

BUSINESS PAPER



Penrith Mayor Todd Carney joined Defence Industry Minister Pat Conroy and Cr Hollie McLean at Defence Establishment Orchard Hills for an announcement of two projects worth \$508 million.

Policy and Strategy Committee Meeting

9 February 2026

2 February 2026

Dear Councillor,

In pursuance of the provisions of the Local Government Act, 1993 and the Regulations thereunder, notice is hereby given that a **POLICY AND STRATEGY COMMITTEE MEETING** of Penrith City Council is to be held remotely using audio visual links, video streamed and in the Council Chambers, Civic Centre, 601 High Street, Penrith on Monday 9 February 2026 at 7:00 PM.

Attention is directed to the statement accompanying this notice of the business proposed to be transacted at the meeting.

Yours faithfully

Andrew Moore
General Manager

BUSINESS

1. LEAVE OF ABSENCE

2. APOLOGIES

3. CONFIRMATION OF MINUTES

Policy Review Committee Meeting – 1 December 2025

4. DECLARATIONS OF INTEREST

Pecuniary Interest (The Act requires Councillors who declare a pecuniary interest in an item to leave the meeting during discussion of that item)

Non-Pecuniary Conflict of Interest – Significant and Less than Significant
(The Code of Conduct requires Councillors who declare a significant non-pecuniary conflict of interest in an item to leave the meeting during discussion of that item)

5. MAYORAL MINUTES

6. NOTICES OF MOTION TO RESCIND A RESOLUTION

7. NOTICES OF MOTION

8. DELIVERY PROGRAM REPORTS

9. URGENT BUSINESS

10. CONFIDENTIAL BUSINESS

POLICY AND STRATEGY COMMITTEE MEETING

MONDAY 9 FEBRUARY 2026

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MEETING CALENDAR

CONFIRMATION OF MINUTES

DELIVERY PROGRAM REPORTS

WEBCASTING NOTICE

Please note that tonight's meeting other than the confidential sessions are being recorded and will be placed on Council's website. All in attendance should refrain from making defamatory statements. Council takes all care when maintaining privacy, however members of the public gallery and those addressing Council should be aware that you may be recorded.



2026 MEETING CALENDAR

January 2026 - December 2026

(Adopted by Council – 8 December 2025)

	TIME	JAN	FEB	MAR	APRIL	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC
		Mon	Mon	Mon	Mon	Mon	Mon	Mon	Mon	Mon	Mon	Mon	Mon
Ordinary Council Meeting	7:00pm		2 23@	23	20 -	25 #	29*	27	24@	28^	26✓	30∞#+	14
Policy & Strategy Committee	7:00pm		9	9>	13	11	1	13	10	14	12	9	7

- Meeting at which the draft corporate planning documents (Delivery Program and Operational Plan) are endorsed for exhibition
 - * Meeting at which the draft corporate planning documents (Delivery Program and Operational Plan) are adopted
 - # Meetings at which the Operational Plan quarterly reviews (March and September) are presented
 - @ Meetings at which the Delivery Program progress reports (including the Operational Plan quarterly reviews for December and June) are presented
 - ^ Election of Mayor and/or Deputy Mayor
 - ✓ Meeting at which the 2025-26 Financial Statements are signed and referred to auditors
 - ∞ Meeting at which the 2025-26 Financial Statements are presented
 - + Meeting at which the Annual Report is presented
 - > To consider Budget, draft fees & charges and corporate document
 - Δ
- Extraordinary Meetings are held as required.
 - Members of the public are invited to observe meetings of the Council (Ordinary and Policy & Strategy Committee).
 - Should you wish to address Council, please contact the Head of Governance, Adam Beggs on 4732 7597.

**UNCONFIRMED MINUTES
OF THE POLICY REVIEW COMMITTEE MEETING OF PENRITH CITY COUNCIL HELD
REMOTELY USING AUDIO VISUAL LINKS, AUDIO STREAMED ON THE COUNCIL WEBSITE
AND IN THE PASSADENA ROOM, PENRITH
ON MONDAY 1 DECEMBER 2025 AT 7:00 PM**

WEBCASTING STATEMENT

His Worship the Mayor, Councillor Todd Carney read a statement advising that Council Meetings are recorded and webcast.

PRESENT – IN PERSON

His Worship the Mayor, Councillor Todd Carney, Deputy Mayor, Councillor Garion Thain and Councillors Kirstie Boerst, Robin Cook, Sue Day, Ross Fowler OAM, Glenn Gardiner, Sabbie Kaur, Edwin Mifsud, Reece Nuttall, Vanessa Pollak, Faithe Skinner and John Thain.

APOLOGIES

20 RESOLVED on the MOTION of Councillor Garion Thain seconded Councillor Ross Fowler OAM that the apologies received from Councillor Libby Austin and Councillor Hollie McLean be accepted.

CONFIRMATION OF MINUTES - Policy Review Committee Meeting - 13 October 2025

21 RESOLVED on the MOTION of Councillor Reece Nuttall seconded Councillor Garion Thain that the minutes of the Policy Review Committee Meeting of 13 October 2025 be confirmed.

DECLARATIONS OF INTEREST

Councillor Sue Day declared a Non-Pecuniary Conflict of Interest – Less than Significant in *Item 2 - Children's Services Cooperative*, as she is on the Children's Services Cooperative Board as Council's representative. Councillor Sue Day stated that she would leave the meeting during consideration of this item and would not take part in voting or discussion on this item.

Councillor Kirstie Boerst declared a Non-Pecuniary Conflict of Interest – Less than Significant in *Item 1 - PP&VA Annual Report 2024-25 and update*, as she is on the Penrith Performing and Visual Arts Board as Council's representative. Councillor Kirstie Boerst stated that she would leave the meeting during consideration of this item and would not take part in voting or discussion on this item.

Councillor Robin Cook declared a Non-Pecuniary Conflict of Interest – Significant in *Item 1 - PP&VA Annual Report 2024-25 and update*, as she is on the Penrith Performing and Visual Arts Board as Council's representative. Councillor Robin Cook stated that she would leave the meeting during consideration of this item and would not take part in voting or discussion on this item.

Councillor Ross Fowler OAM declared a Non-Pecuniary Conflict of Interest – Significant in *Item 1 - PP&VA Annual Report 2024-25 and update*, as he is on the Penrith Performing and Visual Arts Board as Council's representative. Councillor Ross Fowler OAM stated that he would leave the meeting during consideration of this item and would not take part in voting or discussion on this item.

Councillor Ross Fowler OAM declared a Non-Pecuniary Conflict of Interest – Significant in *Item 2 - Children's Services Cooperative*, as he is on the Children's Services Cooperative Board as Council's representative. Councillor Ross Fowler OAM stated that he would leave the meeting during consideration of this item and would not take part in voting or discussion on this item.

Councillor Vanessa Pollak declared a Non-Pecuniary Conflict of Interest – Significant in *Item 2 - Children's Services Cooperative*, as she is on the Children's Services Cooperative Board as Council's representative. Councillor Vanessa Pollak stated that she would leave the meeting during consideration of this item and would not take part in voting or discussion on this item.

DELIVERY PROGRAM REPORTS

Having previously declared a Non-Pecuniary Conflict of Interest – Less than Significant in Item 1, Councillors Robin Cook, Kirstie Boerst and Ross Fowler OAM left the meeting, the time being 7:03pm.

STRATEGIC DIRECTION 2 - SUPPORT OUR WELLBEING

1 PP&VA Annual Report 2024-25 and update

22 RESOLVED on the MOTION of Councillor John Thain seconded Councillor Reece Nuttall

That:

1. The information contained in the report on PP&VA Annual Report 2024-25 and update be received.
2. Council continues to underwrite the operations of Penrith Performing and Visual Arts Ltd up to the presentation of their 2027-28 Annual Report.

Councillors Robin Cook and Kirstie Boerst returned to the meeting, the time being 7:30pm.

Having previously declared a Non-Pecuniary Conflict of Interest – Less than Significant in Item 2, Councillors Vanessa Pollak and Sue Day left the meeting, the time being 7:31pm.

2 Children's Services Cooperative

23 RESOLVED on the MOTION of Councillor Garion Thain seconded Councillor Reece Nuttall

That:

1. The information contained in the report on Penrith City Council Children's Services Cooperative Ltd be received.
2. Council underwrites the operations of the Penrith City Council Children's Services Cooperative Ltd until the presentation to Council of the Penrith City Children's Services Cooperative Ltd Annual Report for 2025-26.

Councillors Vanessa Pollak, Sue Day and Ross Fowler OAM returned to the meeting, the time being 7:49pm.

There being no further business the Chairperson declared the meeting closed the time being 7:50pm.

DELIVERY PROGRAM REPORTS

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STRATEGIC DIRECTION 3 - SHAPE OUR GROWING CITY

- 1 [Draft submission in response to the NSW Government's Draft Sydney Plan, New Approach to Strategic Planning Discussion Paper and draft Statewide Industrial Lands Policy](#)

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STRATEGIC DIRECTION 3 - SHAPE OUR GROWING CITY

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1 Draft submission in response to the NSW Government's Draft Sydney Plan, New Approach to Strategic Planning Discussion Paper and draft Statewide Industrial Lands Policy

Compiled by: Fiona McDermott, City Strategy Lead
Elizabeth Hanlon, Executive Planner - City Strategy
Marianna Kucic, Executive Planner - Urban Strategy
Megan Whittaker, Strategic Advocacy Manager

Authorised by: Carlie Ryan, Head of City Strategy
Kylie Powell, Director Futures and Strategy

Outcome	<i>Shape our growing city</i>
Strategy	<i>Harness opportunities to boost liveability through advocacy and collaboration</i>
Principal Activity	<i>Advocate for and influence state planning policies and legislation to ensure the best results for our city and community</i>

Executive Summary

This report seeks Council's consideration of a draft submission, attached, to the NSW Government in response to strategic planning documents currently on public exhibition: the draft Sydney Plan, New Approach to Strategic Planning Discussion Paper and draft Statewide Industrial Lands Policy. In particular, the draft Sydney Plan which has a 20 year horizon aims to replace the Greater Sydney Region Plan, the Metropolis of Three Cities from 2018, by giving direction on where future homes and jobs should be located and aligning growth with infrastructure. Meanwhile, the draft Statewide Industrial Lands Policy is designed to protect and better manage industrial land.

A summary of the draft submission will be presented to Councillors for consideration at the Committee meeting. Council staff have prepared the attached submission in line with existing Council strategies and plans such as the Local Housing Strategy, Advocacy Strategy, Employment Lands Strategy, St Marys Town Centre Master Plan and Local Strategic Planning Statement (LSPS). The submission reinforces Council's commitment to sustainable well managed urban growth, community involvement in planning, timely infrastructure delivery and balanced flood planning. Council is already largely consistent with the new strategic planning approach put forward by the NSW Government, meaning that it is unlikely to result in major changes to how Council currently plans its City.

The submission is generally supportive of the intention of the approach to strategic planning, and actions outlined in the draft Sydney Plan noting strong alignment with Council's own strategies and plans to improve liveability, productivity and resilience. The submission highlights the challenge of funding the critical infrastructure and facilities required to meet the needs of a growing city and notes Council will be required to implement key actions and reviews of planning instruments within the next five years.

