

The Hon. Paul Scully, MP
GPO Box 5341
SYDNEY NSW 2001

25 February 2026

Dear Minister Scully

Thank you for the opportunity to comment on the draft *A New Approach to Strategic Planning: Discussion Paper, The Sydney Plan*, and the *Statewide Industrial Lands Policy*.

[Parks and Leisure Australia](https://parksleisure.com.au/) are a nationally recognised peak industry association that represent 'the people behind the places' - professionals across the public, private and community sectors who plan, design, deliver and manage public open space, recreation and social infrastructure. Our members have reviewed the draft documents through a lens focused on sustaining Sydney and NSW as highly liveable, productive and resilient place, underpinned by strong economic performance, environmental stewardship and social wellbeing.

We support the State Government's intent to simplify the NSW planning system and reduce duplication. Streamlining planning processes has the potential to improve efficiency and certainty. However, we are concerned that the emerging framework creates a growing disconnect between locally led planning—such as LSPs and LEPs—and State-led rezoning and development pathways, particularly those delivered through the Housing Delivery Authority (HDA).

The HDA's encouragement of concurrent rezonings to achieve substantially higher dwelling densities risks outpacing the long-term social infrastructure planning undertaken by local government. Without sufficient, well-planned, well-designed and well-managed social infrastructure—particularly public open space—high-density communities risk becoming increasingly constrained, unhealthy and undesirable. For many residents, public open space functions as their primary "backyard", supporting recreation, social connection and physical activity.

In already constrained and high-cost land markets, significantly increasing residential development makes it extremely difficult to secure additional land for public open space within precincts. While many Transport Oriented Development zones (TOD's) and greenfield growth areas include planned open space, these spaces were designed for far lower dwelling densities than may eventuate. The delivery of new open space within the TODs located in urban infill areas is predominantly subject to 'incentives' to be taken up by existing landowners. This leaves the realisation of these spaces to the market with no certainty they will be delivered for the new community. This puts more pressure on existing spaces which are often already operating at or beyond capacity. This challenge is compounded by developer contributions being capped at rates established decades ago without realistic indexing. This limited funding is then being prioritised towards transport, utilities and other essential infrastructure, leaving social infrastructure and public open space underfunded and unable to meet community need.

Public open space, blue-green and social infrastructure must be informed by infrastructure capacity data and community needs forecasting. It needs to be treated as a required asset class, via appropriate funding. This will enable local government to meet population and economic growth targets while genuinely "creating places where people want to live".

Public open space also plays a critical role in supporting air quality, stormwater management, urban cooling, climate adaptation and disaster risk mitigation. Resilient, healthy and sustainable communities depend on equitable access to public open space of sufficient quantity and quality to meet social, cultural and active recreation needs.

To ensure the needs of both existing and future communities are met, the planning system must include transparent, measurable and enforceable targets or standards for public open space and social infrastructure. These standards should be embedded within planning and assessment frameworks and applied consistently to development proposals. Parks and Leisure Australia would welcome the opportunity to assist the NSW Government in developing such benchmarks.

The following are suggested updates to the Sydney Plan.

Positioning Social Green Infrastructure as Core Infrastructure: as councils transition to LSPS-led planning, parks, sport and recreation infrastructure must be clearly positioned as essential, productivity-enabling infrastructure—alongside housing, employment and transport.

The rationale is that by:

- coordinating the implementation of integrated planning of housing, transport, social infrastructure, public open spaces and “green links” will provide a robust network of environmentally sustainable active transport, ecological cohesion, climate mitigation and amelioration opportunities.
- delivery certainty of integrated development timelines and pathways strengthens alignment between contributions, capital works and infrastructure provision.
- growth management and early provision of needed social green infrastructure reduce retrofit costs and community opposition.

The State should move beyond fixed population-based open space standards and endorse needs-based, equity-focused approaches that consider access, quality, catchments, climate function and social outcomes, while retaining statutory certainty. The benefits of this paradigm shift are:

- improved liveability when density is done well
- greater equity for vulnerable communities
- enhanced climate resilience leading to healthy communities reducing future health care burdens
- clearer implementation and funding pathways

The Statewide Industrial Lands Policy should recognise blue-green infrastructure, active transport and recreation networks as enabling infrastructure that supports productivity, workforce wellbeing, climate resilience and land-use compatibility.

While PLAs overarching comments above are general in nature coming from a need to be succinct, we have a few more direct observations to include from our review. We strongly support the governments stated principle that Country comes first and is foundational to all planning. However, we note a tension between the State’s indicated commitment to caring for Country—supported by frameworks such as Designing with Country—and elements of the draft Plan that

risk undermining these principles in practice. The draft Plan should include actions that explicitly embed co-design with Aboriginal communities and integrate meaningful connections to Country throughout all stages of the planning lifecycle.

The draft Sydney Plan identifies priority corridors and commits to open space targets at the LGA level, supported by programs such as the Metropolitan Greenspace Program and Greening Our City. While these commitments are welcome, the successful delivery of blue-green infrastructure requires long-term planning horizons, sustained funding and genuine collaboration. Projects such as “the Greenway” demonstrates that effective corridor delivery is complex, resource-intensive and cannot be fast-tracked without compromising outcomes.

Response 7.1 seeks “no reduction in existing area of public open space”, which is inconsistent with the stated objective of growing open space. Response 7.1 should be revised to state: “Increase the amount of public open space sufficient to meet the open space access and quantity guidelines recommended in the Greener Places Design Guide.”

Permitting land in Zone RE2 (private recreation) for uses other than active or passive recreation, such as senior housing, does not support the outcome of no loss (or expansion) of open space. The permitted uses for RE2 zoned land should be reviewed to support the intended outcome to protect open space.

Finally, while increased tree canopy is important, it cannot substitute for public open space. Tree planting alone does not deliver the social, recreational or health outcomes provided by accessible, functional open space. Continued trade-offs will ultimately undermine the State’s liveability, resilience and prosperity objectives. Additionally, achieving the targeted 40% canopy target in metropolitan Sydney requires funding and technical support. NSW Government should support local government authorities in achieving tree canopy and resilience targets.

Parks and Leisure NSW/ACT would welcome further involvement in the finalisation of these statewide planning reforms and looks forward to providing any further detailed input as required. We seek to ensure that in NSW we are planning for healthy, resilient and liveable communities into the future.

Yours sincerely,



Simon James

**President NSW/ACT Regional Council
Parks and Leisure Australia**