



Nature Conservation Council
The voice for nature in NSW



Submission on ‘A new approach to strategic planning: Discussion Paper’

27 February 2026

About NCC

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 200 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

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Acknowledgement

The Nature Conservation Council NSW acknowledges that we live and work on the land of First Nations . This land has been cared for since time immemorial by Traditional Owners, whose sovereignty was never ceded. We pay our respects to the Traditional Owners past and present of the many Countries within so-called New South Wales.

We respect the leadership of Traditional Owners in caring for Country, and support the development of treaties that meaningfully empower them to do so. We acknowledge the dispossession of First Nations People and the harm inflicted on people and Country since colonisation began. We acknowledge that colonisation is an unjust and brutal process that continues to impact First Nations people today. As people living and working on First Nations Country it is incumbent on us to play our part in righting the historical and ongoing wrongs of colonisation. Indeed, our vision of a society in which nature and communities thrive together depends upon it.

The Nature Conservation Council of NSW (NCC) respects and supports all First Nations people's right to self-determination as outlined by the UN Declaration of the Rights of Indigenous Peoples (UNDRIP), which extends to recognising the many different First Nations within Australia and the Torres Strait Islands. NCC commits to maintain open lines of communication and to build respectful mutual relationships with First Nations people in all the work we do and wherever possible, seek aligned outcomes with and support the goals of First Nations groups.

We commit, as an organisation, to empower and work together with First Nations people to protect, conserve and restore the land, waters, air, wildlife, climate and culture of the many First Nations people in NSW.

Submission on ‘A new approach to strategic planning: Discussion Paper’

Nature Conservation Council of NSW (‘NCC’) welcomes the opportunity to contribute feedback to ‘A new approach to strategic planning: Discussion Paper’ (‘the Discussion Paper’).

We support the efforts for the Department of Planning, Housing and Infrastructure to create a cohesive strategy that will bring together and clarify planning pathways, increase transparency, and create sustainable and liveable cities, towns and homes.

NCC understands that the planning system is designed to guide development. We believe it must also prioritise maintaining and investing in the natural environment and increasing its resilience to development pressures. It must respond to both known and potential environmental threats, including fragmentation of native vegetation, degradation of rivers and wetlands, climate change, urban sprawl and habitat loss.

In our view, many elements in the framework outlined in the Discussion Paper do not provide a suitable basis for long term strategic planning that is consistent with the principles of ecologically sustainable development (‘ESD’).

Changes to the planning system over past decades have systematically weakened environment protections and avenues for community involvement in planning processes.

Many of our members across our almost 200 member groups throughout the state are concerned about the lack of robust protection for our environment in the planning system and how the development-focused reforms currently being rolled out will exacerbate the decline of nature in NSW.

There are also concerns that the current planning system fails to adequately address key environmental challenges such as biodiversity loss, clearing of native vegetation and habitat, habitat connectivity, access to green space and infrastructure, population planning, air and water pollution, resource and waste management efficiency and impacts of climate change.

The passage of the Environmental Planning and Assessment Amendment (Planning System Reforms) Bill 2025 ('the Planning Reforms Bill') in November 2025 made significant changes to the planning system that risks reducing necessary checks and considerations for projects that could have lasting detrimental impacts on our environment and communities.

[Legal experts have warned](#) that the Planning Reforms Bill also contains heightened corruption risks, eroded transparency and watered down environmental and climate protections.

Changes of particular concern to the planning system in NSW, that NCC believed should be addressed in the strategic planning framework and State Land Use Plan include:

- Weakened consideration requirements for Part 4 Developments by requiring only 'significant' likely impacts be considered;
- Consent authorities are now prohibited from considering "other development", limiting consideration of cumulative and indirect impacts;
- Community input and external oversight is reduced; and
- Powers are removed from specialised agencies and other Government Ministers by centralising power within the Department of Planning.

The most recent 2024 NSW State of the Environment Report showed nature is drastically declining.

[Since its previous 2021 report, it indicated all measures of land, water, air and ecosystems as 'getting worse'](#). The critically endangered animal segment grew by 35 species and the ecological carrying capacity of NSW has been slashed to 29% of its natural level since colonisation.

The Discussion Paper in its current form has very minimal reference to nature, biodiversity or environmental considerations. **If we are to stop biodiversity loss in NSW, planning law cannot be stripped of environmental considerations.** NCC submits that the Discussion Paper and the State Land Use Plan cannot be viewed in a vacuum separate to other Government departments, such as the Department of Climate Change, Energy, the

Environment and Water (DCCEEW). An integrated approach across Government departments is an absolute necessity.