While supportive, the submission notes the draft plan in its current form is extremely high level and would benefit from further detail to guide future land use planning and investment sequencing, particularly for significant sites in Penrith LGA. The submission also notes that major transport commitments and infrastructure priorities critical to the prosperity of Western Sydney, including city shaping commitments under the Western Sydney City Deal like delivering full length north -south rail, are not clearly reflected in the draft Plan.

In addition, Council emphasises the importance of resolving key policy settings that directly influence Penrith LGA growth outcomes, including the need for a coordinated, and evidence-based approach to flood planning in the Penrith City Centre, to provide certainty for renewal, investment and employment growth.

Council's submission therefore calls for ongoing consultation with councils and the community as the draft Plan is finalised, recognising that changes to strategic planning policy can significantly shape how people live, work and move across Sydney. Council is committed to working collaboratively with the NSW Government to develop plans and policies that are fit for purpose and deliver on Council's Community Strategic Plan and LSPS.

This report recommends that the submission at Attachment 1 be endorsed by Council and forwarded to the NSW Government for consideration before the closing date for submissions, 27 February 2026. The Parks (the Western Parkland Councils) will also prepare a joint submission in the context of the Western Parkland City, which will be shared with Councillors via memorandum once finalised. Councillors will continue to be updated on matters relating to new State and Region Plans as more information becomes available.

Background

On 10 December 2025, the NSW Government released three key documents for public exhibition on the NSW Planning Portal, with submissions closing on 27 February 2026. The three documents are part of the Government's broader planning reforms, which aim to simplify the planning system and respond to housing and economic challenges. The new strategic framework proposes a three-tier hierarchy comprising a State Land Use Plan (not yet released), regional plans (the first being the draft Sydney Plan) and local plans. Under this approach, district plans are not proposed to continue as a separate tier.

The exhibition documents include:

- **Draft Sydney Plan:** A 20-year vision for land use across 33 local government areas, covering housing, jobs, infrastructure, sustainability and future growth. Once finalised, it will become the statutory regional plan for Sydney, replacing the 2018 Metropolis of Three Cities plan. The current district plans, including the Western City District Plan for our LGA, will be made redundant.
- **Technical appendices:** A series of appendices to the Sydney Plan that contain technical information and guidance for councils, practitioners and others to support implementation – including flood planning principles, guidance on investment in open space, employment guidance for centres, greenfield rezoning principles, and mapping of the draft urban footprint. The appendices are intended to provide the NSW Government with a modular structure that allows components to be updated quickly, without full document revisions.
- **A New Approach to Strategic Planning Discussion Paper:** The Paper outlines a simplified strategic framework for land use across NSW. It provides a glimpse into what we may expect from the upcoming State Land Use Plan, but the State Land Use Plan has not yet been released.
- **Draft Statewide Policy for Industrial Lands:** The Policy sets out a new approach to securing, managing and monitoring industrial land supply across NSW. The Policy, together with the draft Sydney Plan, seek to categorise all industrial land as having either State, Regional or Local Significance.

The draft Sydney Plan and future State Land Use Plan are framed around 7 broad priorities for the metropolitan area – being Aboriginal Outcomes, Housed, Prosperous, Connected, Resilient, Liveable and Coordinated. Securing an ongoing pipeline of productive industrial lands – creating jobs, investment, and innovation while supporting housing construction.

These high-order priorities are reflective of previous metropolitan and region plans, and long-standing NSW Government policy in general. These goals are also largely reflected in Council's own CSP and LSPS. As such, Council's submission proposes general support for the exhibition material.

Of the exhibited materials, the draft Sydney Plan and its Technical Appendices are anticipated to have the most significant impact upon how Council plans for growth and develops its planning instruments. The draft Sydney Plan outlines 22 actions for councils and 35 actions for the NSW Government over a 5-year implementation timeframe. Some of the actions for Council include reviewing local plans to reflect housing targets, providing for affordable housing, updating LSPSs, and reviewing contributions plans to ensure these provide for essential infrastructure and are fit-for-purpose. Council is well-placed to meet the draft Sydney Plan actions and work is already underway or programmed in respect to several of the actions.

The 5-year housing targets referenced in the draft Sydney Plan are those that were released in May 2024 and therefore have already been informing Council work programs in recent times. The housing target for Penrith LGA is for 8,400 new dwellings to be delivered between 2024 and 2029. Penrith has a significant pipeline of housing and considerable capacity within its existing and master planned residential and mixed use zones to respond to this target. Council is already progressing a significant amount of work providing for housing growth in our LGA – in particular, plans implementing the St Marys Town Centre Master Plan are ready to be made, and Council's Local Housing Strategy has demonstrated that there is theoretical capacity for up to 32,000 dwellings (within zoned and future master planned precincts), including in Glenmore Park Stage 3, Orchard Hills North, Sydney Science Park, and the Penrith City Centre should the dwelling cap be lifted. There is potential for around 20,000 new dwellings under existing zoned capacity.

Current Situation

Council is already largely consistent with the new strategic planning approach put forward by the NSW Government, meaning that it is unlikely to result in major changes to how Council currently plans its City. Most of the actions in the draft Sydney Plan reflect the continuation of NSW Government policy that has been developing for a number of years – such as encouraging more councils to have in place affordable housing contribution schemes, and encouraging the densification of established neighbourhoods by enabling more dual occupancies. Across the exhibited documents, some of the notable changes and implications for Penrith LGA are as follows:

- A new categorisation of centres: It is proposed to categorise centres into the four-tiers of 'CBD', 'Commercial Centre', 'Retail Centre' and 'Residential Centre'. The only 'CBDs' under the Sydney Plan are proposed to be Sydney CBD, Greater Parramatta and Bradfield. The next tier are 'Commercial Centres' – including Greater Penrith, and the likes of Liverpool, Campbelltown, Blacktown and Norwest. St Marys Town Centre is our only 'Retail Centre' – along with centres like Marsden Park, Katoomba, Rouse Hill, Richmond-Windsor, Fairfield and Narellan.
- A new categorisation of industrial lands: It is proposed to categorise industrial land into 'state', 'regional' and 'local' significance. Within our LGA, only the Mamre Road

Industrial Precinct is nominated as state significant. Most of our industrial estates are proposed as regionally significant, while some smaller pockets of industrial land are locally significant.

- Removal of District Plans: The new approach proposes a three-tiered set of plans - State Land Use Plan, Sydney Plan (i.e. the region plan), and local plans. This moves away from the previous “six cities” concept that identified Western Sydney as its own “city” (i.e. the Western Parkland City).
- Five-year implementation timeframe: While the draft Sydney Plan provides a 20-year vision, its land use planning actions have a 5-year timeframe. Councils are responsible for 22 of these actions. The Plan states that actions will be updated periodically.

Council officers have prepared a submission at Attachment 1. The submission reinforces Council’s commitment to sustainable well managed urban growth, community involvement in planning, timely infrastructure delivery and balanced flood planning.

The key matters raised in the submission are summarised as follows:

- The actions for the NSW Government within the draft Sydney Plan tend to relate to the writing of new policies or guidelines and fall under the direct remit of the Department of Planning, Housing and Infrastructure (DPHI). The submission welcomes a more **coordinated, whole of government approach in the future to support the Plan’s implementation** and ensure planning priorities are met for Sydney – such as coordinating with other agencies for the direct investment in and delivery of public transport and social housing, the funding and delivery of regionally significant infrastructure, or the servicing of critical employment land.
- The submission calls on the NSW Government to work with Council to **resolve flood planning and evacuation issues currently over Penrith City Centre**, so that planning can progress for more housing and jobs growth within this existing centre, supported by transport and infrastructure. Resolving flood planning levels and evacuation routes for Penrith City Centre and removing the Penrith City Centre residential dwelling cap (enabled by updated flood policy) are the steps needed to move planning forward. The submission also seeks clarification in respect to the Penrith City Centre’s omission from the High Growth Housing Capacity Map within the draft Sydney Plan and the opportunity to meet with the NSW Government to further discuss the growth expectations for Penrith.
- Council is well placed to deliver housing growth for our LGA. To support housing growth, **Federal and State Government investment is required for the timely delivery of infrastructure and facilities** that are beyond Council’s control or capacity. The submission calls on the NSW Government to work with all councils on the timely provision of infrastructure – especially quality roads, public transport, and community facilities.
- Requesting that the **NSW Government work closely with all councils to enable them to implement the Sydney Plan actions and undertake planning reviews in accordance with Council led timeframes**. Council’s work programs have already anticipated many of these actions and Council is well-placed to meet them. Given there is no additional resourcing offered, we are calling on the NSW Government to allow each council to undertake the necessary work in accordance with timeframes

that suit each council - reflecting their existing works programs, capacities and deep understanding of local issues and priorities.

- Ensuring that **the relationship of the State Land Use Plan and Sydney Plan to our Community Strategic Plan is two-way** - to ensure the needs of local communities are appropriately considered and valued within the planning process. The submission asks that this reciprocal, 'top-down' and 'bottom-up' approach be reflected in any language used to describe the relationship of the new plans to CSPs.
- The draft Sydney Plan makes **no reference to Health and Education Precincts**. This is a departure from the previous metropolitan region and district plans that recognised Greater Penrith (i.e. The Quarter) as being a Health and Education Precinct. The submission asks for the continued recognition of Health and Education Precincts, especially given Council's structure planning for Kingswood-Werrington is underway to strengthen the synergies between the hospitals, tertiary institutions and industry in that precinct.
- Council's submission takes the **opportunity to advocate for a number of priorities important to support the projected growth of the City** aligned with Council's Advocacy Strategy 2025, such as the need for delivery of a full-length Sydney Metro line from Tallawong in the north to Macarthur in the south, progression of a masterplan and funding for Penrith Lakes, the planning and opening of Fernhill Estate for greater community use, and delivering the Castlereagh Connection as an additional regional evacuation route.
- The draft Sydney Plan **proposes a draft 'Urban Footprint', signalling where urban expansion will be contained** and where rural areas will be safeguarded to allow for productive uses. The exhibited material indicates that more work will be done by the NSW Government in developing this mapping. In the meantime, Council's submission calls for this mapping to reflect Council's Rural Lands Strategy (RLS), Local Housing Strategy (LHS) and associated work, which were developed through extensive community consultation.
- The structure of the draft Sydney Plan **relies heavily on spatial mapping**. For example, the maps depict areas of employment land, industrial land, high growth residential capacity, and open space. Our submission recommends several corrections or adjustments to the mapping.
- Several clarifications or potential refinements are suggested in our submission in relation to the **series of technical appendices** being exhibited. For instance, Council has recommended clarifications and greater detail in respect to the flood planning principles. The exhibition material explains that the appendices are intended to provide the NSW Government with a modular structure that allows components to be updated separately and quickly, without full document revisions. Our submission conveys the importance of updates being separately exhibited and submissions being considered to support engagement and input from community and stakeholders.
- The exhibition material includes a Discussion Paper outlining the NSW Government's New Approach to Strategic Planning. This Paper references the development and **future release of a 'State Land Use Plan' without much detail as to specific content or expected timing**. As such, the submission recommends that the State Land Use Plan be separately exhibited for comment once developed.

