



The Sydney Plan

Committee for Sydney
submission

February 2026



Committee
for
Sydney

Executive summary

Sydney's next chapter will be written in how we manage growth. The draft Sydney Plan provides a strong starting point. The opportunity now is to ensure that growth is not measured only in numbers of homes, but in the accessibility of opportunity and the long-term prosperity of our city for future generations.

The NSW Government has been clear that Sydney must not become a city without grandchildren. This plan is the vehicle for that ambition. Its success will be measured by whether it delivers a city that is even better for our grandchildren than it is for us – regardless of family income or postcode.

A city that is better for grandchildren than it is for us is one where people can stay in their communities across every stage of life; where essential and care workers live near those they serve; where children grow up with access to education, parks and opportunity; and where older residents can age in place with dignity. It is a city with well-designed, diverse housing, affordable neighbourhoods, infrastructure delivered early and fairly, and climate resilience that protects those most at risk.

At its core, the Sydney Plan is about how Sydney works, and who it works for. The distance between homes, jobs, schools and services shapes how much time people spend commuting – and how much time remains for family, care and community. When those distances grow, opportunity narrows. Good metropolitan planning shortens those distances and expands access to higher-paid jobs, education and services across the metropolitan area, particularly for households in outer suburbs and for those balancing caring responsibilities.

To realise this vision, the Sydney Plan can be strengthened by:

1. **Anchoring the plan in a clear and strong vision** – establishing a unifying commitment that articulates how future growth should strengthen intergenerational opportunity
2. **Make equity measurable** – by treating 30-minute access to jobs and services as a core performance indicator of whether opportunity is expanding across the metropolitan area
3. **Embedding clear 5, 10 and 20-year targets for housing, jobs and affordable housing** – providing long-term certainty and aligning metropolitan ambition with measurable outcomes
4. **Embedding infrastructure certainty into Sydney's growth strategy** – introducing strong principles, backed by statutory certainty for transparent infrastructure sequencing, land protection and coordinated investment before rezonings occur and land value inflates
5. **Articulating a confident metropolitan economic story** – mapping innovation districts, industrial lands and the future-focused industries to expand access to higher-value jobs across the city
6. **Elevating the blue-green grid as essential metropolitan infrastructure** – working collaboratively with councils and delivery partners to prioritise corridors that protect Sydney's long-term resilience and health
7. **Improving consistency and certainty of affordable housing delivery** – work towards a city-wide policy framework with consistent rules and delivery mechanisms, paired with calibrated contribution rates by precinct
8. **Translating ambition into delivery** – by positioning the Sydney Plan as the spatial anchor across government strategies and strengthening state-local partnership and collaboration.

At its best, the Sydney Plan can do more than accommodate growth. It can reshape the relationship between homes, jobs and infrastructure, increasing housing, reducing unnecessary travel, strengthening access to opportunity, and creating more connected neighbourhoods across the metropolitan area. That is the practical promise of a city for grandchildren.

Introduction

Who we are

The Committee for Sydney is an independent urban policy think tank. We are advocates for the whole of Sydney, focused on developing solutions to the most important problems we face. We are backed by 150+ members representing key business, academic and civic organisations across Sydney.

We advocate for policy and investment outcomes that shape the future of Greater Sydney. We work across six distinct and connected program areas that include resilience, planning, mobility, economy, culture, and equity and fairness.

The review of the draft Sydney Plan intersects with all our policy focus areas – it's critical for better planning and housing outcomes, and also the fairness and equity of our city, its resilience, economy, culture and mobility outcomes.

An overarching vision for the Sydney Plan: A city that is even better for our grandchildren than it is for us

The NSW Government has been clear in its ambition. It does not want Sydney to become a city without grandchildren. It has rightly recognised that when housing is unaffordable, when families are pushed further away from opportunity, and when communities hollow out across generations, the long-term social and economic health of the city is at risk.

The draft Sydney Plan provides an opportunity to give practical effect to that ambition.

The plan sets out a 20-year vision to increase housing supply, strengthen centres, align infrastructure with growth and build resilience. These are necessary foundations. However, the true test of the Sydney Plan is not only how many dwellings are approved or how quickly targets are met; it is whether growth delivers neighbourhoods that work across generations – where children can grow up, families can thrive in well-designed communities, and older residents can age in place with dignity, security and connection.

In other words, the test is whether the Sydney Plan delivers **a city that is even better for our grandchildren than it is for us, no matter their family income or postcode.**

This means a Sydney where:

- People can remain in their communities across life stages, building long-term social connections, rather than being displaced by rising costs
- Essential workers and care workers can afford to live near the communities they serve
- Jobs are accessible within reasonable travel times across the metropolitan area
- Children and young people have good access to quality education
- Open space, sport and community infrastructure are delivered early and equitably
- Climate resilience protects the most vulnerable communities and strengthens long-term health and livability
- Families can access a diverse range of housing types, including apartments, that suit everyday needs, with sufficient space, storage, light and adaptability
- The city reduces daily travel burdens – particularly for carers, most often women – by co-locating housing, schools, care, jobs and transport, enabling time for sport, recreation and community life.

The draft Sydney Plan already contains many of the foundations needed to deliver this outcome, including commitments to housing diversity, compact and walkable urban form, protection of industrial lands, resilience to natural hazards, and closer alignment between growth and infrastructure. Strengthening the alignment between these elements will ensure they operate in balance to support long-term intergenerational stability and opportunity across Greater Sydney.

Our submission focuses on six priority areas where the draft Sydney Plan can be strengthened to maximise its long-term impact. We assess the draft plan against a single question:

Does it set Sydney on a path to becoming a city that is better for our grandchildren than it is for us – or does it risk reinforcing the pressures the government has sought to address?

Connecting the draft Sydney Plan to previous strategic plans for our city

The draft Sydney Plan presents an updated, long-term vision for Sydney, responding to economic, demographic and climate shifts since the metropolitan strategies adopted in 2018 and 2022.

As the city enters its next phase of growth, it is important that the new plan builds clearly and confidently on what has worked, while directly addressing areas where outcomes have fallen short. Strategic continuity – with refinement – will be critical to maintaining momentum and public confidence.

Learning from past plans: reinforce what worked, correct what didn't

The Sydney Plan should explicitly draw lessons from previous metropolitan strategies – reinforcing demonstrated successes and addressing underperformance where targets were not met.

A) Infrastructure-led housing concentration has worked, but there's more to do

Housing supply has broadly tracked toward targets, with population and job growth stronger than originally projected. Importantly, the distribution of housing has resulted in more homes in existing urban areas, or around transport than expected.

The continued prioritisation of development around transport and established centres is therefore welcome. The key question for the next plan is whether ambition should increase as land around new stations becomes more constrained – and how to preserve capacity around future corridors.

Past plans have included a 20-year housing target, which is critical for infrastructure and housing alignment, but the 20-year housing target horizon should not be treated as a ceiling. Strategic land use planning must protect long-term opportunities and maintain momentum beyond a single planning cycle.

