



**ORDINARY MEETING OF COUNCIL
TO BE HELD ON TUESDAY, 17 FEBRUARY 2026 AT 7:00 PM
LEVEL 3, COUNCIL CHAMBER**

LATE AGENDA

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NOTE: For Full Details, See Council's Website –
www.kmc.nsw.gov.au under the link to business papers

MM.4 Recognising the achievements of local Winter Olympians 4

File: CY00455/14

Through this Mayoral Minute I would like to recognise the achievements of some local Winter Olympians who will be competing in the 2026 Winter Olympics at Milano Cortina in Italy.

Kyra Wheatley, the daughter of Councillor Kim Wheatley, will represent Australia in ski cross in Livigno at the 2026 Olympic Winter Games.

Kyra got her first taste of the Games environment when she competed at the Winter Youth Olympic Games in 2020.

Born and raised on the North Shore, Kyra is a long-time member of the Perisher Winter Sports Club. She thrived on the camaraderie of Australian winters and the wider snow sports community overseas.

As a junior, she was a versatile skiing talent before narrowing her focus to ski cross. That decision quickly translated to the U16 Australian Alpine title and the New Zealand U16 Youth Series crown in 2018, followed by Australian U18 Giant Slalom and Slalom titles in 2019.

Her form was strong enough to earn selection for the World Cup Championships in Engadin–St Moritz in 2025, but a shoulder and knee injury ended her season.

Despite this setback Kyra was named Snow Australia's Female Ski Cross Athlete of the Year for 2025, with her World Cup debut and consistent European Cup form singled out by selectors in their decision to include her in the Olympic squad.

I also commend two other Ku-ring-gai based Winter Olympians competing this year.

Danielle Scott, also a former Pymble Ladies College alumni along with Kyra, will be competing in the Freestyle Skiing (Aerials) category. This will be Danielle's fourth Olympic Games.

Rosie Fordham a former Abbotsleigh student has been selected for the Cross Country Skiing team following a record-breaking 2025 season.

On behalf of the Ku-ring-gai community and Council, we wish these young athletes and the Australian team every success at the Winter Olympics.

Recommendation:

That this Mayoral Minute be received and noted

MM.5 Council Partnership to Support Jewish Community Mental Health and Wellbeing

6

File: S04921

I wish to inform Council of a proposed collaborative initiative between Ku-ring-gai Council and Sydney North Health Network (Northern Sydney PHN) to co-host a community roundtable aimed at supporting the mental health and wellbeing of the local Jewish community. As the Ku-ring-gai Local Government Area is home to the largest Jewish population within the northern Sydney region, this partnership provides an important opportunity to work proactively with community leaders and service providers to better understand local needs, strengthen coordinated responses, and ensure initiatives are culturally responsive.

Following a meeting held on 28 January 2026 with a representative from Sydney North Health Network, we discussed the value of adopting a coordinated, community-informed approach to mental health and wellbeing. This initiative reflects Council's ongoing commitment to fostering an inclusive, connected, and resilient community while working in partnership with key stakeholders.

The proposed roundtable will bring together Jewish community leaders, representatives from faith-based and multicultural organisations, service-based agencies, and the Police Area Command to facilitate meaningful dialogue on the mental health and wellbeing priorities of the Jewish community. The session is intended to promote a collaborative, community-led approach to identifying needs, sharing insights, and strengthening partnerships that directly support the Jewish community while also informing broader regional planning. By creating a forum for open engagement, Council and the PHN aim to ensure that initiatives are grounded in lived experience and responsive to the unique challenges faced by the Jewish community in northern Sydney.

This consultation will also help inform how funding provided through the PHN is directed. The funding available totals \$114,000 for the 2026 financial year and \$233,472 for 2027, and

insights gathered through the roundtable will guide its allocation to achieve the greatest benefit for the Jewish community while reinforcing a coordinated regional approach to wellbeing.

Council and Sydney North Health Network propose to convene the roundtable in early March, allowing sufficient lead time to support strong participation. I have agreed to co-chair the discussion in recognition of Council's commitment to collaborative leadership. Council will assist in identifying appropriate stakeholders and confirming logistical arrangements, while the PHN will distribute invitations and coordinate attendance, with follow-up undertaken jointly as required.

This initiative provides Council with an opportunity to work closely with health partners and community leaders to better understand local needs, strengthen trusted relationships, and support a proactive, unified, and culturally responsive approach to mental health and wellbeing.

Recommendation:

That Council endorse the Mayor to co-chair a community mental health and wellbeing roundtable with Sydney North Health Network (Northern Sydney PHN) to directly support the Jewish community and guide the allocation of PHN funding through a coordinated, community-led approach

GB.17 **Exhibition of NSW Government's Strategic Planning Documents -
Draft Submissions**

8

File: S15180

To provide three draft submissions for Council's potential endorsement, in order that they can be forwarded to the NSW Government by 27 February 2026.

Recommendation:

That Council resolve to endorse the three submissions included as **Attachments A1 to A3** and forward them to the NSW Government.

MAYORAL MINUTE

RECOGNISING THE ACHIEVEMENTS OF LOCAL WINTER OLYMPIANS

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RECOMMENDATION:

That this Mayoral Minute be received and noted

Item MM.4

CY00455/14

Councillor Christine Kay
Mayor

MAYORAL MINUTE

COUNCIL PARTNERSHIP TO SUPPORT JEWISH COMMUNITY MENTAL HEALTH AND WELLBEING

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Councillor Christine Kay
Mayor

EXHIBITION OF NSW GOVERNMENT'S STRATEGIC PLANNING DOCUMENTS - DRAFT SUBMISSIONS

EXECUTIVE SUMMARY

PURPOSE OF REPORT:

To provide three draft submissions for Council's potential endorsement, in order that they can be forwarded to the NSW Government by 27 February 2026.

BACKGROUND:

The NSW Government has requested submissions in response to its exhibition of three Strategic Planning documents:

- A New Approach to Strategic Planning – Discussion paper
- The draft Sydney Plan
- A Statewide Policy for Industrial Lands

The public exhibition period is open until Friday, 27 February 2026, with submissions invited from industry, government and the public via the online consultation portal prepared by the Department of Planning, Housing, and Infrastructure.

COMMENTS:

The opportunity to provide feedback on the NSW Government's strategic planning direction is welcomed. This report responds with three draft submissions.

RECOMMENDATION:

(Refer to the full Recommendation at the end of this report)

That Council resolve to endorse the three submissions included as **Attachments A1 to A3** and forward them to the NSW Government.

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COMMENTS

The opportunity to comment on the NSW Government's strategic planning direction is welcomed. However, the limited timeframe provided for councils to prepare submissions, combined with the absence of robust, evidence-based analysis and lack of strategic vision in the Discussion Paper and the draft Sydney Plan, is concerning. The documents demonstrate a clear 'housing-first' bias, with insufficient mechanisms to provide housing growth while still ensuring environmental protection, infrastructure delivery, and climate resilience.

An immediate pause in the process is recommended until the foundational elements of these documents are reviewed. In particular, the Sydney Plan should be strengthened through the inclusion of evidence-based data, clear environmental protection metrics, and broader policy reforms to support a more balanced and integrated planning framework.

The Statewide Policy for Industrial Lands introduces three categories intended to improve the management and protection of industrial land. This initiative is supported, noting that NSW's industrial land supply—particularly in Sydney—has been steadily eroded by encroachment from competing and incompatible land uses.

Council staff have reviewed the draft submission prepared by the Northern Sydney Regional Organisation of Councils (NSROC) in response to the subject documents. Overall, the recommendations contained in the attached submissions align with NSROC's position.