- The draft Statewide Policy for Industrial Lands proposes to **categorise all industrial land as having either local, regional or state significance**. Council's submission asks for further clarity in respect to the different categorisations and what this may mean for the control, planning and infrastructure funding of industrial precincts.
- Council's submission also raises **general questions, suggestions, corrections and clarifications** in respect to aspects of the exhibited material. For example, seeking the definition of specific terms used in the flood planning principles.

Across all of these matters, Council's submission calls for ongoing consultation with councils and the community, particularly as changes in strategic planning policy have the potential to significantly impact the way people live, work and move about our city every day. The submission commits to working closely with the NSW Government to develop plans and policies that are fit for purpose and deliver on Council's CSP and LSPS commitments.

Financial Implications

There are no direct financial implications for Council associated with making this submission. More generally, the submission calls for funding by the Federal and State Government toward critical infrastructure and facilities to meet the needs of our growing population.

Risk Implications

If Council does not provide a submission to this consultation, the risk is that Council's concerns and comments will not be fully understood and considered in the Government's development of the new State Land Use Plan, Region Plan and associated policies which will guide planning for Sydney over the next 20 years.

Conclusion

Council's submission on the NSW Government's draft Sydney Plan, New Approach to Strategic Planning Discussion Paper, and Statewide Industrial Lands Policy supports the intention of the proposed documents and makes comments to strengthen the proposed new planning approach and outcomes that reflect the context and opportunities in Penrith and Western Sydney. Council is already largely consistent with the new strategic planning approach put forward by the NSW Government, meaning that it is unlikely to result in major changes to how Council currently plans its City.

The submission raises the opportunity for more detail in the Sydney plan to inform future land use planning and that a whole of government approach will be required for successful implementation. We raise concerns regarding the housing growth attributed to the Penrith City Centre and that resolving flood planning and evacuation issues and the Penrith City Centre dwelling cap is critical so planning can progress. The submission also calls on the NSW Government to work with all councils on the timely provision of infrastructure, ensuring appropriately funded and sequenced infrastructure delivery. Further it asks the NSW Government to work closely with all councils to allow each to implement the actions and undertake planning reviews in accordance with timeframes that suit each council. Of key importance, Council's submission calls for ongoing consultation with councils and the community, particularly as changes in strategic planning policy have the potential to significantly impact the way people live, work and move about our city every day. The submission commits to working closely with the NSW Government to develop plans and policies that are fit for purpose and deliver on Council's CSP and LSPS commitments.

It is recommended that Council endorse the submission at Attachment 1. Should Council endorse the submission, it will be submitted to the NSW Government by 27 February 2026.

Councillors will continue to be updated on matters relating to new State and Region Plans as more information becomes available.

RECOMMENDATION

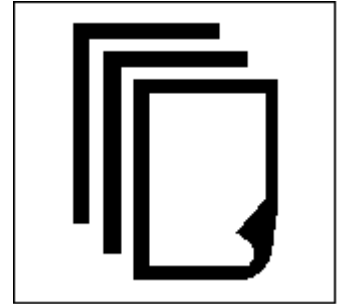
That:

1. The information contained in the report on Draft submission in response to the NSW Government's Draft Sydney Plan, New Approach to Strategic Planning Discussion Paper and draft Statewide Industrial Lands Policy be received.
2. Council endorse the submission at Attachment 1 for submission to the NSW Government's Department of Planning, Housing and Infrastructure (DPHI) by the closing date on 27 February 2026.

**ATTACHMENTS/APPENDICES**

1. Submission - Draft Sydney Plan and Strategic Planning Approach	33 Pages	Attachments Included
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ATTACHMENTS



Date of Meeting: Monday 9 February 2026

Report Title: Draft submission in response to the NSW Government's Draft Sydney Plan, New Approach to Strategic Planning Discussion Paper and draft Statewide Industrial Lands Policy

Attachments: Submission - Draft Sydney Plan and Strategic Planning Approach



Council feedback on the draft Sydney Plan, A New Approach to Strategic Planning Discussion Paper, and draft Statewide Policy for Industrial Lands

February 2026

Penrith City Council welcomes the opportunity to provide feedback on the draft Sydney Plan, Strategic Planning Discussion Paper and draft Statewide Policy for Industrial Lands released in December 2025. This is a pivotal moment for NSW and Sydney, with Western Sydney emerging as a key economic driver for the State and the nation. Located at the heart of this transformation, Penrith LGA's future is closely tied to the unprecedented infrastructure investment and accelerated planning activity currently underway.

Council embraces the opportunities presented by Sydney's growth and is well positioned to respond. With a strong housing pipeline and well-advanced, evidence-based strategic and city-shaping plans in place, Penrith is prepared to capitalise on growth in a way that aligns with and gives effect to the directions of the draft Sydney Plan. Council's commitment and capability in strategic planning is demonstrated through recently endorsed initiatives such as the St Marys Town Centre Master Plan and associated planning documents.

Council supports the intent of the proposed strategic planning framework to deliver diverse and affordable housing, a prosperous economy and connected communities, while also promoting liveability, resilience and caring for Country. We look forward to working collaboratively with the NSW Government as new plans and policies are developed and contributing to the vision of success for Sydney as outlined in this proposed suite of work.

The comments that follow outline Council's recommendations to strengthen the proposed planning approach, plans and actions to better reflect the opportunities and challenges facing Penrith and Western Sydney. Council looks forward to continuing to work collaboratively with the NSW Government as these plans and policies evolve and to contributing to the successful delivery of Sydney's long-term vision.

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EXECUTIVE SUMMARY

The effectiveness of a metropolitan plan rests on the clarity of its long-term vision and the certainty with which it sets out how growth will be delivered over time. While the draft Sydney Plan provides a useful foundation, in its current form it lacks the level of strategic clarity required to guide land use planning and investment decisions over the next 20 years. In particular, clearer direction is needed on roles, sequencing, enabling infrastructure and implementation pathways to support coordinated delivery at the regional and district level.

Successful implementation of the Sydney Plan will depend on a genuine whole-of-government approach that integrates land use planning with infrastructure delivery and sustained funding commitments across budget cycles. Without this coordination, opportunities for joined-up planning, efficient infrastructure provision and value-for-money outcomes will be constrained.

Supporting Penrith LGA to realise its full potential is central to achieving the objectives of the Sydney Plan and maximising the once-in-a-generation investment occurring in Western Sydney. Council's priority is unlocking growth in Penrith City Centre. The omission of the City Centre from the High Growth Capacity Housing Areas map, combined with unresolved flood planning, evacuation constraints and the long-standing residential dwelling cap, is limiting housing and jobs growth in an established centre that is already supported by transport and infrastructure and located just 15 kilometres from the Western Sydney International Airport. Resolving these matters is critical to delivering the Plan's housing, employment and productivity objectives.

Greater clarity is also required on the proposed centres hierarchy, particularly the implications of Bradfield's designation as an emerging CBD for the role, growth expectations and investment priorities of other established Western Sydney centres, including Penrith, Liverpool and Campbelltown. While Council supports the use of land-use ranges to preserve employment capacity, these settings must be evidence-based and supported by clear government direction, particularly where constraints such as flood evacuation affect development outcomes.

Sustained State and Federal investment in enabling infrastructure will be essential to support Western Sydney's growth and economic role. Continued delivery of public, active and freight transport infrastructure, including the full north-south rail, Western Sydney Rapid Bus network and staged delivery of the Western Sydney Freight Line, is critical to improving connectivity, reducing inequality and maximising the benefits of the Western Sydney International Airport. These commitments require stronger and more explicit reflection in the Sydney Plan to provide confidence in delivery.

The draft Sydney Plan would also benefit from stronger direction on matters fundamental to liveability, resilience and long-term sustainability, including arts and culture, protection of built and natural heritage, open space and community infrastructure provision, urban heat, biodiversity, waterway health and environmental protection.

Council is well placed to support implementation of the Sydney Plan, with a strong evidence base and strategic planning program already underway. However, councils have limited resourcing and delivery capacity. In the absence of additional support, successful implementation will require a collaborative approach with flexibility to align actions with Council-led timeframes and existing work programs.

Summary of key recommendations/asks of Government

- **Adopt a coordinated, whole-of-government approach** to Sydney Plan implementation that aligns land use planning with infrastructure investment, servicing and delivery.
- **Commit to long-term infrastructure funding and delivery**, including clear timelines for the full north-south rail, Western Sydney Rapid Bus network and Western Sydney Freight Line.
- **Work collaboratively with Council to unlock growth in Penrith City Centre** by resolving flood planning, evacuation constraints and removing the residential dwelling cap.
- **Amend the Sydney Plan to reflect the housing growth potential of Penrith City Centre**, including updating the High Growth Capacity Housing Areas map.
- **Provide clearer centres policy direction**, including evidence-based land-use expectations and clarity on the role of established Western Sydney centres alongside Bradfield.
- **Recognise councils' role, capacity and timeframes** in implementing Sydney Plan actions, with flexibility and collaboration where additional resourcing is not provided.
- **Clarify the relationship between the Sydney Plan, State Land Use Plan and Community Strategic Plans**, recognising the two-way role of CSPs and committing to meaningful council and community engagement.

COMMENTS ON THE DRAFT SYDNEY PLAN

The following comments identify the priority matters to be addressed to ensure the Sydney Plan supports Penrith LGA's full potential and delivers outcomes aligned with the metropolitan vision. Council's specific responses to the proposed actions for councils are included in **Appendix 1**.

HOUSING

Pipeline of future housing

Key Issues and opportunities:

Penrith has a strong pipeline of housing and is committed to delivering homes that meet the needs of a growing community while supporting Sydney's expansion. Achieving this requires clear and consistent guidance to councils on housing targets, feasibility and the monitoring of housing delivery, to ensure new housing is delivered in the right locations and supported by jobs and infrastructure.

Key recommendations/asks of Government:

- **Further guidance on feasibility and the pipeline of potential homes**

Clearer guidance is sought on how "feasible" housing supply is to be defined and assessed in the context of Action 1.4 of the draft Sydney Plan (p.44), which requires councils to plan for the feasible number of homes rather than theoretical capacity. If feasibility is intended to relate to infrastructure servicing timeframes, councils currently have limited visibility of delivery programs from utility providers. If it relates to development feasibility, key inputs including construction costs, labour availability, financing and holding costs are subject to rapid and unpredictable change.

Further clarification is also sought on the expectation for councils to plan for a "significantly larger" pipeline of potential homes. Councils have limited ability to influence private sector development take-up, and decisions to bring sites forward for development are influenced by a range of factors beyond servicing and feasibility, including market conditions, risk appetite and land-banking. Clearer guidance acknowledging these factors would support more realistic and deliverable housing planning.

Policy Directions

Key Issues and Opportunities:

Council has well-established, evidence-based strategic city-shaping and land use planning frameworks and review processes in place. Council understands the opportunities and challenges for Penrith and for Sydney arising from the once-in-a-generation change occurring across Western Sydney. Growth is welcomed, and NSW Government support is sought to enable Council to progress its strategic planning work program in a way that responds to the needs of the city, its communities and its critical planning challenges.