B) Employment distribution and access remain Sydney's equity challenge

The previous metropolitan strategy set two important objectives: increase public and active transport mode share, and ensure residents could access key jobs and services within 30 minutes.

The results on mode share were mixed and fell short of ambition, with much of the shift influenced by the shift to working from home rather than structural land use change. More important, however, is that the 30-minute access objective – the more meaningful measure – did not materially improve, and in some areas worsened with more 60+ minute trips in 2024/25 (15%) than in 2014 (13%).¹ The intent of the previous strategy was right: access to opportunity is the true equity test. But without stronger alignment between housing growth, employment distribution and infrastructure investment, the objective was not realised.

Distance and access shape who can participate in higher-paid labour markets, particularly where knowledge-intensive jobs remain concentrated in the Sydney CBD and major centres. When affordable housing is pushed further from these opportunities, spatial and economic inequality deepen and postcode matters more than it should.

¹ TfNSW Household Travel Survey, Greater Sydney

There is also a gender dimension. Women – who undertake a disproportionate share of unpaid care – are more sensitive to commute length and proximity to childcare and schools. Long travel times constrain workforce participation and reinforce inequality.

The lesson for the draft Sydney Plan is not to retreat from the 30-minute ambition – but to double down on it. Travel-time access should be treated as a central performance measure, with stronger job-housing alignment and infrastructure sequencing to deliver on the original intent.

C) Demographic change will intensify demand for family-friendly cities

Previous metropolitan strategies assumed continued growth in lone-person households. In practice, these projections have not materialised, rising marginally from 22.1% in 2011 to 23.2% in 2021.² Housing unaffordability, migration patterns and cultural preferences have contributed to the persistence – and in some cases resurgence – of intergenerational living.

Younger people are forming households later, while longer life expectancy is increasing the number of older residents seeking to remain connected to family and community. Multi-generational households are therefore becoming a more prominent feature of Sydney's housing landscape.

This shift has important implications. Planning cannot rely solely on assumptions of smaller household size. It must respond to evolving living arrangements and plan for both larger and smaller homes – including housing that accommodates grandchildren and grandparents, supports ageing in place, and reflects the diversity of family structures across Sydney, especially if we are to move towards a higher density way of life.

D) Implementation and infrastructure funding reform are critical

Sydney's biggest structural weakness has not been ambition – it has been the failure to consistently integrate land use planning with infrastructure delivery.

In past cycles, rezonings and strategic intent have often moved ahead of funded, sequenced servicing. This has created a gap between *theoretical capacity* and *deliverable supply*. Land has been zoned, uplift has been capitalised, but infrastructure has not followed at the pace required to unlock actual housing and employment outcomes.

The evidence shows this matters. Periods of low *serviced* land supply have corresponded with significant land price escalation across both residential and industrial markets. When supply is zoned but not serviced, scarcity intensifies, land values inflate, and costs ultimately flow through to households and businesses. Capacity on paper does not translate into homes or jobs on the ground.

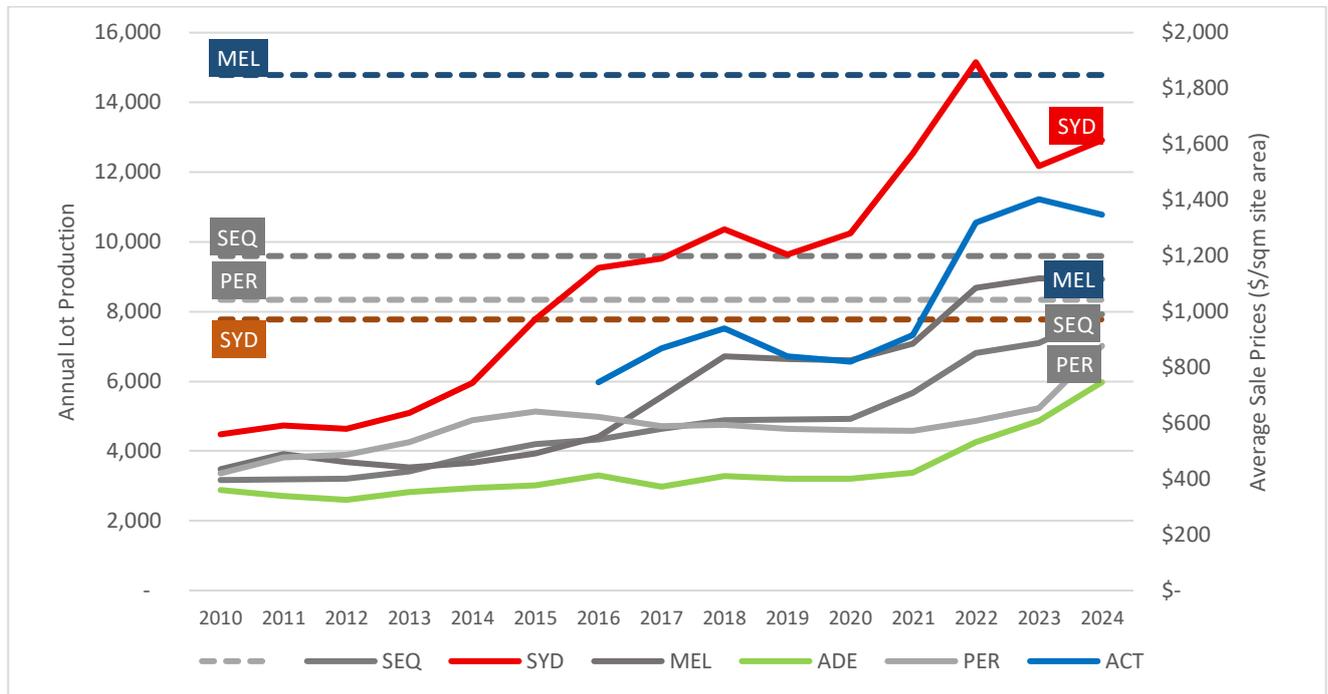
Recent examples in Western Sydney illustrate the risk: precincts planned and rezoned around major infrastructure investments have experienced prolonged delays in servicing, limiting delivery despite strategic intent. These gaps undermine confidence, inflate costs and reduce affordability – precisely the pressures the Sydney Plan seeks to address.

The draft plan acknowledges past infrastructure lags, particularly in greenfield areas. However, it could do more to embed binding sequencing and servicing mechanisms to ensure that land release, infrastructure funding and staging move in step.

Sydney has virtually no zoned serviced land left, resulting in fierce and competitive bidding for land that is zoned and serviced. Combined with enduring demand in Sydney's greenfield precincts, sale prices continue to rise. The lesson from previous strategies is clear: ambition must be matched by credible delivery pathways. A metropolitan

² ABS data, Greater Sydney

strategy that does not align zoning with infrastructure sequencing risks repeating the same structural imbalance – where opportunity is promised, but not realised.



Source: UDIA, Atlas

Figure 1: Relationship between residential serviced land supply and land price escalation in Sydney compared to other capital cities.