The key high-level recommendations included in the submissions are provided below. Within the submission on the draft Sydney Plan there are further detailed recommendations addressing the proposed planning responses and action items outlined in the draft Plan.

Key Recommendations:**A New Approach to Strategic Planning – discussion paper (Attachment A1)**

1. **Immediate Pause:** Halt the finalisation of the framework until the Statewide Land Use Plan and Local Strategic Planning Statement (LSPS) guidelines are exhibited. The discussion paper hints at a more modular or standardised LSPS, which Council will not support. There must be provision for the unique identity of LGAs to be expressed in their LSPS.
2. **District Plans:** Reinstate District Plans, which provide a vital middle ground for sub-regional collaboration. Without them, there is a "strategic vacuum" between high-level regional goals and local implementation.
3. **Hierarchy of Planning Priorities:** A clear conflict resolution mechanism is required to ensure qualitative priorities (Resilience/Liveability) are not automatically traded away for quantitative ones (housing targets).
4. **Binding Infrastructure Commitments:** Shift from "coordinated" planning to funded and scheduled delivery, ensuring infrastructure is active *before* or *concurrent* with population growth.
5. **Strategic Autonomy:** Redefine the role of Local Government from "compliance agents" to strategic partners whose local constraints (heritage, biodiversity) inform state targets.

The draft Sydney Plan (Attachment A2)

1. **National Housing Accord (NHA): Housing Targets & Market Realities:** Housing targets must be supported by broader policy reforms to ensure that "increased supply" results in measurable improvements to housing affordability.
2. **Infrastructure Capacity and Funding Equity:** The Department must publish the baseline infrastructure capacity modelling used to justify the 'high growth capacity' designation for infill LGAs. Additionally, Council requires formal guarantees that Housing Productivity Contributions collected within TOD and LMR precincts are ring-fenced for infrastructure delivery within those same precincts.
3. **Learnings from the 2018 Greater Sydney Region Plan (GSRP):** DPHI should provide an evidence-based review of the learnings from the 2018 GSRP and demonstrate their application within the draft Sydney Plan.
4. **Agency Integration:** The Department of Planning, Housing and Infrastructure (DPHI) must develop and publish an Integrated Infrastructure and Constraints Map that aligns housing targets with the specific delivery timelines of partner agencies (including Education, Health, Transport, Climate Change and the EPA). This cross-agency synthesis must be embedded within the final Sydney Plan to provide a transparent guarantee that rapid housing delivery will not compromise long-term urban resilience, serviceability, or environmental standards.
5. **Sequencing, Resourcing and Timing:** The draft Sydney Plan should be amended to clearly sequence council actions, so they align with the completion of the LSPS review and provide councils with realistic time frames to meet specified planning requirements. In addition,

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the State Government should identify appropriate resourcing, funding, and support mechanisms to enable councils to deliver the proposed actions.

6. **Heritage and Placemaking:** Reintroduce a formal definition of heritage and include policy objectives and metrics that prioritise the identification, conservation and enhancement of heritage assets as essential components of liveability.
7. **Environmental Stewardship:** Establish clear, legally binding metrics to protect biodiversity, riparian lands, coastal lands and waterways. These must go beyond simple canopy percentages to include:
 - Ecological Integrity: Protect existing environmentally sensitive habitats from fragmentation caused by new development.
 - Climate Neutral Growth: Require all new building growth to account for and mitigate its lifecycle greenhouse gas contributions.
 - Systemic Resilience: Recognize that protecting the natural environment is a primary strategy for climate mitigation, ensuring both generational equity and ecological sustainability.

Draft Statewide Policy for Industrial Lands (Attachment A3)

1. **Land Classification:** Strong support is provided for the classification of the Pymble Business Park (E3 – zoned land) as ‘Regionally Significant’ industrial land. Given Ku-ring-gai’s lack of a deep industrial land bank, the policy’s directive to not support residential uses on ‘Regionally Significant’ land is essential for maintaining the viability of this area.
2. **Climate change:** The NSW Government has committed to reach net zero GHG emissions by 2050, including a 50% emissions reduction on 2005 levels by 2030 so it is appropriate to include explicit Net Zero targets and climate resilience within the policy’s core objectives.
3. **Infrastructure Funding Gap:** Intensification of ‘Regionally Significant’ lands should not result in a net-cost transfer to local councils whose rate bases are already constrained by the rate peg. The intensification of Regionally Significant land (such as Pymble) will inevitably place a disproportionate burden on local road networks, intersections, and drainage systems. Therefore, where ‘Regionally Significant’ lands are to be intensified, the policy must specify the State funding mechanisms available to ensure the necessary upgrades to infrastructure.
4. **Expanded Application:** Extend the scope of *Technical Note 2 – Considering Alternate Land Uses* to include the E1 Local Centre zone, not just the E3 Productivity Support, E4 General Industrial and E5 Heavy Industrial zones. This will provide Council with a much-needed framework to assess applications for alternative land uses on increasing valuable urban services land.
5. **Additional Permitted Uses:** *Technical Note 2*, references expanding the use of the ‘Additional Permitted Use’ provisions to enable uses that ‘align’ with the objectives of the relevant industrial zone. Further details, including a strict definition of the word ‘align,’ must be provided for consultation before this change is adopted. Council cautions that this change may lead to a plethora of ‘quasi’ spot rezonings that lack strategic merit.

6. **Quantifiable, time-bound success metrics.** The policy lacks measurable metrics to assess its success. These are necessary to provide greater certainty to users and ensure alignment with Government commitments.
7. **Review Certainty:** A fixed 5-year review cycle is required, aligned with the Regional Plan review cycle.

INTEGRATED PLANNING AND REPORTING

Outcome 2: Sustainable urban growth and change

Community Strategic Plan Strategy	Delivery Program Term Achievement	Operational Plan Action
Our vision is for a thriving and connected community where we balance growth and change with the protection of our natural environment and heritage and work together to ensure a vibrant and inclusive future	Outcome 2: Sustainable urban growth and change Ku-ring-gai is a thriving community of safe and well-planned neighbourhoods. We are continuing to deliver diverse housing options, while balancing suburban growth with the preservation of our unique character, open spaces and heritage	U2 – Ensure land use strategies, plans and processes are in place to protect existing character and effectively manage growth and change

GOVERNANCE MATTERS

The NSW Government’s suite of strategic documents has been prepared to satisfy state planning requirements. Council’s role is advisory only through the submission process. Any future statutory changes arising from the Plan would be subject to separate processes, approvals and, where required, further Council consideration.

RISK IMPLICATION STATEMENT

This report is low risk in nature. It does not commit Council to any statutory or financial obligations and does not endorse the draft documents. The primary risk relates to ensuring Council is informed of the State’s strategic planning directions and responds with submissions within the exhibition timeframe.

FINANCIAL CONSIDERATIONS

There are no direct financial implications arising from this report. The preparation of submissions will be undertaken within existing staff resources.

SOCIAL CONSIDERATIONS

The draft documents address the State’s strategic vision for long-term housing, employment and liveability outcomes across NSW and within Sydney. Community members have the opportunity to provide direct input through the exhibition process by making individual submissions to the NSW Government.

ENVIRONMENTAL CONSIDERATIONS

The draft documents include high-level directions relating to environmental protection, biodiversity, climate resilience and the blue-green grid. This report does not assess environmental impacts or propose any changes to environmental controls.

COMMUNITY CONSULTATION

The NSW Government has placed the draft documents on public exhibition and is seeking submissions directly from councils, stakeholders and the community via its online consultation platform.

