deliverable within realistic resourcing windows.

Councils consistently raised that, 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, and risks short-termism unless paired with a 10–20-year spatial strategy and integrated infrastructure program. The framework must also clearly articulate how it aligns with recent amendments to the *Environmental Planning and Assessment Act 1979* and associated planning reforms, to avoid procedural uncertainty or policy conflict.

Clarification is required regarding how new assessment pathways, including targeted assessment development, will interact with the strategic framework. Where such pathways rely on consistency with strategic plans, those plans must contain sufficient spatial clarity and merit criteria to support robust decision-making. The interaction between the draft Sydney Plan and the Housing Delivery Authority also requires greater transparency to ensure that determinations of "strategic merit" are grounded in clear and consistent metropolitan objectives.

Councils also highlighted delivery risks: stretched consultant markets, unfunded expectations on local government to generate new evidence and precinct work, and the need for clear whole-of-government roles and resourcing to match the implementation burden. Addressing these issues up front will be critical to ensuring the framework accelerates outcomes rather than creating missed opportunities and wasted resources at the local level.

Lastly, while WSROC's primary focus is metropolitan Western Sydney, the broader framing of NSW within the Plan also warrants attention. Grouping most of NSW into a single "rest of state" category risks masking distinct regional economies, infrastructure needs and settlement patterns that require differentiated

planning responses. A more nuanced approach would strengthen the overall strategic coherence of the Plan.

Recommendations

- Provide a State Land Use Plan to anchor regional planning; the absence creates uncertainty for LSPS updates and housing capacity decisions.
- Clarify the interaction between the strategic framework, targeted assessment pathways and the Housing Delivery Authority.
- Avoid grouping most of NSW into a single "rest-of-state" plan, this masks regional diversity and distinct economic contexts.
- Strengthen council capacity to prepare integrated place-based plans, acknowledge stretched consultant markets and provide funding/timeframes that match the task.

5. Feedback on the Draft State-wide Policy for Industrial Lands

WSROC supports the policy's intent to establish a consistent, evidence-based framework for planning and protecting industrial/employment lands across NSW. This includes the proposed statewide categorisation of land as state, regionally or locally significant and the focus on safeguarding urban services that underpin housing delivery, logistics and the clean energy transition-based framework for planning and protecting industrial/employment lands across the NSW energy transition.

This approach, coupled with a coordinated Employment Land Development Program and supply pipeline, has the potential to improve certainty, support intensification where appropriate, and better align infrastructure investment with economic activity — particularly in Western Sydney's polycentric structure. WSROC also welcomes the integration of the industrial lands categorisation into the draft Sydney Plan so that strategic employment areas and essential urban services are reflected consistently at the metropolitan scale.

We note the need to develop clearer classification evidence and transparent review processes to ensure categories accurately reflect on-the-ground economic roles and allow recognition of locally significant precincts.

We stress that mapping must reliably capture regionally significant waste and resource recovery infrastructure and other urban services to prevent encroachment and avoid undermining supply chains critical to housing and jobs. While Sydney landfills, large and small, have zoning that may deem them an alternate 'protection', failing to capture them under the industrial lands policy, and by extension recognised within the Sydney Plan, fails to afford them all the additional strategic protections detailed within this Industrial Lands Plan. Mapping must reliably capture regionally significant waste and resource-recovery infrastructure and other urban services to prevent encroachment and avoid undermining supply chains critical to housing and jobs.

Given documented industrial land shortfalls, low vacancies and rising costs, the policy should also clarify responsibilities for planning and safeguarding regionally significant sites, and fund council evidence updates so local priorities can be incorporated without delay.

Recommendations

- Clarify classification evidence and publish transparent review processes
- Allow the strategic merit of locally significant classifications to be recognised.
- Ensure mapping captures all regionally significant waste/resource recovery infrastructure (including landfills) and aligns with the policy's categories so capacity is protected and can grow.

6. Contact

WSROC and our member councils recognise the importance of the draft Sydney Plan in guiding the city's growth. We are committed to working with the NSW Government to ensure Sydney's strategic planning is effective, evidence-based, and delivers for communities across the region.

We encourage the Department to collaborate with councils and Regional Organisations of Councils (ROCs) to inform the ongoing development and implementation of the Sydney Plan.

Through genuine, ongoing engagement, we can ensure the Plan is informed by local knowledge, evidence, and delivery experience. This will facilitate alignment of housing, infrastructure, transport, social services, and environmental outcomes, ensuring that Greater Sydney remains a liveable, resilient, and equitable city for all its residents.

For Further information or to discuss matters raised in this submission please contact the WSROC office:

Western Sydney Regional Organisation of Councils
Suite 201, Level 2, 85 Flushcombe Road, Blacktown
PO Box 63, Blacktown NSW 2148
Phone: 02 9671 4333
Email: info@wsroc.com.au
Web: wsroc.com.au