What we welcome in the draft Sydney Plan

The draft plan reflects many of these lessons. The reorientation of housing growth towards well-located transport-oriented development sites and established suburbs close to major employment centres is a significant and welcome evolution and responds to many of the access challenges identified above. This shift has the potential to rebalance Sydney's growth pattern, reduce long commutes and improve access to opportunity for future generations.

We also welcome that in the new state hierarchy of plans, Greater Sydney, the Lower Hunter/Central Coast and Illawarra maintain their own plans. It's important to maintain alignment between these plans to reflect the contemporary relationship between Sydney and 'the sandstone megaregion.' Clear guiding principles for how these metropolitan areas connect will remain important, particularly given that a substantial share of residents in these regions commute into the Sydney basin for work, and the planning for High Speed Rail.

We also support:

- The strengthened and more nuanced approach to protecting industrial lands and the importance of considering freight networks in long-term planning
- The clearer recognition of flood risk and evolving climate exposure
- The recognition of different centre typologies.

These refinements demonstrate a maturing strategic framework that is capable of responding to complexity – this offers an opportunity to address further issues through targeted actions as described in the next section of this submission.

What must not be lost

As the draft Sydney Plan evolves, important elements of previous strategies should be preserved.

Earlier metropolitan strategies benefited from strong alignment with the State Infrastructure Strategy and Future Transport Strategy. Ensuring future infrastructure, transport, health, education, innovation, environmental and cultural strategies reflect the spatial logic of the Sydney Plan will be critical to delivering its intent – particularly if travel-time access is to improve.

While district plans are no longer retained, the collaborative ethos they enabled between neighbouring councils should not be lost. Subregional collaboration remains valuable where functional geographies – such as employment catchments, affordable housing delivery and infrastructure coordination – extend beyond LGA boundaries.

Maintaining this alignment and collaborative intent will ensure the Sydney Plan functions as the spatial anchor for broader government policy, rather than as a standalone planning document.

Recommendations

The draft Sydney Plan provides a strong foundation to comment on. We highlight six areas that will strengthen its delivery and long-term impact.

1. Embed infrastructure certainty into Sydney's growth strategy

Sydney's growth must be supported by credible and coordinated infrastructure pathways. Past cycles of rezoning ahead of infrastructure delivery have created service deficits for communities and, in some cases, prematurely inflated land values.

Evidence from the past decade demonstrates this is not simply a perception issue, it is a structural pattern: periods of constrained serviced land supply – both residential and industrial – have coincided with significant land price escalation across Sydney. When infrastructure servicing lags behind rezoning, capacity exists on paper but does not translate into homes or jobs on the ground.

By aligning infrastructure delivery and planning obligations with land use planning, the following can result:

- Land supply is in fact deliverable, not just theoretical
- Land values do not 'run away' – instead they are kept under control
- Land purchase decisions can be made with certainty.

This distinction between 'zoned capacity' and 'serviced, development-ready land' is critical. Land may be theoretically available under planning controls, but without funded and sequenced infrastructure it cannot respond to market demand. The result is artificial scarcity, heightened competition for serviced sites, and upward pressure on prices.

Without clear infrastructure pathways, rezonings can unintentionally accelerate land value uplift before contributions and servicing mechanisms are locked in, weakening affordability outcomes and reducing the effectiveness of value capture tools.

The draft Sydney Plan acknowledges infrastructure challenges, particularly in greenfield and high-growth areas. However, it could do more to articulate the principles and sequencing framework that will guide how infrastructure and growth are aligned over time.

The importance of longer-term housing targets

Longer-term housing targets – at 5, 10 and 20-year horizons – are critical to enable infrastructure providers to plan effectively. Major investments in water, transport, energy, schools and health services cannot be calibrated to short-term or fluctuating supply signals. Infrastructure planning requires certainty, land protection and coordinated staging.

When infrastructure pathways and sequencing are clearly articulated prior to rezoning, governments are better positioned to structure contributions and value-sharing mechanisms before uplift is fully capitalised into land values.

Equally, aligning 5, 10 and 20-year housing signals with corresponding infrastructure delivery windows provides the confidence required for agencies, councils and the private sector to coordinate investment decisions and avoid repeated cycles of stop-start supply.

The opportunity to provide clear principles for complete neighbourhoods

The Sydney Plan is well placed to provide this clarity. This is not about listing individual infrastructure projects. It is about establishing clear principles for how different types of centres should evolve as complete neighbourhoods. When growth is concentrated in strategic centres, particularly around metro and rail stations, there is an opportunity to embed enabling infrastructure early, rather than retrofitting it later at greater cost and complexity.

Embedding sequencing discipline at the centre level would help ensure that transport, schools, health facilities, open space and utilities are treated as integral components of growth, not afterthoughts once population thresholds have already been exceeded.

Many forms of social infrastructure have direct spatial implications, including land reservation, co-location and integration into precinct design. Clear signals at the strategic planning stage improve masterplanning outcomes, increase community confidence and allow agencies and the private sector to align investment decisions.

For example, major transport-oriented development precincts should be planned to support:

- Safe and walkable access to a primary school
- Walkable access to public open space and playable recreational areas
- Access to sports infrastructure proportionate to projected population growth
- A public library or community hub once defined population thresholds are reached
- Childcare integrated within neighbourhood fabric
- Space for primary health services, including GP clinics
- High-quality active transport connections that support walking and cycling.

Importantly, these elements should be sequenced in tandem with housing delivery, rather than being triggered only after deficits emerge. Early land identification and reservation are often the difference between affordable delivery and prohibitively expensive retrofitting.

Embedding these principles in the Sydney Plan would strengthen its role as a guide for infrastructure agencies, councils and state-led rezoning processes.

By clearly linking long-term housing targets to transparent infrastructure sequencing, the Plan can convert theoretical capacity into deliverable supply – strengthening affordability, improving feasibility and restoring confidence that growth will be matched by services.

The opportunity to strengthen serviced land supply through statutory land supply policy

Integrating land use and infrastructure planning is not optional – it is foundational to delivering affordable, serviced growth. Achieving this requires more than coordination; it requires alignment of statutory planning, infrastructure sequencing and capital budgeting.

Other states have embedded this alignment more explicitly within their planning systems. The Victorian Planning Authority and its Precinct Structure Planning process ensure land is not rezoned until servicing strategies, funding arrangements and infrastructure delivery pathways are clearly articulated. This creates greater certainty for government, industry and communities.

Similarly, Queensland and Victoria introduced legislation in 2017 requiring a rolling 15-year supply of land that is both zoned and capable of being serviced. This statutory land supply requirement supports market confidence and helps moderate land price volatility by ensuring a steady pipeline of development-ready land.

By contrast, in NSW, “better coordination” is frequently cited as the solution to integrated outcomes. However, coordination alone cannot overcome misaligned capital budgets or sequencing gaps. Without statutory discipline around serviced land supply, rezoning risks creating nominal capacity rather than development-ready supply. The Sydney Plan provides an opportunity to frame up how the alignment between infrastructure and land can be better aligned.