Key recommendations/asks of Government:

- **Review of dual occupancy controls**

A collaborative approach with the NSW Government is sought to review dual occupancy development standards under Action 2.1 of the draft Sydney Plan, which aims to establish a consistent approach across NSW. The related requirement under Action 2.8 for councils to review minimum lot size controls for dual occupancies outside low- and mid-rise housing areas is also noted. While there is potential for duplication, the work required under Action 2.8 is expected to assist in responding to the outcomes of Action 2.1 by supporting an appropriate, place-based approach, particularly within Penrith's rural villages.

Council welcomes the opportunity to work with the NSW Government on this review and notes that a review of dual occupancy controls is already scheduled as part of Council's forthcoming LEP and DCP review program.

Affordable Rental Housing

Key Issues and Opportunities:

Council has demonstrated a strong commitment to increasing the supply of affordable rental housing through the development of an Affordable Housing Contributions Scheme (AHCS). Clarity is sought on how the proposed actions in the draft Sydney Plan will align with and support Council's existing scheme and affordable housing programs.

Key recommendations/asks of Government:

- **Target affordable housing delivery on State Government-owned land**

While the draft Sydney Plan includes affordable housing targets within Transit Oriented Development (TOD) areas (p.49), it does not establish corresponding targets or expectations for the delivery of social and affordable housing on State Government-owned land. Greater leadership in this area would support more equitable housing outcomes and help accelerate delivery in well-located areas with access to transport and services.

EMPLOYMENT/INDUSTRIAL LANDS

Key Issues and Opportunities:

Council has long held the position that housing growth must be supported by local job generation, enabling residents to work closer to home and strengthening economic resilience. Council has established clear employment targets through its Economic Development Strategy and supports the draft Sydney Plan's emphasis on growing jobs and diversifying the economy across Western Sydney.

Greater clarity is required on the categorisation of industrial land as having local, regional or state significance under the draft Statewide Industrial Lands Policy, including the implications for planning controls, infrastructure servicing and funding responsibilities across industrial precincts.

Key recommendations/asks of Government:

- **Rebalance jobs growth across Western Sydney**

Active collaboration is sought to rebalance jobs growth across a broader range of industries and locations in Western Sydney, consistent with the objectives of the draft Sydney Plan (p.27). This includes encouraging investment attraction beyond the Aerotropolis, relocating government jobs to established Western Sydney centres, prioritising servicing of zoned industrial land, and supporting the relocation of cultural assets and institutions to strengthen local economies and job diversity.

- **Ongoing recognition of Health and Education Precincts**

Health and Education Precincts should continue to be recognised in the Sydney Plan and associated NSW Government documents. Previous regional and district plans identified Penrith as a Health and Education Precinct (The Quarter), however, this designation is not referenced in the exhibited materials. Council's structure planning for the Kingswood–Werrington corridor continues to recognise The Quarter as a critical precinct that brings together hospitals, tertiary education institutions and related industries to drive innovation, job creation and access to world-class services.

- **Consistency and clarity of mapping**

Updates are sought to ensure mapping across the Sydney Plan and supporting documents is consistent, or that clear explanations are provided where differences occur. Identified inconsistencies are detailed in Appendix 2 of this submission and should be addressed to improve clarity and confidence in the Plan as a strategic framework.

- **Improved job guidance in LGA snapshots**

The LGA snapshots in Appendix E of the draft Sydney Plan would be more effective if they provided job growth guidance for the entire LGA, rather than only major centres. A whole-of-LGA job range would better reflect the dispersed nature of employment across Penrith. Removal of duplicated sub-regional or UDP job ranges on individual LGA snapshot pages is also sought. These changes would better align with Council's Economic Development Strategy, which targets 23,000 new local jobs by 2031 and a long-term goal of a 1:1 jobs-to-workers ratio by 2041.

- **Clearer strategic direction for key employment and industrial sites**

More consistent recognition is sought for strategically important employment and industrial sites, including the Multi-User Depot at Penrith and the Western Sydney University Werrington North and South campuses. These locations have significant potential to accommodate employment-generating uses, including higher-density and knowledge-based jobs, in close proximity to housing, transport and infrastructure. Inconsistent representation of these sites currently reduces the Plan's effectiveness in guiding land use planning and infrastructure sequencing.

Council's structure planning for the Kingswood–Werrington corridor aligns with the draft Sydney Plan's objective to grow well-located jobs (Action 4.4) and may also inform Action 8.4 relating to the identification of new industrial land. This area is critical to achieving the 1:1 jobs target in our Employment Lands Strategy.

- **Coordinated infrastructure delivery and land servicing**

A coordinated approach across NSW Government agencies to infrastructure delivery and land servicing is critical to supporting employment land development. The growth of the

Mamre Road Industrial Precinct demonstrates strong market demand; however, achieving employment targets depends on timely coordination of enabling infrastructure, particularly Sydney Water servicing and road upgrades.

- **Clarification of industrial land intensification actions**

Further clarification is sought on the meaning of “interventions” in Action 8.1, including how these relate to council-led actions under Actions 8.7 and 8.8. Clearer articulation of roles, responsibilities and implementation pathways would support more effective delivery.

- **Greater clarity on industrial land categorisations**

Clearer guidance is needed on industrial land categorisations under the draft Statewide Industrial Lands Policy, including their implications for planning controls and the benefits or consequences of changing land categories. Clarification is also sought on how councils may review and amend land categorisations over time, as referenced in section 3.5 of the draft Policy.

- **Transitioning of locally significant industrial land**

Any transition of locally significant industrial land should give due regard to Council-endorsed employment lands strategies and long-term employment needs. While place-based, evidence-led planning is supported, there is concern that locally significant industrial land could transition too readily to non-employment uses, undermining the Policy’s objective to secure industrial land supply. Decisions on alternative land uses should be made at a precinct scale and align with Council’s broader strategic planning work, including the St Marys Town Centre Master Plan and the Kingswood–Werrington Structure Plan.

INFRASTRUCTURE/CONTRIBUTIONS

Key Issues and Opportunities:

Development contributions and planning agreements are critical mechanisms for funding the local infrastructure and services required to support growth, including parks, community facilities, roads and stormwater. It is important these mechanisms remain fit for purpose, enabling infrastructure to be delivered consistently, transparently, and at the time and place it is needed to service growing communities.

Key recommendations/asks of Government:

- **Review the status of community facilities in Essential Works List**

While the draft Sydney Plan (p.53) recognises the importance of considering community facilities early in land use planning, the Essential Works List does not currently permit contributions to fund the construction of community buildings such as libraries, childcare centres and cultural facilities. Reviewing this aspect of the Essential Works List—either through Action 5.2 or a new action—would better enable councils to meet community infrastructure needs as populations grow.

- **Clarify the implications Action 5.5 for infrastructure schedule reviews**

Greater clarity is required on how the requirement for councils to review infrastructure schedules at least every two years under Action 5.5 will operate in practice. State-led

planning reforms, including transport-oriented development precincts and low- and mid-rise housing initiatives, can be unpredictable and may result in misalignment between land use planning outcomes and contributions plans.

Further guidance is also needed on how infrastructure schedule reviews will align with the IPART review process, noting that IPART determinations can take up to two years to complete. Clarification is sought on how reviews would be managed where updated costings exceed the \$30,000 per dwelling cap, and how feasibility testing is intended to be incorporated. While the intent of Action 5.5 is supported, these practical implementation issues warrant further consideration.

- **Expand Action 5.2 to enable holistic infrastructure contributions reforms**

Expanding Action 5.2 beyond best-practice guidance to consider broader reform of the local infrastructure contributions system would support more efficient and coordinated infrastructure delivery. A holistic review of the end-to-end contributions process, including plan preparation, cost setting, approvals and delivery would assist councils in aligning infrastructure provision with population growth in a financially sustainable and streamlined manner.

Such reforms could build on NSW Government work undertaken in 2021, including consideration of alternative contribution mechanisms, clearer definitions of essential infrastructure and benchmarking of local infrastructure costs, and be undertaken collaboratively with councils, the Independent Pricing and Regulatory Tribunal and the NSW Productivity Commission.

USE OF UDP AND ELDP

Key Issues and Opportunities:

Council supports clear and consistent guidance to councils on housing targets, employment lands and the monitoring of housing and job delivery. Improved data sharing is also strongly supported to enable robust, evidence-based and place-based planning at the local level.

Key recommendations/asks of Government:

- **Clarify the use of UDP and ELDP for local-scale infrastructure planning**

Clearer guidance is needed on how councils are expected to use Urban Development Program (UDP) and Employment Lands Development Program (ELDP) data to inform local-scale infrastructure planning, as referenced in Action 5.3 (p.53). While the UDP and ELDP are valuable tools for coordinating state and regional infrastructure delivery, staging land release and prioritising investment across LGAs, they represent only one input into the preparation of local infrastructure contributions plans.

In their current form, the UDP and ELDP have limited utility for detailed local infrastructure planning. The UDP dashboard forecasts housing supply over a short three- to four-year horizon and reports data at a whole-of-LGA scale, which does not align with the 15–20 year timeframe or locality-specific focus of most contributions plans. As a result, councils must rely on additional datasets, specialist modelling tools

and external consultants, often at significant cost, to undertake robust infrastructure planning.

It is therefore recommended that Action 5.3 be deleted and replaced with an action requiring the NSW Government to develop a practical toolkit that clearly explains how councils should use UDP and ELDP data alongside other inputs to inform local infrastructure planning.

- **Clarify expectations for monitoring local housing delivery**

Clear guidance is also needed on how councils are expected to monitor local housing delivery using the revised housing dashboard. Following the announcement on 12 December 2025 that the Greater Sydney UDP Dashboard would be replaced, the newly released Housing Supply Dashboard provides less information than its predecessor. In particular, it no longer includes Net Dwelling Completions data by LGA, does not spatially map available data, and removes access to LGA-level sales and rental price information.

Clarification is sought on how councils are expected to use the revised dashboard to inform Local Housing Strategies and monitor housing delivery at a local level in the absence of dwelling completions and spatially disaggregated data. Without this clarity, councils' ability to effectively track housing performance and respond to delivery challenges will be significantly constrained.

CENTRES

Key Issues and Opportunities:

A clear hierarchy of urban centres provides an important framework for distributing jobs, housing, services and infrastructure across Sydney, supporting more coordinated land use planning and investment decisions.

Council's Local Strategic Planning Statement (LSPS) identifies Penrith City Centre as the primary metropolitan centre for the LGA, with St Marys Town Centre as a complementary strategic centre. Each plays a distinct but interconnected role in supporting employment, services and population growth. Strengthening both centres, together with improving transport connections and supporting other centres between them, is essential to achieving a balanced and well-connected city. It is therefore critical that the centres hierarchy adopted in the Sydney Plan appropriately reflects the relative role and positioning of Penrith and St Marys, both in relation to each other and to centres in other LGAs.

The draft Sydney Plan proposes to classify Penrith City Centre as a Commercial Centre with a 70/30 employment-to-residential land use range. The use of land use ranges for centre typologies is supported in principle, as it assists in preserving land for employment and other non-residential uses. However, the basis for determining appropriate land use ranges for individual centres is not clearly articulated and should be informed by robust evidence reflecting each centre's function, constraints and strategic role.