INTERNAL CONSULTATION

This report and the attached submissions have been prepared in consultation with relevant staff within the Strategy and Environment and Urban Planning teams, and with awareness of parallel work being undertaken through the Northern Sydney Regional Organisation of Councils (NSROC).

SUMMARY

This report includes Council's submissions prepared in response to the NSW Government's exhibition of its suite of strategic planning documents.

RECOMMENDATION:

That Council resolve to endorse the three submissions included as **Attachments A1 to A3** and forward them to the NSW Government.

Philippa Hayes
Strategic Planner Heritage

Craige Wyse
Team Leader Urban Planning

Antony Fabbro
Manager Urban & Heritage Planning

Andrew Watson
Director Strategy & Environment

Attachments:	A1 	New Approach to Strategic Planning Draft Submission	2026/040527
	A2 	Draft Sydney Plan Draft Submission	2026/040756
	A3 	State Wide Policy for Industrial Lands Draft Submission	2026/040735



Ku-ring-gai Council Submission

A New Approach to Strategic Planning Discussion Paper

Department of Planning Housing and Infrastructure
February 2026

Executive Summary

Ku-ring-gai Council welcomes the opportunity to comment on the *New Approach to Strategic Planning - Discussion Paper*. This submission has been prepared in conjunction with Council's review of the *Draft Sydney Plan*.

While Council supports the intent to simplify the NSW planning system, we hold significant concerns regarding the 'housing-first' bias of the proposed framework. The Discussion Paper presents a top-down model that undermines local leadership and fails to provide a robust mechanism to balance housing growth with infrastructure delivery and climate resilience. Without a clear conflict-resolution mechanism or a commitment to funding infrastructure, the proposed framework risks creating congested, high-density environments that are vulnerable to climate challenges.

Key Recommendations

1. **Immediate Pause:** Halt the finalisation of the framework until the Statewide Land Use Plan and Local Strategic Planning Statement (LSPS) guidelines are exhibited. The discussion paper hints at a more modular or standardised LSPS, which Council will not support. There must be provision for the unique identity of LGAs to be expressed in their LSPS.
2. **District Plans:** Reinstate District Plans, which provide a vital middle ground for sub-regional collaboration. Without them, there is a "strategic vacuum" between high-level regional goals and local implementation.
3. **Hierarchy of Planning Priorities:** A clear conflict resolution mechanism is required to ensure qualitative priorities (Resilience/Liveability) are not automatically traded away for quantitative ones (housing targets).
4. **Binding Infrastructure Commitments:** Shift from "coordinated" planning to funded and scheduled delivery, ensuring infrastructure is active *before* or *concurrent* with population growth.
5. **Strategic Autonomy:** Redefine the role of Local Government from "compliance agents" to strategic partners whose local constraints (heritage, biodiversity) inform state targets.

1. Procedural Concerns

1.1. Absence of Critical Detail

The Discussion Paper lacks the detail necessary for a meaningful assessment. Key components—specifically the Statewide Land Use Plan and the revised Local Strategic Planning Statement (LSPS) guidelines—remain unseen. It is difficult for Council to provide an informed critique of a "three-tiered" system when the top tier (Statewide) and the foundational tier (Local) are not yet defined.

1.2. Inadequate Consultation Period

The exhibition of these landmark documents during the January/February period is highly problematic for Local Government. This timeframe reduces the number of days staff have to formulate a response, given that critical staff are on leave and the first Council meeting of the year is scheduled for mid-February. It also materially limits opportunities for meaningful public consultation and community engagement. Choosing to exhibit during January/February risks undermining genuine collaboration with local authorities and the community by constraining both institutional and public participation in the process.

2. Visionary Planning vs. Interpretation of Growth

The Discussion Paper predicts a state population increase of 1.84 million by 2045, with 1.2 million (65%) concentrated in Sydney. The paper treats this concentration as an inevitability rather than a policy choice.

There is no evidence of a visionary decentralisation strategy aimed at directing growth to struggling regional areas in order to alleviate pressure on Sydney.

3. Risk of "Knee-Jerk" Planning

The proposed "modular" and "dynamic" system—while sounding flexible—increases the risk of political "knee-jerk" reactions. Strategic planning requires careful deliberation to avoid generational errors. A "fast" system is often prone to poor outcomes and undue influence.

4. Analysis of the Proposed Three-Tiered Framework

The 3-tier framework of planning documentation proposed in the Discussion Paper includes:

- A State Land Use Plan (Statewide priorities)
- Region Plans (Spatial strategies and sequencing)
- Local Strategic Plans (Delivery via zoning and local plans)

The removal of District Plans is a retrograde step for the Greater Sydney region. In a city as complex as Sydney, District Plans provide a vital middle ground for sub-regional collaboration. Without them, there is a "strategic vacuum" between high-level regional goals and local implementation. Adjoining Councils lose a formal mechanism to collaborate on matters of sub-regional relevance, such as shared catchment management, climate hazards and cross-boundary transport corridors.

5. Top-Down Implementation vs. Local Autonomy

The assigned responsibilities proposed in the Discussion Paper suggest a rigid, top-down hierarchy in which the State "sets priorities" and Local Government merely "delivers outcomes." This reduces Local Government to a "compliance agent" rather than a strategic partner. A truly resilient system must allow for a bottom-up strategy, where local constraints (such as Ku-ring-gai's unique biodiversity and heritage) inform state-level targets, rather than being overridden by them.

6. Seven Statewide Planning Priorities

The Discussion Paper identifies seven priorities as the 'heart' of the proposed planning framework. Council has significant concerns about their presentation and content:

6.1. The "False Equivalency" Problem (No Established Hierarchy)

By presenting seven "equal" priorities, the framework abdicates responsibility for determining how difficult policy trade-offs will be addressed. In a contested environment, a priority with a quantifiable metric (e.g., "Housed" with its legislated dwelling targets) will naturally override qualitative priorities (e.g., "Liveable" or "Resilient"). Without a weighted hierarchy or a conflict-resolution mechanism, the "Resilient" and "Liveable" categories risk becoming secondary considerations routinely traded away to achieve housing supply.

6.2. Simplistic Outcomes vs. Complex Risks

The 'Success' definitions provided for the seven land use priorities are narrow and 'outcome blind.' For example, success for the land use priority *Prosperous* is defined by increasing the number of jobs or the total amount of land zoned for employment. However, this metric ignores economic diversity and resilience. It views a retail service job at minimum wage as equivalent to a high-value manufacturing or technical job. Success for the land use priority *Resilient* is defined as 'withstanding hazards,' which is a reactive stance. It fails to address proactive mitigation, such as urban cooling or mandatory net-zero building standards.

6.3. "Coordinated" as a Substitute for "Commitment"

The 'Coordinated' priority is process-oriented rather than delivery-oriented. Success is defined as infrastructure being 'planned' to support growth. In Ku-ring-gai, the existence of a railway station does not equate to adequate social infrastructure. Many of the areas targeted by the State's recent housing reforms lack sufficient local parks and community facilities. Accordingly, the alignment of land use and infrastructure is insufficient. There must be a binding commitment to infrastructure delivery. Growth should not be activated until the supporting infrastructure is not only 'planned' but also funded and scheduled.

Conclusion

Ku-ring-gai Council calls for an immediate pause in the finalisation of this framework until all tiers of the plan are exhibited and dispute mechanisms are established. True strategic planning cannot be reduced to housing delivery; it must be a data-driven system that safeguards infrastructure capacity, addresses climate change, protects environmental assets, and upholds intergenerational equity to ensure enduring urban stability.