Key recommended actions

Enable better housing and infrastructure long term planning by:

1. **Introducing longer-term (5, 10 and 20-year) housing targets** to provide certainty for major infrastructure planning.

Flag clear principles for areas with greater housing growth by:

2. Establishing centre-based infrastructure principles, including indicative population thresholds for social infrastructure provision: Within the section outlining the 43-centre network, establish indicative social infrastructure principles and population thresholds for metropolitan, regional and local centres. This could guide expectations for schools, health facilities, libraries, sport and community hubs as centres intensify.
3. Requiring early identification and protection of land for schools, health, open space and sport facilities in strategic growth areas: Within responses relating to housing and centre growth, embed a requirement for early identification and protection of land for schools, health, open space and sport facilities in strategic growth areas and transport-oriented development precincts.

Improve serviced land supply by:

4. **Strengthening the implementation framework to include a transparent infrastructure sequencing plan:** Within the implementation section of the draft Sydney Plan, publish a metropolitan infrastructure sequencing framework that aligns housing targets, centre intensification and major infrastructure investment. This should clarify how infrastructure opportunity plans, transport strategies and growth precincts are staged over time. It could also address out-of-sequence development – i.e. if a proponent pushes for a large-scale development out of the sequencing plan, establishing them as responsible for servicing the land.
5. **Embedding a statutory serviced land supply principle within the Sydney Plan’s implementation framework:** Establish a metropolitan objective requiring a rolling 15-year supply of zoned and serviceable land – land that is not only zoned, but supported by funded and sequenced infrastructure pathways.

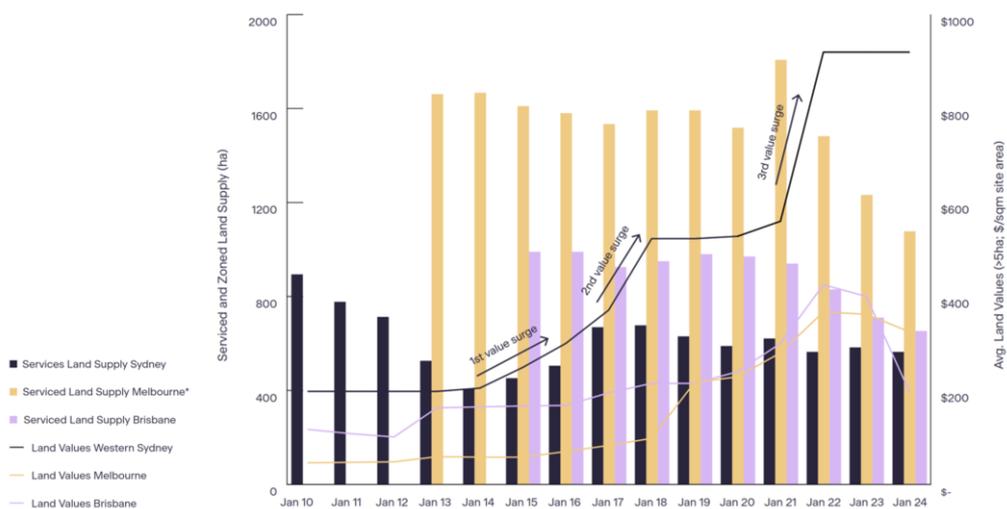
6. **Distinguishing between zoned capacity and serviced capacity in monitoring and reporting:** Within the MERL framework, require regular reporting on development-ready land supply (zoned and serviceable), not solely theoretical capacity.

CASE STUDY: Neighbouring states vs NSW approach:

- In Victoria, the Victorian Planning Authority and Precinct Structure Planning process ensures land is not rezoned until servicing and funding arrangements are in place.
- In NSW, “better coordination” is frequently cited as the solution to integrated outcomes. In our view, coordination is not the issue if agency capital budgets are not aligned.

Queensland and Victoria both introduced legislation in 2017 to require “15 year’s land supply capacity,” i.e. land that is zoned and capable of servicing. This ‘rolling supply’ of land helps keep land values in check. This can be observed in **Error! Reference source not found.** (above) and Figure 2 where prices/land values in Brisbane and Melbourne did not ‘run away’ like they did in Sydney.

The availability of serviced land supply that is plentiful is key to keeping the cost of land under control. If developers are paying ‘top dollar’ for development sites in a fierce bidding war, the prices of completed floorspace will naturally be high. This has far-ranging ramifications for the cost of housing, the cost of doing business and the cost of living.



Source: DPHI, DTP, Knight Frank, CBRE, Atlas

Figure 2: Industrial land, land values and serviced land supply (2010-2024)

2. Plan for ageing in place and family-friendly neighbourhoods as Sydney grows

Sydney’s ability to retain families across generations will depend not only on housing supply, but on whether our neighbourhoods are planned and designed to support people across the full life course.

NSW’s population is ageing rapidly. More residents are living longer, often with complex health and care needs, and increasingly wish to age in place within established communities. At the same time, households are diversifying, multi-generational families are more common, and more children are growing up in mid and high-rise environments. These demographic shifts require deliberate planning responses.

Research in our *Raising Sydney’s Care Factor* report demonstrates that the location and design of housing directly shape how care – paid and unpaid – is delivered. When homes are not adaptable for ageing, unsuitable for

multigenerational households, or disconnected from everyday services, the burden of care intensifies, predominantly on women, with consequences for workforce participation and productivity.

Evidence from Western Sydney Local Health District confirms that family-friendly apartment design, accessible communal space and walkable access to schools, open space and health services are critical not only for child development, but for social connection and healthy ageing.

Equally, access to sport and recreation infrastructure, from local playing fields and courts to indoor facilities and aquatic centres, plays a central role in physical health, mental wellbeing and community cohesion across generations. Sport is one of the primary ways children build confidence and social networks, families connect with their communities, and older residents maintain health and independence.

Despite its importance, there are no references to sport and sporting infrastructure in the draft Sydney Plan. As Sydney grows and densifies, demand for playing fields, courts and community sport facilities will intensify. Without explicit recognition and planning for this infrastructure, access will diminish, particularly in high-growth areas.

Embedding life-course planning within the Sydney Plan will strengthen local planning frameworks and ensure densification supports ageing in place, family stability and long-term wellbeing.