The Plan also elevates Bradfield as a CBD within Western Sydney, while identifying Penrith, Liverpool and Campbelltown as Commercial Centres. Further clarity is required on how

this hierarchy will be applied in practice and what it means for growth expectations and investment priorities across established centres.

Key recommendations/asks of Government:

- **Amend the nomenclature used to categorise centres**

The current categorisation of centres (p.29) as 'Commercial Centre' and 'Retail Centre' does not clearly convey a hierarchy and may create confusion, particularly given the use of 'Commercial' terminology within existing zoning frameworks. Alternative nomenclature drawn from the draft definitions such as 'Specialised Centre' and 'Service-Oriented Centre' or the adoption of a tiered or numbered hierarchy (e.g. Tier 2 or Level 2 Centre) would provide greater clarity.

In the exhibited draft Plan, Penrith City Centre is classified as a Commercial Centre, while St Marys Town Centre is classified as a Retail Centre. Further consultation with councils on the proposed naming conventions of 'Commercial', 'Retail' and 'Residential' Centres would assist in better reflecting the nuance, function and relative position of centres within the hierarchy.

- **Support appropriate locations for entertainment precincts**

Council supports Action 6.3 (p.55), which enables councils to establish special entertainment precincts as part of Council-led precinct planning, and which aligns with the Penrith and St Marys 24-Hour Economy Strategy endorsed in 2025.

While the concept of vibrant neighbourhoods with mixed uses and diverse housing types, including family-friendly apartments (Action 2.3), is supported, entertainment precincts are most appropriately located in commercial or tourist-oriented areas. Locating these precincts in already active or underutilised commercial areas, and buffering them from sensitive residential uses, will help minimise land use conflict. Built forms such as hotels, rather than apartments, are generally better suited to accommodating a range of adaptive uses and managing amenity impacts.

- **Clarify growth expectations for established Western Sydney centres**

Clearer guidance is sought on the growth roles, expectations and investment priorities for the established Western Sydney centres of Penrith, Liverpool and Campbelltown, particularly in light of the elevated status of Bradfield as a CBD. Greater clarity would support more coordinated planning, improved investment certainty and stronger alignment across government.

OPEN SPACE

Key Issues and Opportunities:

A well-connected, high-quality open space network is fundamental to supporting recreation, health and liveability as Penrith grows. Protecting and enhancing parks, green corridors and riverfront areas, and ensuring new development is supported by accessible and diverse open spaces, is essential to achieving sustainable growth and strong community outcomes.

Key recommendations/asks of Government:

- **Increase public access to Fernhill Estate and Penrith Lakes**

The identification of Fernhill Estate in the draft Sydney Plan (Figures 28, 30 and 39) is supported; however, significant investment is required for the Estate to function as usable public open space that delivers meaningful community benefit. Longstanding advocacy has highlighted the need for NSW Government funding to finalise the Conservation Management Plan and prepare a comprehensive Landscape Master Plan to guide activation and increased public use of this important community asset. Commitment is also required to identify long-term funding mechanisms for the ongoing management, improvement and activation of Fernhill Estate.

The recognition of Penrith Lakes as a key opportunity for metropolitan-scale open space (p.56) is also welcomed. A commitment is sought to fund a comprehensive vision and master planning process for Penrith Lakes, with Council directly involved to advocate for increased community access and to realise tourism, recreation, economic and social opportunities. Funding is also sought to enable the permanent use of Penrith Beach for swimming and recreational purposes.

- **Clarify and refine open space mapping**

Appendix F of the draft Sydney Plan defines open space as including RE1, C2 and C3 zoned land, as well as some regional parks and parklands (p.3). The inclusion of C3 zoned land is not supported, as much of this land comprises privately owned rural land in the Mulgoa Valley and Wallacia and does not function as accessible public open space.

Further clarification is required regarding the open space provision mapping in Appendix F (p.4), which indicates only 1–2 hectares of open space per 1,000 people in 2045 for the Jordan Springs, Ropes Crossing and Llandilo areas. This appears inconsistent given the proximity of significant National Parks and Wildlife Service land, including Wianamatta Regional Park, Wianamatta Nature Reserve, Castlereagh Nature Reserve and Yiraaldiya National Park.

- **Correct creek and corridor mapping**

Appendix G incorrectly identifies the Eastern Creek Corridor and Thompsons Creek as being located within Penrith LGA (p.9). These references should be corrected and Penrith removed from the mapped corridors.

NATURAL HAZARDS/FLOODING

Key Issues and Opportunities:

Supporting Penrith LGA to realise its full potential aligns with the directions of the draft Sydney Plan and is critical to maximising the once-in-a-generation investment occurring in Western Sydney. Central to this is resolving the flood planning and evacuation constraints affecting Penrith City Centre, to enable housing and jobs growth within an established centre that is already supported by transport and infrastructure and located just 15 kilometres from the Western Sydney International Airport.

Finalising flood planning levels, removing the residential dwelling cap (enabled through updated flood policy), and providing clarity on evacuation capacity are essential steps to

unlocking this growth. While the draft Sydney Plan classifies Penrith City Centre as a Commercial Centre with a 70/30 employment-to-residential land use range, progress in planning for commercial growth is constrained by unresolved evacuation limitations. Clear direction and support from the NSW Government is required to enable Council to advance strategic planning with confidence.

It is also noted that Penrith City Centre has not been identified as a residential high-growth area in the draft Sydney Plan. Further explanation is sought regarding the basis for this position, alongside opportunities for strategic engagement to ensure the role and potential of Penrith's centres are fully recognised in delivering outcomes for Western Sydney.

Key recommendations/asks of Government:

- **Include Penrith City Centre as a high-growth housing area and resolve flood and evacuation constraints**

Penrith City Centre has been omitted from the High Growth Housing Capacity Map (Figure 33, p.47), with no clear justification provided. While the Minister's Foreword refers to avoiding development in flood-prone areas, Penrith City Centre has exceptional potential to accommodate housing, jobs and a vibrant city experience, subject to a bespoke and evidence-based flood planning solution.

Longstanding advocacy by Council has sought urgent action to:

- Finalise flood planning levels and flood policy for Penrith LGA and Penrith City Centre
- Review and update flood evacuation modelling using a balanced, risk-based and merit-based approach
- Remove the Penrith City Centre residential dwelling cap to enable growth in an existing, well-serviced centre
- Commit to delivery of the Castlereagh Connection to address regional evacuation capacity and unlock the City Centre's potential

In this context, Penrith City Centre should be included on the High Growth Housing Capacity Map and the planned housing growth map (p.20), which identify areas expected to experience significant change over the 20-year life of the Plan. Evidence-based, place-based planning for the City Centre requires clear flood policy settings and defined evacuation expectations from the NSW Government.

- **Clarify flood-related terms and concepts**

The draft Plan (p.60) indicates that a Disaster Adaptation Plan (DAP) for the Hawkesbury–Nepean Valley will inform strategic planning and development assessment. Until the DAP is finalised, the flood planning principles in Appendix I are to apply. However, Appendix I lacks clarity on several key terms, including:

- *Climate change allowance*, with no guidance on applicable allowances or methodology
- *Sensitive development*, which is undefined
- *Vulnerable urban uses*, which similarly lacks definition

The use of subjective terms such as “if required”, “appropriate” and “less intensive” also creates uncertainty and risks inconsistent application. Clearer guidance is needed, including standardised definitions, explanatory notes with examples, and a consistent methodology for applying climate change allowances. Savings or transition provisions should also be included to allow councils sufficient time to incorporate changes into local strategic planning.

- **Address flooding and evacuation at the strategic planning stage**

Council strongly supports the DAP informing strategic planning decisions relating to housing targets, job density locations, land use zoning and permissible uses in flood-affected areas, consistent with Principle 6 in Appendix I. However, flood and evacuation considerations should not be deferred to development assessment, as suggested on p.60. These matters should be resolved upfront through strategic and precinct-level planning to provide certainty for councils, communities and investors.

- **Implications of flood mapping in the Sydney Plan**

The Key Natural Hazards Map (Figure 26, p.34) maps the 1 in 100 AEP flood extent for Eastern Creek, South Creek and the Hawkesbury–Nepean, disproportionately highlighting flood risk in Western Sydney. Other river systems that experience frequent flooding, including the Georges River (identified as one of the two highest-risk rivers on p.36), the Cooks River and the Parramatta River, are not similarly represented.

Flood mapping is also subject to change as studies are updated, climate change allowances evolve and mitigation measures are implemented. Including flood mapping in the Sydney Plan risks inconsistency with council-adopted flood mapping used for section 10.7 Planning Certificates, which should remain the single source of truth. Consideration should therefore be given to either removing flood mapping from the Key Natural Hazards Map or applying a consistent mapping approach across all major catchments.

- **Adopt an integrated approach to all natural hazards**

Action 9.1 focuses on implementing land use planning decisions arising from the Hawkesbury–Nepean DAP, with an emphasis on flood risk. While supported, a more integrated approach to all natural hazards, including urban heat and bushfire, is encouraged. This would provide clearer, more consistent guidance for land use planning and support more comprehensive mitigation of cumulative natural hazard risks affecting communities.

SEQUENCED GROWTH

Key Issues and Opportunities:

Council supports the management of development in a staged and orderly manner to ensure new housing and employment areas align with the timely delivery of infrastructure. Growth should occur in the right place and at the right time, where transport, utilities, open space and community facilities can be provided efficiently and sustainably.

Key recommendations/asks of Government:

- **Include public transport in the sequencing plan**

Council supports Action 10.1 (p.62), which commits the NSW Government to developing a medium-term sequencing plan for greenfield precincts in Sydney. This recognises the importance of aligning development with enabling infrastructure. While the draft Plan references access to water, wastewater, roads and electricity, public transport should also be explicitly included as a core consideration in sequencing to ensure new communities are well connected from the outset.

- **Recognise implications for councils' resources and infrastructure priorities**

Although no specific actions are assigned to councils under Response 10 (p.62), the development and implementation of a sequencing plan will have implications for council resources, infrastructure prioritisation and delivery. These impacts should be acknowledged, with appropriate coordination and support to ensure councils can align local planning, infrastructure delivery and resourcing with State-led sequencing decisions.

- **Update mapping and tables**

Amendments are requested to the Greenfield Precincts Map and associated table (Figure 42, p.63) to improve accuracy and clarity. Specific mapping and table changes are detailed in Appendix 3 of this submission.

URBAN FOOTPRINT

Key Issues and Opportunities:

Council's Rural Lands Strategy (RLS) provides a clear framework for managing and protecting the social, economic and environmental values of Penrith's rural areas. It sets a long-term direction for how rural land should evolve over the next 20 years, balancing agriculture, landscape character, biodiversity and rural living, while responding to growth pressures in a planned and deliberate way. The RLS, together with Council's Local Housing Strategy (LHS) and associated strategic work, reflects extensive community consultation and establishes a clearly defined rural edge for the Penrith LGA.

It is therefore important that the Urban Footprint identified in the Sydney Plan aligns with Council's adopted strategies until further consultation and strategic work is undertaken.