Ku-ring-gai Council Submission

The draft Sydney Plan

Department of Planning Housing and Infrastructure

February 2026

Executive Summary

Ku-ring-gai Council acknowledges the ambitious scope of the draft Sydney Plan and its objective to accommodate 1.2 million additional people —approximately 65% of the state's projected growth—over the next 20 years. While Council supports the strategic intent of leveraging existing transport corridors for housing, the current draft presents an unsubstantiated framework that prioritises economic advantage and rapid densification at the expense of environmental protection, a climate resilient focus and community liveability.

Effective city-building requires a balance of social, economic, and environmental drivers. This submission outlines Council's concerns regarding the plan's reliance on infill development without infrastructure assessment or guarantees, the omission of environmental and heritage protections, and the critical need for broader policy reform to ensure that the cost of rapid housing supply translates into the promised benefit of genuine affordability.

1. Key Recommendations

1.1 National Housing Accord (NHA): Housing Targets and Market Realities

Driven by the (NHA) the NSW Government has committed to deliver 263,400 homes in Sydney over the next five years. Notably, 77% of this target is to be concentrated as infill development in Central and Eastern Sydney¹.

These housing targets are predicated on the assumption that increased supply will suppress housing prices. However, without complementary policy action to address high immigration, investor-driven vacancy rates, and the impact of short-term rental platforms (Airbnb/Stayz), there is a significant risk that new supply will be absorbed by the investment market rather than providing relief for local residents.

Aggressive housing delivery to accommodate growth will have escalating environmental and social costs. The draft Sydney plan acknowledges that some critical infrastructure in Sydney is nearing capacity; for instance, the *region's landfill capacity for household waste is projected to be exhausted by 2030* (p. 42). Therefore, greater certainty must be provided that increased housing supply will deliver the forecast benefits.

Recommendation

Housing targets must be supported by broader policy reforms to ensure that "increased supply" results in measurable improvements to housing affordability.

¹ Central & Eastern Sydney encompasses 25 LGAs; only the 8 LGAs of the Western Sydney precinct are excluded (Blue Mountains, Camden, Campbelltown, Fairfield, Hawkesbury, Liverpool, Penrith, and Wollondilly).

1.2 Infrastructure Capacity and Funding Equity

A critical flaw in the draft plan is the lack of detailed infrastructure support for high-growth infill areas. The plan suggests that Central and Eastern Sydney possess "high growth capacity" due to sufficient existing amenities (p. 23). This is not supported by evidence; for example, the 2023 NSROC Review of Sports Facilities identifies a 40% capacity shortfall by 2026—a figure determined before the TOD, LMR and current housing targets were announced.

Concern over the lack of state funding for infrastructure in areas facing significant increases in density is compounded by the state government's 2025 exhibition of the Housing Productivity Contribution Scheme – Works-in-Kind Guideline.

The Works-in-Kind Guideline grants the State broad discretion to redirect developer contributions from high-density infill projects to 'priority projects' in unrelated regions. This creates a significant risk that infrastructure funding generated in Central and Eastern Sydney will be decoupled from the very communities bearing the brunt of the intensification. This is foreshadowed in the draft Sydney Plan.

*Infill development, coupled with staged **delivery of infrastructure and services in greenfield areas**, will enable high growth right across the region in the medium and long term (P 23).*

Residential development in Western Sydney, which includes the greenfield areas, remains predominantly low-density; 81% of housing in Western Sydney consists of detached dwellings (P. 21). There is insufficient justification in the draft plan for the disproportionate intensification of Central and Eastern Sydney, if these areas will not benefit from development contributions, as they are being used to fund further low-density housing in the West.

Recommendation

The Department must publish the baseline infrastructure capacity modelling used to justify the 'high growth capacity' designation for infill LGAs. Additionally, Council requires formal guarantees that Housing Productivity Contributions collected within TOD and LMR precincts are ring-fenced for infrastructure delivery within those same precincts.

1.3 Learnings from the 2018 Greater Sydney Region Plan (GSRP)

The draft Sydney Plan will replace the 2018 GSRP, which has guided growth for seven years. To maintain strategic continuity, the new plan must demonstrate how it builds upon the implementation successes and challenges of its predecessor.

Recommendation

DPHI should provide an evidence-based review of the learnings from the 2018 GSRP and demonstrate their application within the new Sydney Plan.

1.4 Agency Integration

The 2018 GSRP explicitly references multi-agency strategic documents and initiatives. This alignment provides stakeholders with confidence that NSW Government agencies are working under a shared, whole-of-government vision for sustainable growth.

By contrast, the omission of comparable cross-agency alignment in the draft Sydney Plan suggests limited inter-agency coordination. This risks a siloed approach that prioritises housing supply at the expense of liveability and long-term sustainability. For example, the list of references cited at the end of the draft Plan excludes several critical strategies necessary to inform a holistic land-use framework, including the *NSW Plan for Nature 2024*, *NSW Waste and Sustainable Materials Strategy 2041*, *Connecting NSW Strategy (Transport for NSW, 2025)*, the *Resilient Sydney Strategy 2025–2035*, and the *2025 Education Rebuild Plan*.

This concern is increased due to the action items in the Sydney Plan apply only applying to DPPI and local government. Without the clear involvement and commitment of other key state agencies—such as the Departments of Health, Education, Climate Change and the Environmental Protection Authority (EPA) — there is limited confidence that the draft Plan will deliver sustainable, adequately serviced development.

Recommendation

The Department of Planning, Housing and Infrastructure (DPHI) must develop and publish an Integrated Infrastructure and Constraints Map that aligns housing targets with the specific delivery timelines of partner agencies (including Education, Health, Transport, Climate Change and the EPA). This cross-agency synthesis must be embedded within the final Sydney Plan to provide a transparent guarantee that rapid housing delivery will not compromise long-term urban resilience, serviceability, or environmental standards.

1.5 Sequencing, Resourcing and Timing

The Department has advised that it is currently reviewing the Local Strategic Planning Statement (LSPS) framework. Despite this, the draft Sydney Plan includes actions that require councils to undertake work that is contingent on the completion of the LSPS review. This creates uncertainty and places councils in the position of being expected to progress tasks without the necessary policy direction. More broadly, the volume of work proposed for councils under the draft Plan is substantial, the specified timeframes are tight, and there is no clear indication from the State Government as to how this additional workload is to be resourced.

Recommendation

The draft Sydney Plan should be amended to clearly sequence council actions, so they align with the completion of the LSPS review and provide councils with realistic time frames to meet specified planning requirements. In addition, the State Government should identify appropriate resourcing, funding, and support mechanisms to enable councils to deliver the proposed actions.

1.6 Heritage and Place-Making

The Draft Plan is notably silent on the significant role heritage plays in placemaking. In a marked departure from the 2018 GSRP—which referenced heritage 75 times and established 'heritage conservation and enhancement' as a core objective—the current draft Plan mentions heritage only three times and lacks a formal definition. This diminished focus on the value of heritage is also evident in recent Transport-Oriented Development (TOD) and Low- and Mid-Rise (LMR) housing policies, which

risk facilitating unsympathetic development within established heritage conservation areas.

Collectively, these omissions indicate a lack of foresight, and an insufficient understanding of the role heritage plays in enhancing the liveability of modern cities. Heritage provides continuity and identity amid change, underpinning long-term social and cultural resilience. When heritage considerations are marginalised, development risks producing placeless outcomes that erode community character.

Recommendation

Reintroduce a formal definition of heritage and include policy objectives and metrics that prioritise the identification, conservation and enhancement of heritage assets as essential components of liveability.