Key recommended actions:

1. Embed ageing in place and family-friendly neighbourhoods as an explicit metropolitan objective, alongside housing supply, within the strategic framework of the plan: Within the 'housed' priority and objective 7 (healthy, resilient and socially connected communities), explicitly position ageing in place and family-supportive neighbourhoods as metropolitan objectives alongside housing supply. This would strengthen the strategic framework and reinforce life-course planning within the plan's long-term horizon.
2. Develop metropolitan precinct planning guidelines that incorporate child-friendly and healthy density principles: Within the implementation actions under the 'housed' and 'prosperous' priorities, commit to preparing metropolitan-level precinct planning guidance that incorporates child-friendly and healthy density principles. This should include:
 - o Walkable access benchmarks to schools, open space, child-care and commercial space suitable for health services (GPs, dentists etc.) in renewal and TOD areas
 - o Minimum expectations for communal outdoor space, including playable space
 - o Design principles that support adaptable housing and ageing in place.
3. **Require intergenerational outcomes in state-led rezonings and TOD precincts:** Within actions relating to Housing Delivery Authority projects, State Significant Development and TOD precincts, require proponents to demonstrate how proposals support multibedroom housing mix, adaptable housing and proximity to social infrastructure.
4. Introduce strategic population and dwelling yield thresholds for centres that trigger planning for social infrastructure, including libraries, childcare, sport and community facilities, to guide precinct plans and infrastructure agencies.
5. **Strengthen alignment between the Sydney Plan and local planning instruments:** Within the implementation framework, clarify how the Sydney Plan will guide Local Strategic Planning Statements and potential DCP or LEP amendments to ensure consistent application of multibedroom mix, adaptable housing and family-friendly design principles in growth areas.

3. Strengthen the plan's economic vision to support jobs today and tomorrow

A city with grandchildren must ensure access to jobs today and tomorrow, and access to services across the metropolitan area.

Access to jobs is central to social mobility, productivity and long-term stability. Where jobs are located, how employment lands are protected and intensified, and how new industries are enabled are fundamentally spatial

questions. The Sydney Plan is well placed to more clearly articulate how land use settings will support both existing employment and the industries of the future. This includes recognising that access to employment is not experienced equally across the city – spatial location, income and caring responsibilities all shape who can participate in the labour market and who cannot.

The draft plan rightly protects industrial lands, reinforces the importance of freight and recognises the value of jobs closer to where people live. These are important foundations. Building on this, the plan can further strengthen its economic narrative by setting out a clearer metropolitan vision for commercial growth, innovation ecosystems and emerging industry clusters. In particular, there is an opportunity to:

- Embed alignment with the NSW Industry Policy, Innovation Blueprint and Trade and Investment Strategy (all released in 2025 and setting out key industries for NSW’s future economy), including formal recognition and mapping of innovation districts (see Figure 3 and Appendix 1)
- Recognise innovation districts, health and education precincts and enterprise areas as strategic economic assets within a more diversified centres hierarchy
- Reflect metropolitan economic geography – including functional subregional catchments and commuting patterns – rather than relying solely on LGA boundaries, particularly if job targets are introduced into the plan
- Address spatial jobs mismatch across the city through measurable access-to-employment benchmarks.

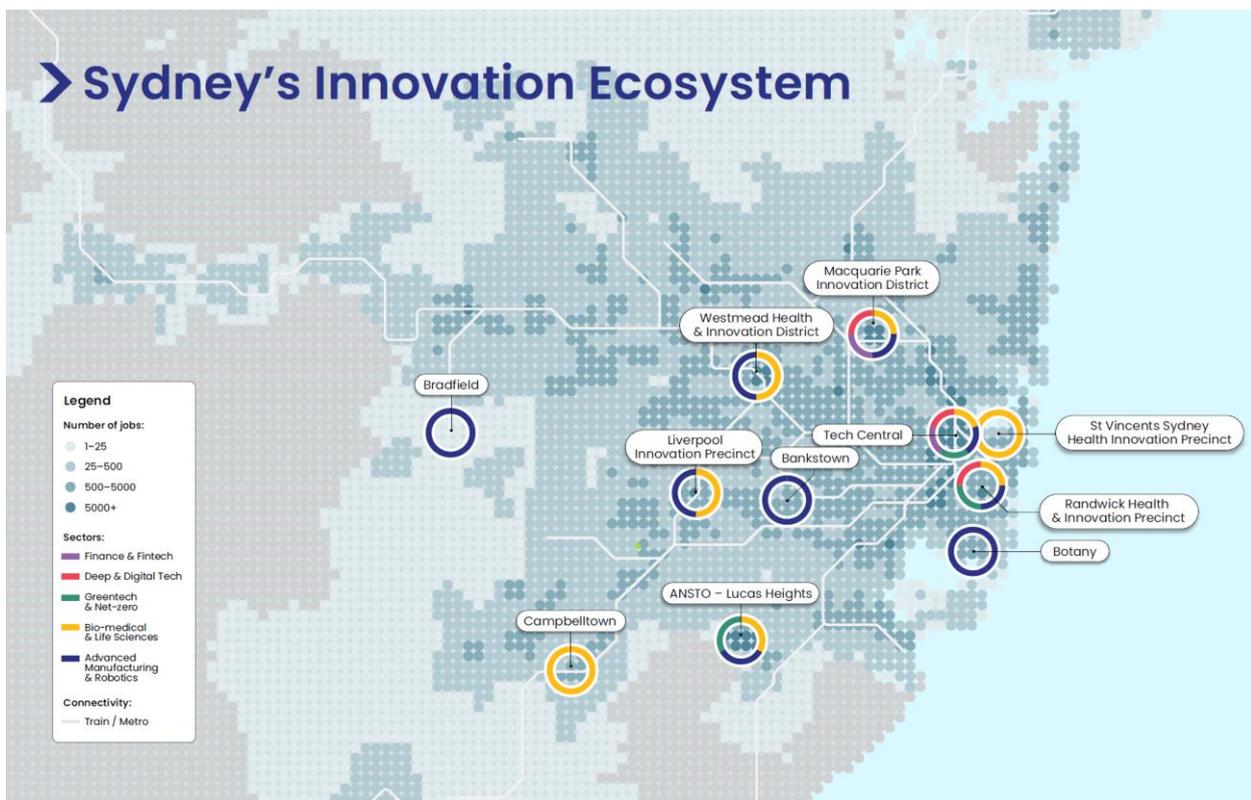


Figure 3: Map of Sydney’s innovation system.

Industrial lands around ports, airport, intermodal terminals and major freight corridors are critical to Sydney’s long-term economic functionality. The plan’s continued focus on protecting and managing these areas is strongly supported.

There is further opportunity to articulate how these precincts support advanced manufacturing, logistics, and future-facing industries, particularly in the context of remnant inner city industrial land pockets, which can play a

vital role in Sydney's innovation economy, but are captured as 'locally significant' in the current hierarchy owing to their size and fragmentation.

Employment growth strategies should also consider job diversity and proximity to childcare, schools and public transport, recognising their influence on labour market participation – ensuring these innovation and industrial jobs can also work for women and primary carers.