Key recommendations/asks of Government:

- **Align the Urban Footprint mapping with Council's adopted strategies**

The draft Sydney Plan proposes an Urban Footprint to signal where urban expansion will be contained and where rural areas will be safeguarded for productive uses. Council has already established a defined rural edge through its Rural Lands Strategy, which is reflected in the Local Housing Strategy. While Actions 11.3 and 11.4 are noted, the Urban Footprint mapping should remain consistent with Council's adopted RLS, LHS and associated strategic work until these actions are completed and further consultation occurs.

- **Clarify language relating to productive rural lands and potential transitions**

The draft Sydney Plan refers to rural and conservation areas beyond the Urban Footprint as having productive uses, including "logistics" (p.64). The intent of this

reference is unclear. It would be more appropriate for the Plan to refer to the productive uses identified in Appendix J, including agriculture, mineral and energy resources, extractive industries, tourism and recreation.

The draft Plan also suggests that some rural lands could transition to other productive uses if existing uses are no longer viable and land can be serviced and made development-ready, with higher priority given to higher value-add industries, uses leveraging the Western Sydney International Airport, or those integral to supply chains. While these uses are supported within the Aerotropolis and areas inside the Urban Footprint, extending such expectations to rural lands beyond the Urban Footprint risks undermining orderly growth sequencing and diverting infrastructure investment away from the Aerotropolis. Council considers that sufficient land is already zoned for productive uses within the Aerotropolis, and that additional growth pressures outside this area should be avoided.

- **Exclude areas with biodiversity values from the Urban Footprint**

Clarification is required on whether areas identified as having biodiversity values in Figure 43 (p.66) are excluded from the draft Urban Footprint. These areas should be mutually exclusive, with land identified for biodiversity protection clearly excluded from the Urban Footprint to avoid ambiguity and ensure consistent land use outcomes.

NATURAL ENVIRONMENT

Key Issues and Opportunities:

Council places strong emphasis on protecting and enhancing the natural environment, recognising the ecological value of bushland, waterways and habitat corridors across the LGA. Biodiversity conservation is supported through the protection of remnant vegetation, the prevention of habitat fragmentation, and the strengthening of connections between native vegetation communities, while also fostering strong community connections to nature.

Key recommendations/asks of Government:

- **Strengthen actions to protect and enhance the natural environment**

The draft Sydney Plan contains limited actions directly focused on protecting and enhancing the natural environment. While support is expressed for urban greening and tree canopy initiatives, there are no specific actions addressing waterway health or biodiversity conservation beyond urban areas.

Action 12.2, which requires the NSW Government to develop an urban greening guide, provides an opportunity to embed stronger biodiversity and environmental protection outcomes. The guide should place greater emphasis on integrating biodiversity considerations into sustainable urban planning and design, including the protection of ecological corridors and waterways.

Urban heat and cooling are addressed only at a high level in the draft Sydney Plan. Given that urban heat and the Urban Heat Island (UHI) effect are ongoing and intensifying challenges for urban areas, these issues warrant stronger and more

explicit treatment. Consideration should be given to addressing urban heat as a distinct response within the Sydney Plan, or strengthening its treatment under Responses 9 and 12, to ensure coordinated and effective mitigation measures are embedded across planning and design outcomes.

TRANSPORT

Key Issues and Opportunities:

Council recognises that recent investment in major infrastructure—including the Western Sydney International Airport (WSI) and Sydney Metro—will fundamentally reshape travel patterns across Western Sydney. These investments highlight the critical importance of a connected, efficient and integrated transport network to support Sydney's projected population and employment growth.

Transport is a key driver of land use outcomes, shaping where housing, jobs and centres can successfully develop. Council therefore emphasises the importance of strong integration between the Sydney Plan and the NSW Government's Future Transport Strategy, supported by sustained Federal and State investment in public transport infrastructure.

The Sydney Plan should continue to reflect the previous Government's commitment to deliver the full length of the north–south rail. Commitment to clear delivery timelines for the Sydney Metro – Western Sydney Airport line from Tallawong in the north to Macarthur in the south is critical to providing a true north–south spine for Greater Western Sydney.

Ongoing investment in transport connections for people and freight to and from WSI is essential to maximising the economic, social and productivity benefits of the Airport. This includes delivery of the Western Sydney Rapid Bus program and staged delivery of the Western Sydney Freight Line to support freight efficiency and manage congestion across the broader network.

Key recommendations/asks of Government:

- **Integrate the Sydney Plan with the Future Transport Strategy**

Council supports the "Connected" priority in the draft Sydney Plan, particularly the emphasis on early and coordinated delivery of public and active transport infrastructure to support housing and employment growth. However, the Plan does not sufficiently commit to high-frequency, turn-up-and-go bus services, seamless Metro and rail integration, or continuous and safe active transport networks. This may reflect the Plan's short five-year implementation horizon. Greater integration with, and commitment to funding of, the longer-term Future Transport Strategy is required to ensure transport investment keeps pace with growth.

- **Commit to public, active and freight transport connections to WSI and across Western Sydney**

The Sydney Plan should continue to reflect the commitment to deliver the full Sydney Metro – Western Sydney Airport line from Tallawong to Macarthur, as agreed under the Western Sydney City Deal. Operation of the Metro on a 24-hour, seven-day basis from commencement is essential to support the 24-hour WSI Airport and surrounding

employment precincts. Strong integration with existing rail services and local bus networks will be critical to reducing reliance on private vehicles.

The Western Sydney Rapid Bus infrastructure and program, also committed under the City Deal, should be clearly reflected in the Sydney Plan. In addition, strong support is expressed for freight planning initiatives that manage congestion and strengthen supply chain resilience, particularly the delivery of the Western Sydney Freight Line. Clear delivery timeframes and staging for the Freight Line and its enabling infrastructure are required. Strategic freight corridors, including Mamre Road, Elizabeth Drive and Luddenham Road, should remain State responsibilities, with upgrades fully funded by the NSW Government.

- **Deliver a frequent and connected local bus network**

The draft Sydney Plan's commitment to two future rapid bus corridors within Penrith LGA, namely Penrith–Airport via Kingswood and Mt Druitt–Airport via St Clair is welcomed, along with the initial phase delivered through the New Buses in Western Sydney program. To be effective, these corridors must be supported by a frequent local bus network connecting key growth areas and destinations, including Orchard Hills, Glenmore Park Stage 3, St Marys, Nepean Hospital, and employment areas such as Mamre Road and Erskine Park.

- **Designate intermodal terminals and the Western Sydney Freight Line as state significant**

While the draft Sydney Plan and the draft Statewide Industrial Lands Policy appropriately recognise the importance of industrial land to NSW's economic resilience, further clarity is required. The Mamre Road Intermodal Terminal, St Marys Intermodal Terminal and the Western Sydney Freight Line should be explicitly designated as state-significant freight and industrial infrastructure to support coordinated planning, infrastructure delivery and investment certainty.

DIGITAL MAPPING

Key Issues and Opportunities:

Council supports initiatives to improve the public accessibility, transparency and usability of mapping associated with the Sydney Plan. Clear, consistent and easily navigable mapping is essential to support informed decision-making by councils, industry and the community.

Key recommendations/asks of Government:

- **Provide all Sydney Plan mapping through a digital spatial viewer**

The provision of the Draft Sydney Industrial Lands Categorisation Map through a digital spatial viewer is supported and has proven useful. Extending this approach to all maps contained within the Sydney Plan and its appendices would significantly improve accessibility and usability. Making this mapping available through a single, publicly accessible digital spatial viewer, both during exhibition and on an ongoing basis, would provide a clear "single source of truth" and reduce the risk of inconsistencies arising from multiple static maps within PDF documents.

- **Resolve mapping inconsistencies**

Several mapping updates and clarifications are identified in Appendix 3 of this submission. Addressing these matters and resolving inconsistencies between maps contained in the Sydney Plan and its appendices is important to ensure clarity, accuracy and confidence in the Plan's spatial framework.

MONITORING AND EVALUATION

Key Issues and Opportunities:

Effective monitoring and evaluation are essential to ensure the Sydney Plan is delivering on its stated priorities and actions over time. Clear, measurable indicators are supported as a means of demonstrating progress, improving transparency and strengthening accountability across the metropolitan region.

Key recommendations/asks of Government:

- **Introduce clear, measurable indicators—particularly for transport outcomes**

The draft Sydney Plan notes that the proposed state land use plan will include state-level priorities and success indicators, with additional Sydney-specific indicators to be incorporated in the final Plan (p.67). The inclusion of indicators is supported, and there is an opportunity to strengthen this framework by incorporating measurable outcomes aligned to key priorities.

In particular, the "Connected" priority would benefit from the inclusion of clear transport accessibility indicators, such as the proportion of the population within 400 metres of frequent bus services and 800 metres of rail stations, Public Transport Accessibility Levels (PTAL), or other metrics aligned with the NSW Government's Wellbeing and Performance Framework. Such indicators would provide a transparent and consistent basis for tracking progress and assessing whether transport investment is effectively supporting housing, jobs and centres across Sydney.

A NEW APPROACH TO STRATEGIC PLANNING DISCUSSION PAPER

Key Issues and Opportunities:

Council supports efforts to improve the strategic land use planning framework so it is clearer, simpler and more effective, including the seven State priorities identified in the Discussion Paper. A more streamlined framework has the potential to improve alignment between plans, decision-making and delivery.

At the same time, the scale of reform proposed, the number of documents in development, and the intention to progress future updates through supporting or modular documentation highlight the importance of maintaining robust community and stakeholder engagement. Ongoing opportunities for feedback as the framework evolves will be critical to achieving positive, place-based planning outcomes and maintaining confidence in the planning system.

Key recommendations/asks of Government:

- **Exhibit the State Land Use Plan separately**

The Discussion Paper references a future State Land Use Plan but provides limited detail on its scope, content or timing. Given the State Land Use Plan will provide critical structure and context for the long-term and coordinated delivery of the Sydney Plan, it should be exhibited separately to enable meaningful community and stakeholder feedback.

- **Exhibit new and revised planning documents as standard practice**

The proposed modular structure, which would allow individual components such as priorities, policy responses or technical appendices to be updated independently (p.36), is noted. While this approach may allow greater flexibility and responsiveness, it is important that any new, updated or revised planning documents are exhibited and subject to submissions as standard practice. This will ensure transparency, accountability and ongoing community input into strategic planning decisions.

- **Clarify the role of the Housing Delivery Authority and Investment Delivery Authority**

The Discussion Paper does not address how the proposed simplified framework would interact with existing roles and responsibilities introduced in recent years, including proponent-led rezonings through the Housing Delivery Authority and Investment Delivery Authority. Clarification is sought on how these pathways fit within the proposed three-tier framework, noting that their continued role may be unnecessary or inconsistent with the intent of a clearer, stronger strategic planning hierarchy.

- **Provide clearer guidance on the hierarchy of plans for statutory assessment**

While the diagram on p.16 highlights the complexity of the current strategic planning framework, particularly at the State and regional levels, further detail is required to clearly articulate the hierarchy of plans that apply at the development application stage. In addition to the "matters for consideration" identified in the diagram, clearer guidance is needed on which plans prevail and how they are to be weighed in statutory assessment, to improve certainty for councils, applicants and the community.