1.7 Environmental Stewardship

The current draft Plan treats the environment primarily as a resource to cool urban areas (canopy cover) and to provide open space for residents of high-density apartment blocks. It is not recognised as having intrinsic value that warrants protection.

This is a significant oversight; as when riparian lands and local ecosystems collapse, we lose the natural resilience and carbon sequestration required to mitigate rising temperatures, creating a feedback loop of environmental decline.

While the document uses high-level language about the "protection and enhancement" of the natural environment, the actionable items are disproportionately narrow, focusing almost entirely on urban greening and tree canopies. These actions must be supplemented and include mandated reductions in the embodied carbon of building materials, as urban expansion and the construction industry are significant contributors to greenhouse gas emissions.

Recommendation

Establish clear, legally binding metrics to protect biodiversity, riparian lands, coastal lands and waterways. These must go beyond simple canopy percentages to include:

- Ecological Integrity: Protect existing environmentally sensitive habitats from fragmentation caused by new development.
- Climate Neutral Growth: Require all new building growth to account for and mitigate its lifecycle greenhouse gas contributions to ensure consistency with government's net zero GHG emissions by 2050.
- Systemic Resilience: Recognise that protecting the natural environment is a primary strategy for climate mitigation, ensuring both generational equity and ecological sustainability.

2. Recommendations related to the 12 Planning Responses in the draft Sydney Plan

Planning Responses	Recommendations
1. Implement Sydney housing targets	<ul style="list-style-type: none"> Refer to section 1.1 National Housing Accord (NHA): Housing Targets and Market Realities Include 10- and 20-year housing targets to assist council strategic planning and infrastructure integration. Clarify the triggers for State intervention in local housing supply and the impact of State Significant Developments (SSDs) and ongoing Housing Development Authority (HDAs) approvals on housing targets.
2. Increase Housing Diversity and Choice	<ul style="list-style-type: none"> Adopt a collaborative approach to any further low-rise housing initiatives, enabling councils to tailor responses to topography, heritage, environmental & infrastructure constraints.
3. Secure the supply of affordable housing	<ul style="list-style-type: none"> Review the 30% bonus scheme to address regional price variations. In high-value LGAs like Ku-ring-gai, "30% below market" is still inaccessible to low-income earners.
4. Grow well-located jobs	<ul style="list-style-type: none"> Clarify Action 4.2: allowing jobs "out of centres" appears to contradict the plan's mandate to concentrate growth along public transport routes.
5. Align infrastructure to planned growth	<ul style="list-style-type: none"> Refer to section 1.3 Infrastructure and Funding Equity. Ensure the Urban Development Program (UDP) dashboard and Employment Lands Development Program data are updated regularly to reflect current targets.
6. Create a more vibrant Sydney	<ul style="list-style-type: none"> Refer to section 1.5 Heritage and Place Making.
7. Grow and connect public open space	<ul style="list-style-type: none"> Open space must be clearly defined and mapped in the draft Plan, and any targets for open space must be developed in collaboration with councils. Council has a developed a detailed blue green grid network which would inform state mapping.
8. Secure an ongoing pipeline of productive industrial lands	<ul style="list-style-type: none"> Any intervention to intensify regionally significant industrial land must be done in consultation with councils, and where the need for additional state infrastructure is identified, committed funding is to be provided prior to intensification.
9. Minimise the impact of natural hazards on communities	<ul style="list-style-type: none"> Climate change is not adequately prioritised in the draft Plan, and its scope of consideration is overly narrow. The Plan should expand its focus to explicitly address the impacts of climate-related hazards on biodiversity, waterways, waste generation, waste infrastructure and rural lands. With the removal of district plans the Sydney Plan must assume a stronger strategic leadership role in guiding and integrating cross-government action on climate resilience.
10. Sequence growth in greenfield areas	<ul style="list-style-type: none"> Not applicable
11. Manage land use beyond the urban footprint	<ul style="list-style-type: none"> Not applicable
12. Protect and enhance the natural environment	<ul style="list-style-type: none"> Refer to section 1.6 Environmental Stewardship.

3. Recommendations related to action items in the draft Sydney Plan (refer to Table 1 below)

Conclusion

Ku-ring-gai Council calls for a strategic pause and a fundamental reassessment of the draft Sydney Plan. For the Plan to achieve its objectives, it must transition from a narrow focus on dwelling targets to a sophisticated, evidence-based framework.

The Council advocates for housing supply alongside a strategic vision that prioritises quality of life, sustainability and urban resilience.

Table 1: Commentary/recommendations on the action items included in the Sydney Plan

Response 1: Implement Sydney housing targets			
Responsibility: NSW Government Actions		Timing	Comments/Recommendations
1.1	Develop and implement a revised housing supply and diversity monitoring framework	2026–27	Support: Evidence-based data supports robust decision-making. Include monitoring of how essential infrastructure is coping with increased housing supply.
1.2	Continue to investigate and implement new statutory provisions to fast track assessment of Council-led housing proposals	2026 and ongoing	Support
1.3	Lead planning interventions to increase housing supply if Councils fail to meet housing target requirements	2026 and ongoing	Clarity is required on the triggers for intervention and the metrics used to determine whether Councils have ‘met’ the housing targets. Are housing approvals or housing completions to be counted? Many factors, including housing completions, are outside of Council’s control.
Responsibility: Council Actions			Comments/Recommendations
1.4	Review and update local strategic planning and local environmental plans to align with the Sydney Plan and provide sufficient feasible capacity to meet housing targets	2027 and ongoing	<p>For councils to meet housing targets, guidelines are required on how councils affected by DPHI’s TOD and LMR housing policies should interpret the targets. Within Ku-ring-gai, saved SSDs in the TOD precincts have the potential to add 4,200 dwellings. Additionally, the HDA’s ability to spot re-zone land to address large housing projects impacts the Council’s strategic planning.</p> <p>Commitment should be provided to Councils that have undertaken re-zoning to meet housing targets, that further re-zonings will not be processed through HDA applications.</p> <p>The phrase ‘provide sufficient feasible capacity to meet housing targets’ requires clarification. Is feasible capacity impacted by insufficient open space for the forecast population?</p>
Response 2: Increase housing diversity and choice			
Responsibility: NSW Government Actions		Timing	Comments/Recommendations
2.1	Review development standards for dual occupancy development to establish a consistent approach across NSW	2026	Endorsed by DPHI, Ku-ring-gai Council has undertaken extensive work to determine a minimum allotment size for dual occupancies in their LGA. This ability to prepare a tailored approach must be reflected in further development standards related to dual occupancy.
2.2	Complete master plans and State-led rezoning precinct studies for priority Metro West, Sydney Metro – Western Sydney Airport, Stage 2 light rail and rapid bus networks	2027–28 and ongoing	Ku-ring-gai Council supports the urgent and accelerated delivery of the Mona Vale to Macquarie Park rapid bus line to improve transport capacity and accessibility not only for Ku-ring-gai residents, but for the surrounding LGAs of City of Ryde, Northern Beaches Council and beyond.
2.3	Investigate planning control incentives relating to housing diversity and requirements for family-friendly apartments in mid and high-rise residential development	2026	Support