Key recommended actions:

1. **Embed a clearer metropolitan economic vision within the 'prosperous' priority:** Include a concise vision statement that reflects the NSW's Government's existing economic priorities and specially defines the complementary roles of:
 - Metropolitan CBDs and major commercial centres
 - Innovation districts, health and education precincts
 - Enterprise areas and economic parks
 - Industrial lands and freight precincts.
2. Strengthen response 4 ('grow well-located jobs') by aligning it more explicitly with the NSW Industry Policy, Innovation Blueprint and Trade and Investment strategies that outline the NSW Government's priority sectors. This could include:
 - Formally recognising innovation districts within the centres framework
 - Identifying precincts critical to the NSW's Government's priority industries, including advanced manufacturing
 - Clarifying how land use settings will protect and grow innovation ecosystems.
3. **Map Sydney's innovation ecosystem.** A proposed innovation ecosystem map is attached in Appendix 1 that could be included in response 4 ('grow well-located jobs') to reflect the economic activity that is occurring outside of the traditional commercial centres of Sydney. This map has been developed by the Committee for Sydney and the Sydney Innovation District Alliance and uses the same base jobs data as other economic maps in the Sydney Plan.
4. **Clarify how the 80/20 employment distribution principle is applied in practice:** within the centres hierarchy and employment sections, provide clearer guidance on how the 80/20 split informs:
 - Commercial zoning and rezoning decisions
 - Floor space expectations within commercial centres
 - The balance between residential uplift and employment retention in mixed-use precincts.
 - Whether it applies at a lot level, on future developments or as an expected outcome at a fixed year in the future as an aspiration
 - Whether councils, through their own land use planning and vision for centres can vary this distribution principle based on their own centre strategies.
5. Strengthen recognition of metropolitan economic geography: Within the centres and economic narrative sections, reflect functional economic catchments that extend beyond LGA boundaries, including innovation corridors, health and education clusters and freight networks. This would better align the plan with real commuting patterns and economic linkages and assist with and assist with future job target allocations.
6. Build on response 8 ('secure an ongoing pipeline of productive industrial lands'): Reinforce industrial lands around ports, airport, intermodal terminals and major freight corridors as foundational economic infrastructure. Articulate how these areas will be protected and strategically intensified to support logistics, advanced manufacturing and future-facing industries.
7. Build on response 8 ('secure an ongoing pipeline of productive industrial lands'): Recognise that industrially-zoned land adjacent to Sydney's innovation districts and clusters of innovation activity are of regional or state importance due to their ability to support R&D commercialisation – particularly associated with the key industries identified in the NSW Industry Policy and Innovation Blueprint.

8. **Add specific land supply expectation to Response 8.** Include a metropolitan-wide target of a certain amount of medium-term serviced industrial land supply to ensure that demand continues to be met. This could take the form of requiring a 15-year pipeline of serviced industrial land, reported on as a headline metric in the annual ELDM.
9. Operationalise access-to-jobs benchmarks: Within the monitoring and implementation framework, embed measurable access-to-employment indicators – such as 30-minute access to major job centres or ‘effective job density’ – to address metropolitan jobs mismatch and support equitable economic participation.
10. Clarify planning settings that enable commercial growth and innovation precincts: Within the implementation actions, specify how precinct planning, state-led rezonings and infrastructure coordination will support:
 - Mixed-use commercial centres
 - Innovation districts
 - Emerging industry clusters.

Embed an employment equity lens within the economic framework by requiring employment and centres strategies to assess sector composition, workforce participation patterns (including gender), and proximity to care infrastructure when allocating and protecting employment lands. Monitoring should include access to higher-paid jobs by geography and workforce participation indicators, ensuring employment growth contributes to reducing spatial and gender inequality.

4. Embed resilience, nature and equity into Sydney’s growth strategy

The draft Sydney Plan demonstrates welcome ambition on resilience. It recognises growing risks associated with heat, flood and bushfire, adopts a risk-based planning approach, and acknowledges the role of biodiversity and environmental health. These commitments are strongly supported.

There is an opportunity to strengthen this framework by embedding equity more explicitly within the resilience agenda.

Climate risk is unevenly distributed across Sydney. Western Sydney and other high-growth areas experience higher heat exposure, lower canopy cover and greater vulnerability to flood and bushfire. A metropolitan resilience strategy – through a Disaster Adaptation Plan mechanism (or similar) – must therefore prioritise vulnerable communities and integrate climate risk, human health and biodiversity into the spatial framework.

Strengthening the blue–green grid

The blue–green grid presents a significant opportunity to integrate flood mitigation, biodiversity, cooling and active transport into a coherent metropolitan system. As Sydney grows and densifies, continuous green corridors — or ‘GreenWays’ — will become essential infrastructure, connecting homes to schools, centres and transport while reducing heat exposure and supporting community health.

There is an opportunity to elevate the blue-green grid from a mapped network to a clearer delivery and prioritisation framework. This includes:

- Linking corridor priorities to growth areas and transport-oriented development precincts
- Positioning the grid as resilience and cooling infrastructure
- Protecting key creekline, rail and underutilised public land corridors early in the planning process
- Strengthening cross-agency coordination between Transport for NSW, Greater Sydney Parklands, Sydney Water and councils.

The draft plan’s Appendix G provides a useful starting point for identifying priority corridors. However, the basis for prioritisation and sequencing is not clearly articulated, and there is an opportunity to strengthen confidence in the framework. A refreshed, consultative review of corridor priorities involving key delivery partners and metropolitan stakeholders would improve transparency, better align priorities with growth and infrastructure investment, and build shared ownership of the blue–green grid as a core metropolitan initiative.

Elevating the blue–green grid in this way would help ensure resilience infrastructure is embedded early in growth areas, rather than retrofitted after development has occurred, and would strengthen the plan’s ability to deliver equitable cooling, biodiversity and access outcomes across the metropolitan area.

Further action on urban heat

The plan’s canopy ambition is positive. However, canopy targets alone will not resolve urban heat exposure – particularly in dense renewal areas and industrial precincts.

A broader urban cooling systems approach is required, incorporating built form, surface treatments, shade, permeability, water-sensitive urban design and protection of mature trees. Achieving canopy targets will also require complementary planning mechanisms that enable greening on private land, not solely reliance on the public domain.

Elevating water security

While flood risk is addressed, drinking water security and drought resilience receive limited attention. Given Sydney’s exposure to prolonged drought cycles, water security should be elevated as a metropolitan planning priority, including catchment protection, recycled water integration and urban water retention.