DRAFT STATEWIDE POLICY FOR INDUSTRIAL LANDS

Key Issues and Opportunities:

Penrith Council is focused on harnessing growth and change to deliver more jobs and greater job diversity close to home for the community. Council strongly supports the principle articulated in both the draft Statewide Policy for Industrial Lands and the draft Sydney Plan that there should be no net loss of employment land. This principle is fundamental to achieving more liveable, productive and sustainable communities.

Penrith LGA has significant capacity to contribute to employment growth, with the potential to accommodate approximately 5,000 hectares of employment land. However, around half of this land is not yet serviced, and unlocking its potential will require coordinated Federal and NSW Government investment in enabling infrastructure.

Council welcomes the opportunity to work collaboratively with the Department of Planning, Housing and Infrastructure (DPHI) to better understand, refine and apply industrial land categorisations as part of future strategic planning.

Key recommendations/asks of Government:

Provide greater clarity on land categorisations and implications for planning controls

While Table 1 of the draft Policy (p.8) outlines the principles and metrics used to categorise industrial lands, the information provided is high-level. Further clarity is sought on the extent of ground-truthing, consultation and analysis undertaken to determine the categorisation of industrial lands within Penrith, particularly for lands identified as regionally and locally significant.

Additional guidance is also needed on the practical implications of these land categorisations for planning controls, including LEPs, DCPs and SEPPs. The draft documents do not clearly articulate the benefits or consequences of each category, nor the process and implications for councils wishing to change a land categorisation or pursue a review pathway over time, as referenced in section 3.5 of the draft Policy (p.17). Council has sought further advice from DPHI on these matters.

Clarify the application of the SP4 Enterprise zone and relevant SEPPs

Section 1.4 of the draft Policy states that it applies to "some SP4 Enterprise" zones (p.6). This wording requires clarification, either by confirming that the Policy applies to all SP4 Enterprise zoned land or by clearly outlining the criteria that determine when it does or does not apply.

This issue is particularly relevant to the Western Sydney University Werrington North and South sites, which are currently zoned SP4 and are subject to Council-led structure planning and a State-Assessed Rezoning Proposal involving significant change. While Council supports these sites being identified as employment land, clarity is needed as to whether they are also intended to be treated as industrial land under the draft Policy.

Section 1.4 also states that the Policy applies to "relevant State Environmental Planning Policies". It is recommended that a comprehensive list of relevant SEPPs be included in the Policy, rather than relying on selective examples. Appendix 2 of this submission identifies

instances within Penrith LGA where the interaction between the Policy and SEPPs requires greater clarity.

Designate key freight and intermodal infrastructure as state significant

Consistent with Council's comments on the draft Sydney Plan, the Mamre Road Intermodal Terminal, St Marys Intermodal Terminal and the Western Sydney Freight Line should be explicitly designated as state-significant freight and industrial infrastructure within the draft Policy and associated planning documents. This designation would support coordinated planning, infrastructure delivery and long-term investment certainty for these critical economic assets.

APPENDIX 1

Response to proposed Sydney Plan actions for councils

HOUSING – Pipeline of future housing

Council action and timing	Comment	What Penrith City Council is doing
1.4 Review and update local strategic planning and local environmental plans to align with the Sydney Plan and provide sufficient feasible capacity to meet housing targets 2027 and ongoing	Support in principle. Clarification sought on feasibility and larger pipeline of housing.	<ul style="list-style-type: none"> Council is well advanced in planning for housing growth in our LGA. Plans are with the NSW Government ready to be made to implement the St Marys Town Centre Master Plan (SMMP), positioning St Marys as a major strategic centre of Western Sydney. Preparation of a Structure Plan for the Kingswood-Werrington Corridor (KWSP) is underway. Council supports the regular review of its plans and controls to ensure these remain fit for purpose. Council's current work program includes an upcoming review of its LEP and DCP (scheduled for completion by Quarter 1 2028). Several of the draft Sydney Plan's proposed actions have already been planned for in our work program or can be readily accommodated into planned projects. Penrith LGA's housing pipeline can potentially deliver 20,000 new dwellings under existing zoned capacity. Council's Local Housing Strategy (2022) has demonstrated that there is theoretical capacity for up to 32,000 additional dwellings within our existing and master planned residential and mixed use zones, including in Glenmore Park Stage 3, Orchard Hills North and Sydney Science Park, as well as the Penrith City Centre should the dwelling cap be lifted.

HOUSING – Policy Directions

Council action and timing	Comment	What Penrith City Council is doing
2.6 Review local environmental plans, local contributions plans	Support.	<ul style="list-style-type: none"> Council's Local Housing Strategy sets out to focus future infill housing within the East-

and development control plans relating to Low and Mid-Rise Housing Areas designated under the Low and Mid-Rise Housing Policy 2026	<p>Recommend '2026-2027' timing.</p> <p>The Sydney Plan is expected to only be finalised by mid-2026, and there is a need to review these plans in tandem to ensure any increases in density are adequately supported by local infrastructure funding. Council's current work program has this action being completed by Quarter 1 2028.</p>	<p>West Corridor (i.e. Penrith to St Marys). Completion of the SMMP and work currently underway on a KWSP are evidence of the considerable work Council is doing to drive the growth of diverse housing in transport-orientated centres.</p> <ul style="list-style-type: none"> • Council's current LEP and DCP review will consider LMHR Areas and is scheduled for completion by Quarter 1 2028. • Council has a current program in place to review local contributions plans.
2.7 Identify areas outside Low and Mid-Rise Housing Areas that can accommodate more diverse housing choice based on public transport connections to stations Due - 2026-27	<p>Support.</p> <p>Recommend '2026-27 and ongoing' timing to align with Council's strategic planning.</p>	<ul style="list-style-type: none"> • Plans are ready to be made to implement the SMMP. • Preparation of a KWSP is underway. • Council's current LEP/DCP review is underway for completion by Quarter 1 2028.
2.8 Review minimum lot sizes requirements for dual occupancies outside Low and Mid-Rise Housing Areas Due - 2026-27	<p>Support.</p>	<ul style="list-style-type: none"> • Council's current LEP/DCP review will consider dual occupancy controls.
2.9 Consider more ways to provide high density development around stations and other transit hubs, where appropriate and feasible Due - 2026-27	<p>Support.</p> <p>Recommend '2026-27 and ongoing' timing to align with Council's strategic planning.</p> <p>Recommend finalising flood planning levels and policy to support and progress planning for Penrith City Centre.</p>	<ul style="list-style-type: none"> • Council looks forward to the NSW Government making an amendment to Penrith LEP (via a SEPP) for St Marys Town Centre. • Preparation of a KWSP is underway. • Council continues to advocate to the NSW Government to finalise the flood planning levels and flood planning policy for the Penrith LGA and Penrith City Centre; review and update flood evacuation modelling assumptions using a balanced risk management and merit based approach; remove the

		Penrith City Centre dwelling cap to allow more housing and jobs growth in an existing centre supported by infrastructure; and commit to delivering Castlereagh Connection as a solution to regional flood evacuation and to unlock Penrith City Centre's potential.
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HOUSING – Affordable Rental Housing

Council action and timing	Comment	What Penrith City Council is doing
3.3 Prepare and adopt an affordable housing contribution scheme 2027	Support. Clarification sought on impact (if any) on existing schemes.	<ul style="list-style-type: none"> Council supports the delivery of additional affordable rental housing in our LGA. Council has adopted an Affordable Housing Strategy and Action Plan, and Affordable Housing Contributions Scheme (AHCS) for Growth Areas. Our Contributions Scheme currently provides for the collection of contributions at Glenmore Park Stage 3 and Orchard Hills North. An amendment to the AHCS to support affordable housing in St Marys will come into effect alongside the implementation of the Master Plan for the Town Centre.
3.4 Identify surplus Council-owned land for affordable housing 2027	<p>This work is underway by Council.</p> <p>Council adopted its Affordable Housing Strategy and Action Plan in 2023.</p> <p>Council's established position is that surplus land not required for community purposes is typically to be sold or leased at full market value, with proceeds used to support revenue streams beyond rates.</p> <p>It is our view that targeted approaches (e.g. pilot project in Council's Action Plan) are</p>	<ul style="list-style-type: none"> Council adopted its Affordable Housing Strategy and Action Plan in November 2023. The Action Plan has an action to investigate on a case-by-case basis, the feasibility of delivering a pilot project on Council-owned land. This work is underway.

	more meaningful than the broad-brush action 3.4.	
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EMPLOYMENT/INDUSTRIAL LANDS

Council action and timing	Comment	What Penrith City Council is doing
4.3 Review and update planning controls for E1 and E2 zones within the identified Low and Mid-Rise Housing Areas to increase floor space for goods and services to meet the needs of new residents and to consider shop top housing 2027	Clarification sought on applying this action in the Penrith context. In particular, there is no E1 or E2 zoned land within Penrith's LMRH areas, and areas in the vicinity, like Penrith City Centre, are constrained by current dwelling caps.	<ul style="list-style-type: none"> The St Marys Town Centre Master Plan is a recent example where shop-top housing associated with employment has been considered and adopted by Council. Council will consider this as part of place-based strategic planning.
4.4 Investigate and implement revised statutory provisions to enable new jobs in and out of centres, including responding to infrastructure availability 2026 and ongoing	Support.	<ul style="list-style-type: none"> Council welcomes the strong focus being given to jobs and the protection of employment/industrial lands within the exhibited material. It has long been Council's position that new housing must be supported by job generation, enabling our residents to work closer to home. Council has in place an Employment Lands Strategy, Economic Development Strategy and Visitor Economy Strategy to help guide jobs growth in our LGA. Council has already undertaken considerable work on ensuring its planning instruments and controls are fit to deliver employment growth opportunities. In 2025, Council finalised an Employment Lands Planning Proposal that further refined our land use planning framework in response to the NSW Government led Employment Lands Review and SEPP amendment. Further work is being undertaken by Council as part of the LEP and DCP review currently underway.

		<ul style="list-style-type: none"> Preparation of a KWSP is underway, which will also consider new jobs in and out of centres.
8.7 Review locally significant industrial lands in line with the draft statewide policy and incorporate into future local planning 2026 and ongoing	Clarification sought on categorisation.	<ul style="list-style-type: none"> As indicated above, Council welcomes the strong focus being given to the protection of industrial lands within the exhibited material. Council's Employment Lands Strategy is in place, with a key focus on protecting employment lands.
8.8 Update local zoning of industrial lands to be consistent with the statewide policy 2026-27	Clarification sought on categorisation.	<ul style="list-style-type: none"> In 2025, Council finalised an Employment Lands Planning Proposal that further refined our land use planning framework in response to the NSW Government led Employment Lands Review and SEPP amendment.