The Discussion Paper currently does not contain any reference to the 2024 '[NSW plan for nature](#)' and the [impending Nature Strategy](#), or how the Planning Department intends to follow and deliver the principles and guidelines set out in these plans. The strategic planning framework should explain how the Department of Planning, House and Infrastructure plans to fulfill the NSW Government's commitment in the 'NSW plan for nature' to front-loading nature and biodiversity considerations in regional planning and ensuring fit-for-purpose biodiversity data requirements for use in strategic land-use planning. It must also be consistent with our national obligations as signatories to the Kunming Montreal Global Biodiversity Framework.

The following sections of NCC's submission are guided by the feedback prompts found in the Discussion Paper.

Feedback Prompt: Purpose of the discussion paper (Page 9)

Does this structure provide an effective basis for guiding strategic land use planning across NSW?

The Discussion Paper does not make any reference to ESD, nor does ESD appear to be operationalised in the proposed framework. ESD should be a core element to the strategic planning framework across NSW.

The [web page for the Discussion Paper on the NSW Government Planning Portal](#) explains that the proposed new framework aims to:

- Reduce duplication across the strategic planning system;
- Align housing, jobs and infrastructure planning;
- Support councils with clearer guidance and direction; and
- Make planning priorities and policies easier to navigate and implement.

The web page also explains that the Discussion Paper forms part of the NSW Government's steps towards a 'more streamlined strategic planning framework'. [The Frequently Asked Questions page on the Planning Portal](#) explain the changes are

‘designed to make planning decisions more consistent, timely and better aligned with infrastructure and investment.’

While NCC understands the goal of creating a consistent statewide framework, it is our submission that the proposed strategic planning framework is singular in focus on development, infrastructure and investment. It does not adequately consider the overlays of land use planning including bush and grass fire, rivers, lakes and water supplies, climate, fisheries, coastal marine ecosystems, erosion and sand processes, food production, grazing or the nuanced and everchanging nature of our environment and biodiversity.

There is no one size fits all, set and forget option that will work for nature across NSW. As the climate continues to rapidly change, and to slow and reverse the extinction of species, the planning system must be able to restore the natural environment, increase the extent of forest cover, and be adaptive to our changing environment. NCC submits that for a structure to provide an effective basis for guiding strategic land use planning across NSW, it must clearly integrate principles of ESD at every step and be flexible enough to adapt to the challenges facing our environment.

Feedback Prompt: Why we need change (Page 21)

What barriers do you encounter in the current framework?

The current planning framework in NSW is fractured, bureaucratic, and fails to prioritise biodiversity and climate. Nature is at best a peripheral consideration, and a paradigm shift towards a nature positive NSW is required for a sustainable future. Land use zoning needs to reflect provisions of natural values including prohibitions on clearing, and requirements for native tree canopy cover where development does occur.

Additionally, the current framework does not adequately address the lack of social and affordable housing in NSW. The housing crisis is driven by investor speculation, vacant homes, and tax paid on the tens of thousands of vacant properties and holiday rentals.

The segmentation of departments in the current planning framework, exacerbated by the changes in the Planning Reforms Bill, means that competing interests, such as addressing the housing shortage and preserving areas of high conservation value, is another significant barrier. Previous attempts by the Government to implement strategic planning that balances

competing interests have failed to resolve issues of land use conflicts and protecting areas of high conservation value, such as the Strategic Regional Land Use Plans.

Key reforms that NCC submit should be integrated into the strategic framework are:

- Non-discretionary quantitative standards for environmental performance
- Flexibility provisions to include clear and unambiguous directions to ensure environmental standards are exceeded and developer loopholes are closed
- An overarching commitment to NSW's net zero targets and clear commitments to achieve this, such as a decarbonisation roadmap leading to full electrification, net zero emissions from energy for all new buildings, bushland retention, urban heat-ready buildings and green space requirements

How could the State Land Use Plan shape or support local planning and decision-making?

NCC believes in the importance of maintaining the role of councils and expert opinions on local places. Elected local councils play an important role in the planning process as councillors are some of the most connected and informed about their local communities and the built and natural local geography. However, over the past decade community input into planning decisions has diminished and the rights of property developers have increased.

By centralising decision-making power and removing regional planning panels, the Planning Reforms Bill has changed the role of local governments. Local government need to remain active players in the decision-making process to shape sustainable strategies for liveability and environmental amenity in their areas.

NCC submits that local governments should have powers to shape and influence the State Land Use Plan, not simply follow the guidelines set by it. Public submissions must remain for all projects, as well as public appeal and review rights for all State Significant Development and State Significant Infrastructure projects.

Feedback Prompt: A stronger framework (Page 30)

Does the proposed structure provide enough clarity on who is responsible for planning and implementation at each tier?

While the proposed structure is clear, NCC is concerned about the current trend of removing expert and independent input from the planning system by centralising decision-making power within the Planning Department. Removing the role of specialised agencies and Ministers heightens corruption risk and limits valuable input in areas of their expertise, especially relating to biodiversity risks.

NCC submits that independent and expert agencies and Ministers' input into planning decisions should remain an integral part of the planning process and given real weight. In particular, DCCEEW should be consulted and their recommendations adopted before the creation of an EPI that would adversely impact threatened species and ecological communities, and critical habitat.

Do the proposed regional planning boundaries make sense for how infrastructure and growth are planned and delivered in your part of NSW?

NCC has serious concerns about the Riverina Murray, North Coast, Upper Hunter, Central West & Orana, New England North West, South East Tablelands and Far West regions being consolidated into a single regional planning boundary.

The environment and communities across NSW are fantastically diverse with specific and unique needs that should be addressed in the planning system. This consolidation risks these areas not receiving the care and consideration that they require to thrive. For example, the needs of the environment and communities in Dubbo where drought threats loom is drastically different to that of Lismore which faces catastrophic flooding events.

NCC submits that these boundaries should be revised with consideration of NSW's 18 bioregions identified by NSW National Parks and Wildlife Service guiding the boundaries.

Feedback Prompt: Statewide priorities: the heart of the framework (Page 33)

Are these priorities the right ones to guide land use planning across NSW?

Of the proposed priorities in the Discussion Paper (Aboriginal Outcomes, Housed, Prosperous, Connected, Resilient, Liveable and Coordinated), nature and biodiversity are only mentioned in one of six.

On page 34 of the discussion paper, Aboriginal outcomes is displayed as an overarching priority that feeds into each of the other six priorities.

It is our submission that considerations of the natural environment should also be an overarching consideration, similarly to how Aboriginal outcomes are presented.

Of the other five Priorities where nature and biodiversity are not mentioned, we submit that these Priorities also require expert assessment of impacts on the natural environment:

- **Housed.** Building new affordable and accessible housing should always consider how the chosen location impacts the natural environment and biodiversity.
- **Prosperous.** Preservation of the natural environment provides for exciting and fulfilling careers and contributions to a prosperous economy and net zero future.
- **Connected.** Transport systems should be planned to ensure they do not encroach on wildlife habitat or corridors, and corridor links and green bridges should be expanded in areas subject to development.
- **Liveable.** Ample green space and access to nature is crucial for quality of life. Ecologically sustainable goals of energy and water efficiency, protection of biodiversity, and clean air and water are critical for prosperous communities and natural environments
- **Coordinated.** Major infrastructure delivery must also support the local environment and account for their impact on the climate and emission targets.

NCC also submits that 'resilience' is not an adequate approach to environmental protection. It is not possible to simply make nature resilient to additional development when it is already in decline. Planning must take proactive steps to restore nature and reduce harm from human pressures on vulnerable natural species and change its focus from exploiting land and its natural resources, to seeing it as a non-renewable resource to be nurtured and restored when development occurs.

Feedback Prompt: A framework designed to adapt (Page 36)

What types of triggers would make updates meaningful?

Measures of how successfully co-existence between human and natural systems is occurring should be a trigger for whether the strategic plan is effective.

It is crucial that measures of biodiversity and environmental protections are integrated into the framework to allow for success rates to be determined and trigger updates when protections are not being met.

Success under the 'Resilience' priority is described to mean 'communities can better withstand hazards and environmental pressures.' While community resilience is essential,

biodiversity protection such as protection of critical habitat and reversed extinction rates must also be a critical success measure.

How can plans remain flexible and responsive?

While we understand that increased flexibility is beneficial in the planning system, it should not result in reduced attention and scrutiny of measures relating to nature and biodiversity. community engagement. Development approval timeframes and rates should not be the primary measure of success in the planning system. Goals of ESD such as clean air and water, resource efficiency and protection of biodiversity should be considered just as important, if not more. Sacrificing the required level of environmental assessment and community impact in the name of increased flexibility will not lead to better planning.

Retaining consultation with other Government departments and authorities on developments that threaten nature is also crucial to ensure plans are responsive to evolving environmental threats and rates of biodiversity loss.

Thank you for the opportunity to make a submission. Your contact person at Nature Conservation Council of NSW is Government Relations Manager, Kashmir Miller kmiller@nature.org.au.

Sincerely,



Jacqui Mumford
Chief Executive Officer
Nature Conservation Council of NSW