Key recommended actions:

1. Strengthen blue-green grid corridor prioritisation and coordination: Commit to a collaborative review of corridor priorities with key delivery partners, including Transport for NSW, Greater Sydney Parklands, Sydney Water, councils and metropolitan organisations such as Resilient Sydney and the Committee for Sydney, to improve mapping clarity, sequencing and investment alignment while building shared ownership and cross-boundary buy-in.
2. Embed equity and vulnerability within the ‘resilient’ priority: Explicitly prioritise high-heat, high-growth and high-risk communities – particularly in Western Sydney – within the resilient priority and associated natural hazard responses. Incorporate vulnerability indicators into the monitoring framework so resilience investment is directed to places of greatest need.
3. Develop a metropolitan multi-hazard adaptation framework: Build on the plan’s existing risk-based approach to flood and bushfire by introducing a coordinated framework that integrates heat, flood, bushfire and climate projections into long-term land use planning. This could include strategic climate risk overlays or mapping to guide precinct planning and infrastructure sequencing.
4. Expand canopy commitments into a broader urban cooling strategy: Build on Action 12.3 and related greening commitments by incorporating built environment cooling measures, water-sensitive urban design, shade infrastructure and protection of mature trees – including on private land. Achieving canopy targets will require complementary planning levers beyond the public domain.
5. Elevate the blue-green grid as core resilience infrastructure: Position the blue-green grid within the spatial strategy as essential metropolitan infrastructure – supporting flood mitigation, urban cooling, biodiversity and active transport. Clarify how priority corridors align with growth areas, transport-oriented development precincts and high-heat communities.
6. Embed GreenWay corridors early in precinct and centre planning: Within growth area and centre intensification actions, require early identification and protection of key creekline, rail and underutilised public land corridors to avoid retrofitting resilience infrastructure after development has occurred.
7. Elevate drinking water security and drought planning: Expand the resilient priority to include clearer strategic direction on long-term water security, catchment protection and drought resilience at a metropolitan scale.
8. Integrate human health into resilience monitoring: Within the plan’s monitoring and implementation framework, incorporate health-related resilience indicators – including heat exposure, access to cooling infrastructure and proximity to green space – to reflect the multiple benefits of nature-based solutions.

9. **Unlock Sydney's potential as an urban renewable energy zone** by expanding generation and storage capacity via rooftop solar and batteries to increase equity of access to cheaper energy across all Sydneysiders, enhance energy resilience in the face of increasing extreme weather events, and accelerate Sydney's contribution to NSW's net zero emission targets.

5. Making affordable housing policy frameworks that work for Sydney

The draft Sydney Plan's 'housed' priority recognises that non-market housing must form part of Sydney's future supply and identifies inclusionary zoning, affordable housing contributions and surplus land as key tools. This direction is strongly supported.

We support actions in the draft plan that will require all councils to prepare and adopt an affordable housing contribution scheme, and we support DPHI providing councils with support to achieve this in a timely manner by providing an Affordable Housing Contribution Scheme toolkit.

We also support the action to maximise the affordable housing outcomes delivered under TOD and infill programs by enabling monetary contributions, as well as in-kind.

These are bold and critical steps in the right direction. However, there is an opportunity to further strengthen this framework so that affordable and social housing are treated as structural components of the metropolitan housing system – not residual outcomes within overall supply targets.

Embedding delivery mechanisms

The plan identifies tools such as inclusionary zoning and affordable housing contribution schemes, and recent reforms including transport-oriented development and low and mid-rise housing changes have begun to establish a clearer link between uplift and affordable housing outcomes. This direction is strongly supported. There is now an opportunity to formalise and articulate this principle more clearly at the metropolitan scale.

International experience demonstrates that predictable, upfront affordable housing requirements can operate successfully alongside supply growth. The London Plan, for example, establishes a baseline requirement of 35% affordable housing, increasing to 50% on public and industrial land. These thresholds also apply to build-to-rent, purpose-built student accommodation and housing for older people. New York City similarly applies mandatory affordable housing requirements of up to 50% in areas receiving significant uplift.

The common feature of these models is clarity and consistency: where substantial uplift is granted, affordable housing expectations are known upfront and applied transparently.

The Sydney Plan could embed this logic more explicitly – particularly in high-access, high-opportunity locations and transport-oriented development precincts. By establishing clear metropolitan benchmarks for areas benefiting from uplift, the plan would provide certainty to the market, enable requirements to be factored into land acquisition decisions, and moderate speculative land price escalation over time. Land values would continue to grow, but in a more orderly way, with a defined share of uplift returned to the community through affordable housing.

Clearly defining affordable housing and retaining community benefit

Clarifying the definition of affordable housing within the plan would strengthen consistency and accountability. Aligning with the NSW Affordable Housing Guidelines – including rents capped at 30 per cent of household income for eligible households – would ensure genuine affordability for low- and moderate-income households and maximise the broader economic and social benefits of secure, affordable housing.

Given Sydney's high-cost housing market, embedding a principle of long-term or perpetual retention would help ensure that public value created through planning decisions delivers lasting community benefit.

Establishing evidence-based affordable housing targets

The plan's 20 year horizon creates a valuable opportunity to establish evidence-based metropolitan and regional targets for social and affordable housing. Clear benchmarks would provide certainty to community housing providers, institutional partners and infrastructure agencies, and help ensure affordable housing delivery keeps pace with overall growth.

Embedding these targets within the monitoring framework would reinforce accountability and transparency over time.

Recognising the role of community housing providers

The draft plan does not clearly articulate the role of community housing providers in delivering and managing long-term affordable housing. CHPs are uniquely positioned to leverage public funding, private finance and policy incentives – including planning bonuses and not-for-profit tax settings – to deliver and retain affordable housing at scale. Recognising their role explicitly within the plan would strengthen delivery confidence and pipeline planning for affordable housing. This is particularly important if policy settings change to enable more monetary affordable housing contributions across Sydney.

Measuring net housing growth

Housing targets should be expressed and monitored as net additional dwellings, not gross approvals.

Current reporting frameworks risk overstating supply where redevelopment replaces existing housing with fewer dwellings overall. For example, the Chimes redevelopment results in a 46 net loss of housing, yet it may still be recorded as 34 new dwellings contributing towards the 1.2 million housing target. This inflates apparent progress while reducing overall supply.

To ensure transparency and genuine progress toward metropolitan housing goals, the Sydney Plan's monitoring framework should:

- Report on net dwelling change (new dwellings minus demolitions or lost stock)
- Distinguish between replacement housing and additional housing
- Identify areas where redevelopment is reducing overall housing capacity.

A net-based target provides a more accurate picture of supply, prevents unintended shrinkage of the housing stock, and ensures that strategic growth objectives are genuinely delivering additional homes.

Key recommended actions:

Embed a clear affordable housing metropolitan framework:

1. **Establish clear metropolitan affordable and social housing targets:** Within the 'housed' priority and associated responses, set long-term non-market housing benchmarks aligned with the 20–30-year housing horizon. This will provide certainty for community housing providers, institutional partners and infrastructure agencies.
2. **Align housing uplift with affordable housing capture:** Where state-led rezonings or major uplift increase land value, embed affordable housing requirements upfront so that value capture mechanisms are predictable, transparent and not retrofitted.
3. **Strengthen and standardise inclusionary zoning frameworks:** Build on existing TOD and infill reforms by embedding inclusionary zoning and affordable housing contribution schemes as consistent metropolitan mechanisms, rather than discretionary tools applied variably across locations.

Clearly define affordable housing and protect long-term community benefit:

4. **Define affordable housing clearly and consistently:** Embed a definition aligned with the NSW Affordable Housing Guidelines – including rents capped at 30% of household income for eligible households – to ensure genuine affordability and consistent metropolitan application.
5. **Provide long-term certainty for community housing providers:** Recognise the role of CHPs within the plan and support stable contribution mechanisms and predictable policy settings to enable pipeline planning, land acquisition and financing over a 20-year horizon.