INFRASTRUCTURE/CONTRIBUTIONS

Council action and timing	Comment	What Penrith City Council is doing
5.4 Regularly review infrastructure contributions plans to reflect infrastructure priorities and staging through the UDP and ELDP Minimum every 4 years, aligned to Council delivery programs	<p>Support in principle.</p> <p>Recommend removing 'aligned to Council delivery programs' under timing.</p> <p>Council currently has 16 contribution plans, and as such, it may be impractical for Council to review each of these plans every 4 years, especially if aligned to other programs. It is in a council's interest to review contributions plans when circumstances change, but setting a rigid timeframe is considered onerous and unnecessary.</p>	<ul style="list-style-type: none"> Council supports the regular review of contributions plans to ensure these are up-to-date and fit for purpose. For example, Council has recently adopted a new contributions plan for Orchard Hills North to support the delivery of infrastructure and facilities within this growth area. Council also has a current program to review our contributions plans.
5.5 Review infrastructure schedules to reflect land use planning directions and current works and land acquisition costs Minimum every 2 years from 2026	<p>Support in principle.</p> <p>Recommend 'ongoing' timing.</p> <p>The timing would be an onerous task for Council given the large number of contributions plans and large area covered.</p> <p>Refer further discussion of the possible implications below – such</p>	<ul style="list-style-type: none"> Council supports the regular review of infrastructure schedules which will be considered as part of the current program to review our contributions plans.

	as IPART process, dwelling cost cap.	
5.6 Identify specific planned infrastructure works to be delivered within Council delivery programs and operational plans 2026 and ongoing	Support.	<ul style="list-style-type: none"> Council is developing a framework for nominating, evaluating and allocating funds from infrastructure contributions to deliver new infrastructure. This framework is expected to be in place by FY 2026/27.

USE OF UDP AND ELDP

Council action and timing	Comment	What Penrith City Council is doing
5.3 Use UDP and ELDP data to inform infrastructure planning at the local level 2026 and ongoing	Guidance sought on the use of UDP and ELDP to inform local-scale infrastructure planning.	<ul style="list-style-type: none"> When preparing an infrastructure list to inform a Contributions Plan, Council takes into account a number of metrics and also considers feasibility and capacity to pay. Unless further clarification is provided, it is anticipated that the UDP and ELDP data would be one of the inputs to inform infrastructure planning.

CENTRES

Council action and timing	Comment	What Penrith City Council is doing
6.3 Establish special entertainment precincts where appropriate to accommodate critical community arts, cultural and retail uses as part of Council-led precinct planning 2026-29	Support.	<ul style="list-style-type: none"> Council's adopted Penrith and St Marys 24 Hour Economy Strategy includes an action to "Work with the NSW Government to investigate potential areas within the Penrith LGA that could qualify as a Special Entertainment Precinct".

OPEN SPACE

Council action and timing	Comment	What Penrith City Council is doing
7.4 Review Councils' existing and future open space provision and identify local opportunities to align the NSW Government's open space outcomes	Support in principle. Recommend 'ongoing' timing as open space planning to cater for growth is an iterative process.	<ul style="list-style-type: none"> Council's Green Grid Strategy and Sports and Recreation Strategy currently identify future open space needs and opportunities including rates of provision.

2027-29		<ul style="list-style-type: none"> Council continues to advocate to the NSW Government in relation to Fernhill Estate and Penrith Lakes as key opportunities to expand metropolitan public open space.
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NATURAL HAZARDS/FLOODING

Council action and timing	Comment	What Council is doing
9.5 Review hazard studies using up-to-date, local place-based data on current and future exposure and vulnerability to hazards to inform land use and infrastructure planning decisions 2026 and ongoing	Support.	<ul style="list-style-type: none"> Council has a current program in place to develop/review Floodplain Risk Management Studies, Strategies and Plans for flood affected areas. Council supports evidence-based, place-based planning for the future of Penrith City Centre and, as indicated above, continues to advocate to the NSW Government for a bespoke flood planning solution.
9.6 Relevant Councils to implement coastal management programs and associated planning actions 2026 and ongoing	Not applicable	Not applicable
9.7 Relevant Council to prepare DAP implementation plans that outline how the Hawkesbury Nepean Valley DAP will be implemented through local strategic planning 2026-27	Support.	<ul style="list-style-type: none"> Awaiting release of DAP.

SEQUENCED GROWTH

- No corresponding Council actions proposed in draft Sydney Plan.

URBAN FOOTPRINT

Council action and timing	Comment	What Penrith City Council is doing
11.4 Relevant Councils to review the interface between the urban and rural	Support in principle. Recommend the timeframe be extended given the Sydney Plan is not expected	<ul style="list-style-type: none"> Council has determined a rural edge in the Penrith LGA through its Rural Lands Strategy which was developed through extensive community consultation and

lands to inform the urban footprint 2026	to be finalised until mid-2026. Recommend the urban footprint mapping be consistent with Rural Lands Strategy until review undertaken and extend timing to allow for review.	reflected in our Local Housing Strategy.
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NATURAL ENVIRONMENT

Council action and timing	Comment	What Penrith City Council is doing
12.3. Develop locally appropriate canopy and greening targets 2026-30	Support.	<ul style="list-style-type: none"> Work has been undertaken to develop canopy targets and apply them as place-based strategic planning is undertaken. For example, the canopy targets adopted in the SMMP have been incorporated into Council's draft amendment to the DCP.

TRANSPORT

- No corresponding Council actions proposed in draft Sydney Plan.

DIGITAL MAPPING

- No corresponding Council actions proposed in draft Sydney Plan.

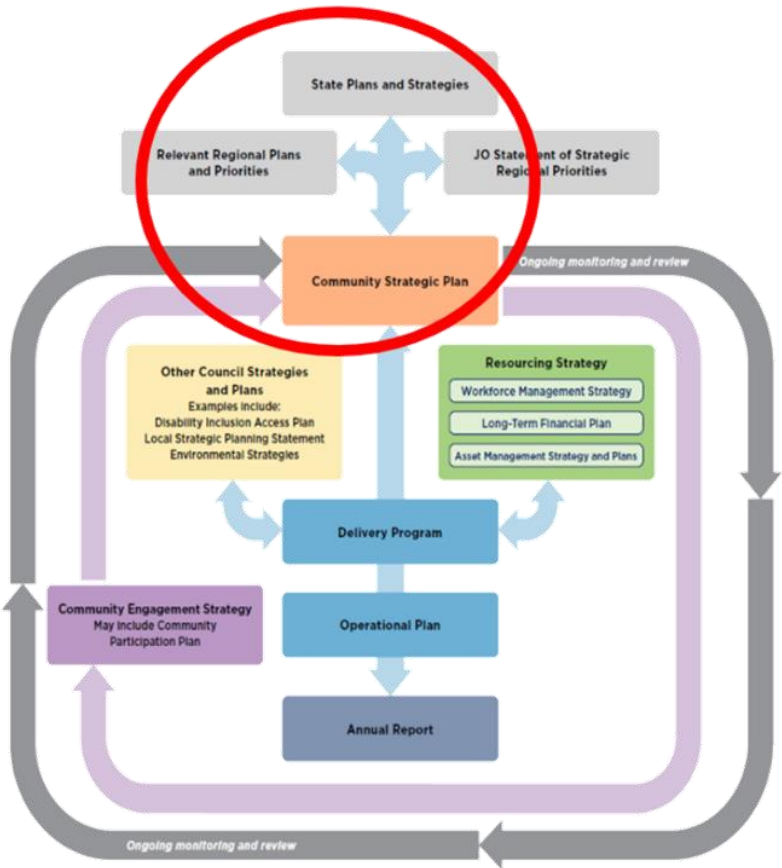
MONITORING AND EVALUATION

- No corresponding Council actions proposed in draft Sydney Plan.

APPENDIX 2

Diagram from Integrated Planning and Reporting Handbook for Councils:

- The two-way relationship between state and regional plans to CSPs is depicted.



APPENDIX 3

Table Updates:

- Appendix D provides information on the pipeline of State rezonings to support the growing housing and employment needs of Sydney. The document (pg 3) includes the SARP for Western Sydney University's Werrington sites. These sites are identified in Council's Employment Lands Strategy as having the potential to provide up to 6,000 jobs. Appendix D states that the number of potential jobs under the SARP will be 313. Council understands from the Planning Proposal submitted to Council that the figure should be approximately 1,230 jobs.
- The following changes are requested to the Greenfields Precincts Map and table (Fig 42 / pg. 63) of the draft Sydney Region Plan:
 - Rename 'St Marys Central Precinct (SM)' to Jordan Springs -being the area's registered suburb name since 2011.
 - Consider removing Caddens Road (CR) as this precinct is almost completely built and will be even more complete by the time the Sydney Plan is adopted.
 - Consider distinguishing between predominately residential and employment precincts. For example, the NSW Government has previously confirmed that North Luddenham will not have housing.

Mapping Updates:

- The Employment Network Map (Fig 18 / pg. 24) would be better labelled as 'Industrial Lands' as it does not include employment lands/job density in retail and commercial centres like those shown in Figure 36 (pg. 51).
- The Employment Network Map (Fig 18 / pg. 24) and Current Industrial Lands Map (Fig 24 / pg. 31) do not include the recently rezoned E4 Luddenham Road Industrial Business Park (221-235 Luddenham Road, Orchard Hills), yet this site is on the Industrial Lands Map (Fig 40 / pg. 59) and in Appendix H.
- The Western Sydney International (WSI) Airport is not included on Figure 18 but is included on Figure 40.
- Figure 24 cuts out North Penrith, Emu Plains and Jamisontown Industrial Precincts. The circle should be enlarged to incorporate these three important industrial precincts.
- In Appendix E (pg. 29) and Appendix H (pg. 7), mapping of 'employment land' does not correspond to the maps in the draft Sydney Plan (namely the Employment Network Map (Fig 18 / pg. 24)) and has key employment areas missing.
- In Appendix F, the open space map (pg. 4) is labelled as '20 year high priority open space map', while Figure 39 (pg. 57) of the draft Sydney Plan is labelled '5 year high priority open space map'. The maps are understood "to guide investment for the provision of open space to 2045" (pg. 56) and should be labelled accordingly.
- The draft Urban Footprint is shown as a 'base layer' across many maps including Figures 1, 11, 13, 18, 25, 26, 28, 33, 40, 42 and 43 in the draft Sydney Plan and in Appendix

G. It is suggested that a single map of the Urban Footprint be presented so that its parameters are not confused by overlapping layers of other maps and features.

- The existing St Marys IMT and proposed WSFL are missing from the Connect Sydney Map (Fig 25 / pg. 32) and should be shown. The St Marys IMT is also not shown on the Current Industrial Lands Map (Fig 24 / pg. 32).
- The depiction of the WSFL upon Fig 24 (pg. 31) should show both stages of the project (esp. to the main West Line (T1)) and label the staging, consistent with Transport for NSW's recent documentation (<https://www.transport.nsw.gov.au/system/files/media/documents/2025/Western-Sydney-Freight-Line-and-Intermodal-Terminal-brochure-August-2025.pdf>).



List Needed - SEPP Applicability:

- Section 1.4 (pg. 6) of the draft Statewide Policy for Industrial Lands states that it applies to relevant SEPPs but does not provide a full list of those SEPPs. For instance, the supporting mapping includes areas zoned under SEPPs but not included in this list:
 - Land zoned EP Employment under SEPP (Western Parkland City) 2021 Chapter 5 Penrith Lakes Scheme being Nos. 30-68, 70-98 and 14-28 Old Castlereagh Road, Penrith (Nepean Business Park).
 - Land zoned EM Employment under SEPP (Western Parkland City) 2021 Chapter 6 St Marys.