2.4	Update guidance to consent authorities, industry and the community to make sure the Apartment Design Guide is being used flexibly to achieve positive objectives evaluated through merit assessment	2026	Input should be obtained from Council’s across Sydney, particularly those with high housing targets or impacted by TOD or the LMR housing policies. Increased density has significant waste implications, which must be addressed at the design stage and therefore incorporated into any Apartment Design Guide updates or implementation policies.
2.5	Investigate further opportunities for low rise attached housing	2027	A one-size-fits-all approach will not be supported. Input should be obtained from Council’s across Sydney, particularly those with high housing targets or already impacted by TOD or the LMR housing policies.
Responsibility: Council Actions		Timing	Comments/Recommendations
2.6	Review local environmental plans, local contribution plans and development control plans relating to Low and Mid-Rise Housing Areas designated under the Low and Mid-Rise Housing Policy	2026	DPHI to provide further details on required timeframes and any available monetary assistance to support this work program.
2.7	Identify areas outside Low and Mid-Rise Housing Areas that can accommodate more diverse housing choice based on public transport connections to stations	2026–27	Clarity is required regarding whether this applies to councils that have already demonstrated their capacity to meet short and long-term housing targets.
2.8	Review minimum lot size requirements for dual occupancies outside Low and Mid-Rise Housing Areas	2026–27	Ku-ring-gai Council has already undertaken this process, and the work has been endorsed by DPHI.
2.9	Consider more ways to provide high density development around stations and other transit hubs, where appropriate and feasible	2026–27	Through transport impact assessments for TOD centres, Ku-ring-gai has found that beyond access to rail services, there are significant gaps in feeder and regional bus operations, state road network capacity constraints and absence of regional active transport infrastructure, and this has not been addressed, and would constrain any further opportunities. More funding from the Housing Productivity Contributions should be directed to road and active transport infrastructure upgrades on state routes, and to bus operations, including improved bus frequencies at the PM peak but this has not been addressed in the Plan
Response 3: Secure the supply of affordable housing			
Responsibility: NSW Government Actions		Timing	Comments/Recommendations
3.1	Deliver an Affordable Housing Contribution Scheme toolkit to support Councils to fast-track the preparation and adoption of an affordable housing contribution scheme	2026–27	Ku-ring-gai Council supports this initiative. This type of contribution scheme should be universal in order to ensure the costs are factored in at the initial development concept stage.
3.2	Maximise the affordable housing outcomes delivered under Transport Oriented Development and infill affordable housing programs by creating more flexible arrangements for contributions	2029	It is not clear what is meant by “more flexible arrangements” for contributions. Tier One CHPs often prefer a consolidated building to scattered apartments across multiple strata schemes. The current legislation under sec86A of the Environmental Planning and Assessment Regulation does not appear to permit asset recycling when a dedication in-kind has reached the end of its economic life, nor does it provide an exit strategy for the CHP at this time.

Responsibility: Council Actions			Comments/Recommendations
3.3	Prepare and adopt an affordable housing contribution scheme	2027	Council prepared and adopted an Affordable Housing Contributions Scheme as part of the alternative development scenario for the Transport-Oriented Development Program. It is supported by an adopted Affordable Housing Policy and can be amended to add outcomes from private planning proposals.
3.4	Identify surplus Council-owned land for affordable housing	2027	Considering the population increases expected in Ku-ring-gai due to the State's TOD and LMR housing policies, and the lack of open space around the Council's transport nodes, any surplus land will be used to generate revenue to purchase land for residential parks or for the provision of waste infrastructure which is lacking at the regional and state levels.
Response 4: Grow well-located jobs			
Responsibility: NSW Government Actions			Comments/Recommendations
4.1	Finalise the centres policy including guidance on mixed-use or residential zoned land in and around a commercial core.	2025–26	Support. This policy must be prepared in collaboration with the Councils. Mixed use areas often have different service requirements than residential areas, particularly for loading docks and waste removal trucks. Safety is a major consideration in these interchange areas.
4.2	Review and update employment zone planning policy for centres	2025–26	Support
Responsibility: Council Actions			Comments/Recommendations
4.3	Review and update planning controls for E1 and E2 zones within the identified Low and Mid-Rise Housing Areas to increase floor space for goods and services to meet the needs of new residents and to consider shop top housing	2027	Support. Within Ku-ring-gai's E1 zones, shop-top housing is already a permissible use. Ku-ring-gai has no E2 zones. Collaboration between the State and Council is required to address the rating and servicing of shop-top housing. The current rating systems favour a singular use for the application of rates, making it problematic for councils to provide a residential waste service to a commercial-rated property.
4.4	Investigate and implement revised statutory provisions to enable new jobs in and out of centres, including responding to infrastructure availability	2026 and ongoing	Further clarity around the overall intent of this action and the specific tasks Council must undertake is required. It seems to contradict the Sydney Plan's premise of focusing density around transport or service nodes.
Response 5: Align infrastructure to planned growth			
Responsibility: NSW Government Actions			Comments/Recommendations
5.1	Develop and annually update the Sydney Infrastructure Opportunities Plan	Ongoing	The annual update of Sydney infrastructure opportunity plan (SIOPs) is supported, it is noted that in the current State Infrastructure plan the critical need for more waste transfer stations and waste landfill sites is not identified, even though the Sydney Plan identifies the cities landfill site for household waste will be at capacity by 2030. The critical link between transport bottlenecks and efficient waste disposal systems should factor in SIOPs.

5.2	Publish best practice guidance for Councils when planning for and providing local infrastructure	2026–27	This initiative is supported; however, Ku-ring-gai Council is already well progressed in a comprehensive review of our s7.11 contributions plan to cater for the anticipated redevelopment in this LGA, brought about by the TOD and LMR Housing policies. Noting DPHI’s expected publication date, it is recommended that DPHI work collaboratively with councils who are well progressed in this area to ensure alignment of outcomes.
Responsibility: Council Actions			Comments/Recommendations
5.3	Use UDP and ELDP data to inform infrastructure planning at the local level	2026 and ongoing	For this to be practical, the UDP needs to be much more responsive and dynamic. In the case of Ku-ring-gai, the UDP dashboard still shows an expected 5-year dwelling yield of 1,605 dwellings, which has not been updated since before the gazettal of the TOD legislation nearly two years ago. The TOD policy enabled the addition of approximately 22,000 dwellings in Ku-ring-gai.
5.4	Regularly review infrastructure contributions plans to reflect infrastructure priorities and staging through the UDP and ELDP	Minimum every 4 years, aligned to Council delivery programs	This action is generally supported; however, flexibility must be built into the review cycle to address the imminent release of census data. Additionally, a contributions plan that requires review by IPART and DPHI has additional time-factors outside council’s control.
5.5	Review infrastructure schedules to reflect land use planning directions and current works and land acquisition costs	Minimum every 2 years from 2026	If this work is to occur every two years, DPHI must clarify how the re-exhibition and IPART review requirements will be met. Having an effective inflationary mechanism has been sufficient in lieu of formal QS cost estimates on such a frequent basis.
5.6	Identify specific planned infrastructure works to be delivered within Council delivery programs and operational plans	2026 and ongoing	Ku-ring-gai Council maintains a long-term financial plan that incorporates the rolling works program that is wholly or partly funded by local infrastructure contributions, which relates closely to the Delivery and Operational plans
Response 6: Create a more vibrant Sydney			
Responsibility: NSW Government Actions			Comments/Recommendations
6.1	Activate key arts and entertainment precincts, and promote cultural institutions, state-owned performance venues and cultural festivals through flexible zoning controls, active street frontage requirements and expedited planning pathways	2026–29	Ku-ring-gai generally supports this action but requests further information and collaboration regarding any flexible zoning control and expedited planning pathway initiatives. Council notes the State’s response to the ‘Liveability’ objective is to ‘ <i>Create a more Vibrant Sydney</i> ’. This suggests entertainment is being offered in place of infrastructure that makes everyday life more interesting and enjoyable such as access to green space, sporting fields, protection of heritage and biodiversity plus functioning water, waste and energy services. It is recommended that the narrow focus of the Sydney Plan in this area be expanded.
6.2	Consult with Councils and communities to establish special entertainment precincts where appropriate in State-led rezonings and state significant development	2026–29	Support

Responsibility: Council Actions			Comments/Recommendations
6.3	Establish special entertainment precincts where appropriate to accommodate critical community, arts, cultural and retail uses as part of Council-led precinct planning	2026–29	Council supports the incorporation of Special Entertainment Precincts to promote vibrancy. Council has a nighttime economy strategy which provides guidance on areas where opportunities exist to expand upon existing offerings.
Response 7: Grow and connect public open space			
Responsibility: NSW Government Actions			Comments/Recommendations
7.1	Review and refine the identified network of high priority blue-green grid corridors	2026–29	Support. Background data on the selection process for the high-priority blue-green corridors must be provided, along with opportunities to build on these corridors (i.e., add the walking tracks from Roseville to St Ives in the Garigal National Park). Council has a developed blue green grid network which could be used to inform state mapping.
7.2	Deliver projects and programs to create or expand metropolitan public open space	2026–29	Support. The accuracy of mapping must be reviewed. Currently, national park areas such as the Garigal National Park and Lane Cove National Park are mapped as open space and potentially private golf courses. A clear definition of open space would assist.
7.3	Provide open space provision, guidance and targets	2026–27	<p>This must be done in consultation with Councils working across LGA boundaries, and with funding mechanisms in place to ensure targets are more than aspirational. In infill areas high land values make purchasing land for open space purposes prohibitive. This issue is acknowledged on page 40 of the draft Sydney Plan.</p> <p>When targets are released, they must be accompanied by an explanation of how the targets were quantified. In the draft Plan the key determinant in prioritising open space is articulated as “areas with lower open space provision”, but this is not quantified. Ku-ring-gai appears not to be mapped as a high-priority area, with a projected open space provision of >3ha/1000 for 2045. This creates uncertainty about the scale of future provision required. Similarly, there is no mapping or comparison of areas projected to experience population growth that will outstrip the current supply of open space.</p> <p>The open space mapping provided needs improvement for clarity and consistency.</p>
Responsibility: Council Actions			Comments/Recommendations
7.4	Review Councils’ existing and future open space provision and identify local opportunities to align with NSW Government’s open space outcomes	2027–29	<p>Council has completed this as part of the Ku-ring-gai Recreation Needs Study (2024). Council awaits the targets from the State Government to assess alignment with the State’s open space outcomes.</p> <p>Open space outcomes are defined by population density. Clarification is sought on how Councils can maintain existing open space ratios when they are subject to significant population increases. This is particularly relevant in the TOD areas of Roseville, Lindfield, Killara and Gordon. For these TOD precincts, the Council has identified open space acquisition opportunities however funding acquisition will be challenging due to high land costs.</p>

			A definition of Public Open Space is required in the Sydney Plan. Ku-ring-gai's rate of public open space to resident population is dependent on whether National Parks are included. When these natural areas are removed, our open space provision drops significantly.
Response 8: Secure an ongoing pipeline of productive industrial lands			
Responsibility: NSW Government Actions		Comments/Recommendations	
8.1	Investigate interventions to support the intensification of significant industrial lands	2026	<p>Pymble Business Park has been identified as regionally significant industrial land. While Ku-ring-gai supports the categorisation of this land, it notes that the area is bound on 2 sides by state roads with limited access, and environmentally sensitive lands on the 3rd side. Accordingly, any plans to intensify the use of this area must be supported by detailed transport investigations and any required upgrades must be provided with state funding prior to intensification.</p> <p>State interventions may be appropriate to support the development of circular economies and climate-neutral industries. Waste infrastructure needs state-level direction to encourage and support industry investment.</p> <p>The State needs to assess whether locating data management centres on valuable industrial land optimises resource use.</p>
8.2	Update the Employment Lands Development Monitor to align with categorisation	2026	Support
8.3	Review the industrial lands categorisation every 2 years	From 2027	Support. The EPA recently conducted a survey to identify potential temporary sites for short-term waste storage. These sites may need to be categorised as regionally significant industrial lands if they are not already, and protected from further development, particularly residential.
8.4	Identify potential new industrial land	2027	This initiative is supported as long as it is done in consultation with the impacted Councils.
8.5	Publish Sydney's priority employment areas and investment program	2026	Support
8.6	Track the supply pipeline to support timely investment and rezoning decisions	2026 and ongoing	Additional metrics are required to ensure certainty regarding the State's commitment to providing a pipeline of serviced industrial land.
Responsibility: Council Actions		Comments/Recommendations	
8.7	Review locally significant industrial lands in line with the draft statewide policy and incorporate into future local planning	2026 and ongoing	Ku-ring-gai does not have any land designated as 'locally significant industrial lands'.

8.8	Update local zoning of industrial lands to be consistent with the statewide policy	2026–27	Support
Response 9: Minimise the impact of natural hazards to communities			
Responsibility: NSW Government Actions		Comments/Recommendations	
9.1	Implement relevant land use planning directions outlined in the Hawkesbury-Nepean Valley Disaster Adaptation Plan (DAP)	2026–27	Support
9.2	Develop and release guiding principles for building back better after natural disasters	2026	Support. This work must reference the recently released NSW Waste and Sustainable Materials Strategy 2041 . Planning and preparing for the management of waste generated by emergencies should maintain the principles enshrined in this document for the emergency management spectrum of prevention, preparation, response and recovery.
9.3	Develop and release resilience assessment package to support building resilient communities and guide the considerations of natural hazard risk in settlement planning	2026	Support. This must be done in consultation with councils and the relevant state agencies and reference recent state publications on mitigation of heat, coastal hazards, bushfire and flood risk considerations for settlement planning.
9.4	Develop and release guidance for considering tolerable natural hazard risk in planning decisions	2026	This must not be a one-size-fits-all exercise. It must be done in consultation with councils and the relevant state agencies, and reference Council’s in-depth knowledge of the hazards in their areas and recent state publications on mitigation of heat, coastal hazards, bushfire and flood risk considerations for settlement planning. It is noted that there is an existing NSW Flood Risk Management Manual and Flood Prone Land Package, and that Appendix I of the Sydney Plan repeats flood and emergency planning principles out of context, further complicating the flood planning process.
Responsibility: Council Actions		Comments/Recommendations	
9.5	Review hazard studies using up-to-date, local place-based data on current and future exposure and vulnerability to hazards to inform land use and infrastructure planning decisions	2026 and ongoing	This action is supported, but clarity is required on how the state's resilient/hazard documentation addressed above is intended to interact with the council’s hazard data. Council’s work will become inconsequential if a purely top-down approach is applied.
9.6	Relevant Councils to implement coastal management programs and associated planning actions	2026 and ongoing	NA
9.7	Relevant Councils to prepare DAP implementation plans that outline how the Hawkesbury Nepean Valley DAP will be implemented through local strategic planning	2026–27	NA

Response 10: Sequence planned growth in greenfield areas within the urban footprint			
Responsibility: NSW Government Actions			Comments/Recommendations
10.1	Develop a medium-term sequencing plan for greenfield precincts in Sydney	2027–28 and ongoing	NA
Response 11: Manage land uses beyond the urban footprint			
Responsibility: NSW Government Actions			Comments/Recommendations
11.1	Undertake a Sydney rural lands study to map productive uses, critical infrastructure and important supply chains beyond the urban footprint	2026–27	NA
11.2	Investigate planning policy interventions to increase the productivity of rural lands including through agribusiness innovations, diversification and the inclusion of new productive uses	2027–29	NA
11.3	Finalise the urban footprint mapping and associated strategic policy	2027	NA
Responsibility: Council Actions			Comments/Recommendations
11.4	Relevant Councils to review the interface between the urban and rural lands to inform the urban footprint	2026	NA
Response 12: Protect and enhance the natural environment			
Responsibility: NSW Government Actions			Comments/Recommendations
12.1	Update tree canopy capture data and mapping for Sydney	Every 2 years	This action is supported as long as the two-year cycle considers the Council’s annual reporting schedules.
12.2	Develop an urban greening guide for Sydney	2026	This action is supported with meaningful consultation and acceptance of tailored responses at the local level.
Responsibility: Council Actions			Comments/Recommendations
12.3	Develop locally appropriate canopy and greening targets	2026-30	To establish realistic canopy and greening targets, Ku-ring-gai needs certainty that these targets will be valued and protected. The HDA's potential to undertake further spot rezonings in Ku-ring-gai demonstrates a continued bias toward supporting housing provision over canopy provision.



Ku-ring-gai Council Submission

Statewide Policy for Industrial Lands

Department of Planning Housing and Infrastructure

February 2026

Executive Summary

Ku-ring-gai Council welcomes the opportunity to comment on the draft *Statewide Policy for Industrial Lands*. Council commends the NSW Government for introducing a formalised framework for categorising industrial lands. Transitioning from the previous "retain and manage" approach to a structured, three-tiered classification system provides much-needed clarity for long-term strategic planning.

The use of the Employment Lands Development Monitor (ELDM) is a significant advancement in ensuring industrial lands are protected through evidence-based decisions rather than ad-hoc, speculative rezoning. While Council supports the policy's direction, we recommend a series of targeted amendments to increase clarity, address current challenges, and ensure it is underpinned by quantifiable benchmarks.

Key Recommendations

- 1. Land Classification:** Strong support is provided for the classification of the Pymble Business Park (E3 zoned land) as 'Regionally Significant' industrial land. Given Ku-ring-gai's lack of a deep industrial land bank, the policy's directive to not support residential uses on 'Regionally Significant' land is essential for maintaining the viability of this area.
- 2. Climate change:** The NSW Government has committed to reach net zero GHG emissions by 2050, including a 50% emissions reduction on 2005 levels by 2030 so it is appropriate to include explicit Net Zero targets and climate resilience within the policy's core objectives.
- 3. Infrastructure Funding Gap:** Intensification of 'Regionally Significant' lands should not result in a net-cost transfer to local councils whose rate bases are already constrained by the rate peg. The intensification of Regionally Significant land (such as Pymble) will inevitably place a disproportionate burden on local road networks, intersections, and drainage systems. Therefore, where 'Regionally Significant' lands are to be intensified, the policy must specify the State funding mechanisms available to ensure the necessary upgrades to infrastructure.
- 4. Expanded Application:** Extend the scope of *Technical Note 2 – Considering Alternate Land Uses* to include the E1 Local Centre zone, not just the E3 Productivity Support, E4 General Industrial and E5 Heavy Industrial zones. This will provide Council with a much-needed framework to assess applications for alternative land uses on increasing valuable urban services land.
- 5. Additional Permitted Uses:** *Technical Note 2*, references expanding the use of the 'Additional Permitted Use' provisions to enable uses that 'align' with the objectives of the relevant industrial zone. Further details, including a strict definition of the word 'align,' must be provided for consultation before this change is adopted. Council cautions that this change may lead to a plethora of 'quasi' spot rezonings that lack strategic merit.
- 6. Quantifiable, time-bound success metrics.** The policy lacks measurable metrics to assess its success. These are necessary to provide greater certainty to users and ensure alignment with Government commitments.
- 7. Review Certainty:** A fixed 5-year review cycle is required, aligned with the Regional Plan review cycle.

1. Policy Objectives

Council supports the six draft objectives underpinning the policy but contends that an expanded scope is necessary to navigate modern challenges such as climate change and infrastructure delivery:

1.1 Climate & Net Zero

The policy does not currently recognise the critical role of industrial land in supporting the energy transition. Industrial precincts are essential to circular economy activities, including recycling and waste transfer stations, and uses such as these should be prioritised. It is recommended that the policy include an explicit objective linking industrial land use to the State's Net Zero 2050 targets

1.2 Infrastructure Sequencing

Designating land as 'Regionally Significant' creates an expectation of intensification. Where this is to occur, the objectives must commit the State to the timely provision of supporting infrastructure, potentially through the Housing and Productivity Contribution scheme or Waste levy for waste infrastructure.

1.3 Encroachment Protection

The policy objectives should explicitly articulate how the three-tier industrial land framework provides differentiated levels of protection from encroachment by incompatible uses.

2. Implications for the Ku-ring-gai LGA

The draft *Sydney Industrial Land Categorisation* map identifies the land shown in Figure 1 as the sole industrial land in Ku-ring-gai and assigns it a 'Regionally Significant' industrial land classification.



Figure 1: Proposed 'Regionally Significant' industrial land in Ku-ring-gai LGA

Council strongly supports the 'Regionally Significant' industrial land classification for the Pymble Business Park (land currently zoned E3 – Productivity Support and circled in green on Figure 1). However, the land circled red on Figure 1 is zoned E1 Local centres and should not be included in the industrial land categorisation.

Support is provided for the proposed categorisation of the E3 zoned land as given Ku-ring-gai's lack of a deep industrial land bank, the policy's directive to not support residential uses on 'Regionally Significant' land is essential for maintaining the viability of this area.

The identification of only one industrial precinct in Ku-ring-gai highlights a strategic vulnerability for LGAs like Ku-ring-gai. The policy's directive to provide a protective framework for locally significant industrial lands (zones - E3 Productivity Support, E4 General Industrial and E5 Heavy Industrial) but not for locally significant employment lands (E1 Zones of which there are 22 in the Ku-ring-gai LGA) could have unforeseen implications for Ku-ring-gai.

As Ku-ring-gai faces significant population growth—accelerated by recent State housing reforms—the demand for local services (e.g., urban services, light manufacturing, waste transfer stations) will increase. However, employment lands will also come under pressure to convert to apartment living due to high land values.

Council recommends broadening the scope of *Technical Note 2 - Considering Alternative Land Uses* to apply to *all* employment lands (all E – zones). This will provide additional protection against residential encroachment into essential local service lands that lack "industrial" scale but are critical to population growth.

3. Additional Permitted Uses

Technical Note 2 includes a section titled 'Additional permitted uses' (APUs). This section proposes using APU provisions to allow specific parcels of land to be used for additional purposes, provided the proposed use aligns with the zone's objective. In its current form Council is not supportive of this change. Further information on what is meant by the term "align" is required, as, without firm parameters, this change opens the door for proponents to use APUs for 'quasi' spot rezonings that lack strategic merit.

4. Process, Evidence, and Implementation

4.1 Data-Driven Reviews

Council supports the biennial review of categorisations, provided they remain strictly informed by ELDM and ELDP data.

4.2 Review Intervals

To provide market and local government certainty, Council recommends a mandated fixed 5-year review period for the Statewide Policy, aligned with the Regional Plan review cycle.

4.3 Performance Benchmarks

The policy should include 'Success Metrics,' such as a requirement to maintain a minimum 10-year supply of serviced industrial land at all times.

Conclusion

Ku-ring-gai Council is broadly supportive of the draft statewide policy. Our recommendations aim to improve the policy's practical application by ensuring that land classification is directly supported by timely infrastructure delivery, robust climate-resilience standards and measurable deliverables.