Improve transparency of housing, and affordable housing supply outcomes:

6. **Measure and report net additional housing supply:** Within the MERL framework, require reporting on net dwelling change (new dwellings minus demolitions) and distinguish between replacement and additional housing to ensure accurate measurement of metropolitan supply.

6. Strengthen governance and align long-term strategy with delivery

The draft Sydney Plan demonstrates welcome intent to provide a whole-of-government framework for metropolitan growth. Its long-term horizon and inclusion of an implementation, reporting and evaluation focus, including the MERL framework, are strongly supported.

There is an opportunity to strengthen this governance architecture to ensure long-term strategic intent translates into coordinated delivery.

Metropolitan plans inevitably involve trade-offs between housing and employment, growth and infrastructure, density and open space, resilience and feasibility. The Sydney Plan would benefit from clearer mechanisms to reconcile these competing priorities, and greater clarity around roles, responsibilities and decision-making authority across agencies and local government.

At the same time, the plan presents an opportunity to reset the relationship between state and local government in delivering metropolitan objectives. While strong state leadership is necessary to set ambition, delivery will be most effective where councils are treated as implementation partners rather than solely as recipients of direction.

Local governments hold detailed knowledge of community conditions, infrastructure constraints, local housing markets and economic dynamics. A governance model that better integrates this capability through shared problem definition, co-design of delivery pathways and aligned incentives, would strengthen outcomes and reduce friction in implementation.

Moving from a primarily directive model to a partnership-based approach would not dilute metropolitan ambition. Rather, it would build shared ownership of targets, improve local responsiveness and support more durable delivery across planning cycles.

An evolving plan that serves as a spatial anchor for cross-government strategy

The plan presents a significant opportunity to serve as the spatial anchor for government strategy across portfolios.

Transport, economic development, open space, sport and recreation, climate resilience and social infrastructure strategies all carry important spatial implications. As these strategies evolve, the Sydney Plan can provide the metropolitan lens through which they are translated into place-based outcomes.

Positioning the plan as an adaptive, living framework capable of incorporating emerging government priorities would strengthen its role as the central organising document for metropolitan Sydney. This would ensure that land use planning, infrastructure sequencing and public investment decisions remain aligned over time.

The Department of Planning, Housing and Infrastructure (DPHI), as custodian of the Sydney Plan, is well placed to champion this integration. Through proactive engagement across portfolios, DPHI can position the plan as a place-

based implementation vehicle for cross-government strategies, reinforcing alignment between strategic planning and delivery.

Enabling sub-regional collaboration where it makes sense

Some challenges identified in the Sydney Plan including flood management, economic sub-markets, employment catchments and regional sporting and social infrastructure extend beyond individual local government boundaries. Recognising and enabling appropriate sub-regional coordination mechanisms would support more effective and efficient delivery in areas where the geography of need does not align neatly with LGA boundaries. Encouraging councils to collaborate on shared priorities where functional catchments span multiple LGAs will strengthen implementation while maintaining local accountability.

Key recommended actions:

Strengthen governance clarity and accountability by:

1. **Introducing a clearer framework for reconciling competing priorities:** Articulate how trade-offs between housing supply, employment protection, infrastructure capacity and resilience will be assessed in state-led rezonings, precinct planning and major projects. This will reinforce the primacy of the strategic plan and reduce ad-hoc outcomes.
2. **Strengthening long-term housing and infrastructure alignment:** Embed 5, 10 and 20-year housing signals within the implementation framework to support infrastructure sequencing, land protection and coordinated investment. Infrastructure planning requires longer-term certainty than short-term supply targets.
3. **Strengthening the monitoring framework to measure quality, equity and access:** Broaden MERL indicators beyond housing outputs to include access to jobs and services, infrastructure delivery performance and equity outcomes. Monitoring should demonstrate whether funding and implementation align with the plan's strategic intent.
4. **Reinforce the 20-year strategy over short-term cycles:** Ensure five-year actions are clearly nested within the longer metropolitan vision, maintaining strategic coherence over time.

Enable sub-regional collaboration where appropriate by:

5. **Recognising the need for a certain level of sub-regional coordination.** Consider whether levels of governance above LGA but below metropolitan are required to best address certain issues within the plan, for example, tributary catchments for flood planning, economic sub-markets for job targets or population catchments for sporting and social infrastructure planning.
6. **Supporting voluntary council collaboration:** Enable and encourage councils to collaborate across LGAs where shared challenges require coordinated responses, while maintaining local accountability. For example, river catchments, blue-green grid projects that traverse multiple LGAs, affordable housing catchments, etc.

Position the Sydney Plan as the spatial anchor for cross-government strategy by:

7. **Establishing a formal integration pathway:** Create a mechanism for relevant state strategies (transport, economic development, open space, sport, climate and social infrastructure) to be spatially reflected in future iterations of the Sydney Plan.
8. **Embedding spatial translation requirements:** When new statewide strategies are developed, require agencies to articulate their land use implications and demonstrate alignment with the metropolitan framework. For example, there is an opportunity to better embed existing TfNSW plans – like the Strategic Cycleway Corridors.

9. **Strengthening DPHI's coordination role:** Clarify DPHI's mandate to proactively engage across portfolios and position the Sydney Plan as a shared place-based implementation vehicle for cross-government priorities.

Strengthen the state-local delivery partnership by:

10. Establishing structured state-local implementation forums to support early engagement, sequencing alignment and issue resolution in delivering metropolitan targets.
11. Aligning metropolitan targets with statutory powers and infrastructure funding pathways available to councils, ensuring expectations are matched by delivery tools.
12. Embedding early council engagement in state-led rezonings and precinct planning processes to improve feasibility, local alignment and implementation certainty.

Conclusion

The draft Sydney Plan establishes many of the foundations required to guide Sydney's next phase of growth. It recognises the importance of housing supply, centres, industrial protection and resilience. It adopts a long-term horizon and signals a whole-of-government intent. These are important steps.

The opportunity now is to sharpen and strengthen the Sydney Plan so that its spatial strategy, economic vision, resilience framework and governance architecture operate as a coherent whole.

A city that is even better for our grandchildren than it is for us requires more than housing targets. It requires neighbourhoods that support ageing in place and family life, infrastructure that is sequenced with growth, jobs that are accessible and future-focused, resilience that protects the most vulnerable, and governance structures that align long-term strategy with delivery accountability.

Our submission has sought to strengthen the draft Sydney Plan in six key areas to ensure that growth is not only delivered, but delivered well – with equity, productivity and liveability embedded at its core.

We welcome the opportunity to continue working with government and delivery partners to refine and implement a Sydney Plan that provides clarity, confidence and long-term direction for Greater Sydney.

If you have any questions do not hesitate to contact Estelle Grech, Policy Manager at the Committee for Sydney via estelle@sydney.org.au.

Kind regards,



Eamon Waterford
CEO
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Appendix 1:

