

3 June 2026

## Submission on the Proposed Statewide Community Participation Plan

The Nature Conservation Council of NSW (NCC) is the state's leading 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. We acknowledge 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.

NCC welcomes the opportunity to provide the NSW Government feedback on the proposed statewide Community Participation Plan (CPP).

NCC believes that genuine community participation and feedback is crucial to ensure good democratic process in the planning system. We welcome the values and principles expressed in the draft CPP of ensuring communities have a strong voice in the planning system, encouraging planning authorities to consult widely to ensure decisions reflect community values, and ensuring a transparent and fair planning system.

Many of the changes made to the *Environmental Planning and Assessment Act 1979* through the passage of the *Planning System Reforms Act 2025* centralise decision-making within the Department of Planning, Housing and Infrastructure to a few key individuals and bodies. While NCC understands the pressure faced by the NSW Government and the Department of Planning, Housing and Infrastructure to address the housing crisis in NSW, this must not come at the expense of minimising community participation.

While efforts to reduce unnecessary duplication in the planning process to expediate creating new homes are understandable, this draft CPP reduces many avenues of community participation. Expediting the planning system in this way will only lead to bad developments being green-lit and the public being locked out of the decision-making process in favour of big developers and businesses.

**It is our submission that the proposed CCP should not remove or limit existing means of community participation in the planning process.** Please see the following points of particular concern to NCC in the draft CPP.

## **Reduction of the Minimum Consultation Period**

Disappointingly, the draft CPP seeks to reduce the minimum consultation period for multiple types of development applications. In particular, NCC disapproves of the reduction of the minimum consultation period for “higher impact developments” from 28 days to 14.

14 days is not a sufficient timeframe for members of the community, organisations and impacted groups to process the often-lengthy documents included in these development applications and write a considered response. Many community members who wish to contribute to what high impact developments occur in their communities work full-time jobs, have family commitments or other reasons they may not be able to consider these applications in full in a 14 day time period. These crucial voices are already competing with industry professionals who have more resources and expertise to contribute to consultations, and these reductions will only increase the imbalance.

NCC supports the proposed extension of the minimum consultation timeframe on significant state-level strategic planning initiatives from 45 days to 60 days. However, we do not support the removal of the ability for councils to extend exhibition periods for complex or high-impact proposals.

We submit that all public exhibition periods for development applications should be a minimum of 28 days to allow for genuine community engagement, and longer timeframes for more complex development types. Minimum exhibition and community engagement timeframes should also be mandated to ensure consistency across local councils, while giving councils the discretion to extend exhibition periods if they see fit.

In addition, the CPP should contain requirements for planning authorities to continually monitor and improve the quality and effectiveness of public participation processes. These processes should provide opportunities for engagement in both the early and later stages of the planning process.

## **Changes to Master Plan Public Exhibition Requirements**

The draft CPP mentions shortening or removing public exhibition requirements at the planning proposal stage for master plans where consultation has already occurred as part of a recent masterplan or strategic planning update.

Many master plans are not exhibited with proposed planning provisions, and therefore this change would deny community input and revision of specific clauses or provisions in planning instruments used to implement the master plans.

The draft CPP also does not clearly define ‘recent’ or ‘substantive’, leaving this change open for interpretations that unfairly limit community input. We submit that clear criteria should be included that follows the precautionary principle in favour of increased community participation.

## **Developments Exempt from Notification and Public Exhibition**

NCC highly objects to many of the types of developments proposed by the draft CPP to be exempt from notification and public exhibition requirements.

Many of the listed development proposed to be exempt are not low impact and could in fact have substantial environmental and social impacts that would go unchecked, in particular:

- Commercial farms
- Tree removal
- Extensive agriculture
- Farm buildings
- Agritourism
- Industrial retail outlets
- Residential flat buildings
- Shop top housing

Increased agricultural practices and infrastructure, such as extensive agriculture, agritourism, farm buildings and commercial farms, can have significant impact on the local environment through increased chemical runoff, soil degradation, water pollution and other harmful effects.

The draft CPP also includes that changing the intended use of a commercial or industrial development would be exempt from the requirement to notify neighbours. These changes to intended use for these developments could mean significant increases in traffic, noise pollution, reduced parking availability and other social impacts.

Community members are experts in their own local places. Removing community input from these types of development means valuable local insight and knowledge held by community members will be excluded, and the sense trust and ownership felt by locals over their community will erode.

We submit that the list of developments granted exemption from public exhibition be redrafted to only contain genuinely low-impact minor developments.

## **Minimum Environmental Impact**

The draft CPP also includes that developments of 'minimal environmental impact' are exempt from requiring notification or public exhibition, without providing a point of reference or definition for this term.

Approvals of developments of seemingly minimal environmental impact can lead to a death by a thousand cuts for nature. Even seemingly minor reductions in habitat connectivity and wildlife

corridors can have devastating impact on ecological communities by reducing their biological diversity and forcing them to try and relocate, increasing fatalities.

NCC submits that the draft CPP should include a strict criteria for what is considered 'minimum environmental impact' that takes into account the principles of ecologically sustainable development, including:

- Cumulative impacts of development applications
- The precautionary principle
- Conservation of biodiversity and ecological integrity
- Integration of economic, social and environmental considerations

### **State Environmental Planning Policies (SEPP) Exhibition Periods**

The draft CPP states that for the creation of or changes to SEPPs, the draft Explanation of Intended Effects may be exhibited unless decided otherwise due to the urgency, scale or nature of the proposal.

NCC is concerned that this provision leaves the door open for current or future governments to abuse this discretionary approach. 'Urgency, scale or nature of the proposal' is not defined and is broad enough to allow a variety of harmful SEPPs or amendments to existing SEPPs to avoid the requirement of displaying a draft Explanation of Indented Effects.

NCC submits that this discretionary approach should be removed from the CPP, and an Explanation of Indented Effect report should be created and exhibited for all creation of and changes to SEPPs.

Thank you for the opportunity to make a submission. Your contact person at Nature Conservation Council of NSW for any further discussion or questions is Government Relations Manager, Kashmir Miller, at [kmiller@nature.org.au](mailto:kmiller@nature.org.au).

Sincerely,



**Jacqui Mumford**  
**Chief Executive Officer**  
**Nature Conservation Council of NSW**