

DRAFT SUBMISSION

Community Participation Plan

Discussion Paper
& Draft Plan

June 2026



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Recommendations

Recommendation 1:

That opportunities for community participation meet the stated objectives of being 'Open' and 'Inclusive' and also 'Easy to Access' by providing tools, mechanisms and guidance for councils on how to specifically engage with the young, old, people living with disabilities, those living in rural areas, Aboriginal and Torres Strait Islanders and CALD people.

Recommendation 2:

That the CPP include guidance and flexibility to allow longer exhibition periods where remoteness, limited digital access, travel distance or other practical barriers may affect the community's ability to access material and participate meaningfully.

Recommendation 3:

That principles of planning proportionality satisfy the community participation objective of 'Relevance' by ensuring that the type of community engagement and whether there is the ability to participate, or just be informed, is clear to the public.

Recommendation 4:

That opportunities for community participation meet the objectives of being 'Timely' and 'Meaningful' by ensuring that each stage of the planning assessment process is subject to its own opportunities for community engagement.

Recommendation 5:

The NSW Government should retain meaningful statutory consultation on planning proposals and rezonings, even where earlier strategic engagement has occurred.

Recommendation 6:

The NSW Government should clarify references to district plans in the draft CPP to align with the NSW Government's proposed strategic planning framework, which proposes to discontinue district plans.

Recommendation 7:

That the final CPP require key CDC information, such as relevant plans and certifier contact details, to be made available to affected neighbours.

Recommendation 8:

That the CPP makes clear the circumstances or considerations as to when minimum exhibition timeframes can be extended on a case-by-case basis as noted in Table 5.

Recommendation 9:

That the CPP is amended to remove residential flat buildings and shop top housing from Table 6, allowing these developments to be publicly exhibited.

Recommendation 10:

That the NSW Government commit to a timely and jointly coordinated approach to any proposed updates and changes to the Office of Local Government's Integrated Planning and Reporting Guidelines and Handbook, so that terms and definitions of engagement strategies are universally understood and incorporated into the Statewide Community Participation Plan.

Recommendation 11:

The CPP should be amended to include a 28-day minimum exhibition period for SSD applications with concurrent rezonings, to make this consistent with the proposed 28-day exhibition of planning proposals.

Recommendation 12:

That the CPP be strengthened to clearly define or provide guidance on the application of “urgency, scale and nature” in relation to SEPP changes and EIE exhibition.

Recommendation 13:

That the CPP be amended to adopt a minimum 6-week (42-day) exhibition period for major policy reforms, complex or system-wide changes and proposals with significant local government implications, including guidance or criteria for when these longer exhibition periods would apply.

Recommendation 14:

That the draft CPP be updated to recognise the growing use of digital tools and AI in community participation and include guidance and safeguards that support public confidence through transparency, equity and inclusivity, human oversight and privacy.

Recommendation 15:

That the NSW Government recognise the resourcing implications of strengthened early engagement requirements and provide councils with practical support (such as templates, tools, guidance) and targeted funding for precinct-level and strategic engagement activities.

Recommendation 16:

That the final CPP includes clear, staged transitional and savings arrangements, including defined timeframes, implementation guidance and support for councils, to ensure a realistic and well-resourced transition to the new framework.

Recommendation 17:

That the CPP include clear performance measures, a commitment to regular public reporting, and structured council input into evaluation processes, alongside an initial 12-month review of timeframes followed by an ongoing review cycle.

Opening

Local Government NSW (LGNSW) welcomes the opportunity to provide a submission to the NSW Department of Planning, Housing and Infrastructure (DPHI) on the *Proposed statewide Community Participation Plan* (Draft Community Participation Plan and Discussion Paper)¹.

In principle, LGNSW supports the NSW Government's commitment to establish a statewide Community Participation Plan (CPP) as an important step toward greater consistency and effectiveness in the planning system. Community participation is fundamental to achieving good planning outcomes. At a time of significant planning reform, housing demand and community sensitivity to change, a well-designed participation framework is critical not only to efficient decision-making, but to maintaining public confidence. The success of a statewide CPP will depend on ensuring participation is meaningful, timely and adequately resourced.

A key position underpinning this submission is that a shift toward earlier, strategy-led engagement must not come at the expense of clear and credible opportunities for community input at later statutory stages where it may be warranted due to local impacts or community concern. Reducing notification and exhibition requirements for developments with significant local impacts, without a strong foundation of earlier engagement, risks undermining community trust and the social licence needed to support growth.

This submission begins with some overarching comments to highlight councils' current issues and key positions and outlines the context for councils' community engagement functions, with the remainder of the submission structured to respond to the Discussion Paper and Draft Community Participation Plan.

This submission is informed by the policy positions of LGNSW and consultation with NSW councils. Please note this submission is provided as a draft, pending endorsement by the LGNSW Board at its next meeting. We will advise any amendments to the submission in due course.

¹[Proposed statewide Community Participation Plan](#)

Legislative context

The objects of the *Environmental Planning and Assessment Act, 1979* (EP&A) Act include: *(h) to provide opportunities for participation in environmental planning and assessment.*

Prior to amendments in the *Environmental Planning and Assessment Amendment (Planning System Reforms) Act 2025* each council (and State agencies) had a statutory obligation² to have its own adopted CPP³ resulting in over 120 CPPs in use. As councils bring essential local knowledge, experience and fine-grain planning capability about their local communities, locally tailored plans can deliver a more effective and responsive outcome.

As a planning authority, councils are required to have regard to a number of matters under the EP&A Act (Part 2, Division 2.6) in relation to CPPs, most notably section 2.23 (2):

- (a) *The community has a right to be informed about planning matters that affect it.*
- (b) *Planning authorities should encourage effective and on-going partnerships with the community to provide meaningful opportunities for community participation in planning.*

The subsequent matters under section 2.23 (2)(c)-(h) consider the means and methods of engagement, which reflect similar components of a council's Community Engagement Strategy, required under the *Local Government Act 1993* (LG Act).

Requirements for councils to engage and report to their communities are not confined to the EP&A Act. The LG Act⁴ also establishes relevant obligations, supported by guidance from the NSW Office of Local Government (OLG) which requires that "*A community engagement strategy must be prepared, adopted and implemented, based on social justice principles for engagement with the local community...*"⁵

In addition, the requirement to engage with community is a statutory provision under various state legislation (such as the *National Parks and Wildlife Act 1974*) and as prescribed in provisions of the EP&A Act. Usually, these processes respond to potential environmental impacts and often occur concurrently. The proposed statewide CPP cannot override the requirements of these other Acts. It is important therefore that the proposed statewide CPP does not conflict with the interwoven legislative requirements of all relevant processes and does not diminish the effectiveness of the current locally tuned CPPs.

² Under [Division 2.6 of EP&A Act](#)

³ [Community Participation Plans | Planning Portal - Department of Planning and Environment](#)

⁴ [Section 402A of the LG Act](#)

⁵ [Integrated planning and reporting - Guidelines for Local Government in NSW](#), September 2021

As noted above, the NSW Government's 2025 planning reforms have changed the landscape by proposing 'proportionality' to the assessment and determination of planning matters – that is, calibrating the extent of public participation (and assessment) proportional to the complexity of the development proposed. The NSW Government considers proportionality to be a risk-based approach.

LGNSW broadly agrees that consultation and participation should be proportionate to risk and impact. The concern is that the draft CPP applies this principle in a way that may unduly curtail community participation, including in circumstances where a proposal's impacts, community interest or statutory significance may still warrant more meaningful engagement.

Role of local government in community participation

Councils play a central role in community participation across the NSW planning system. As the level of government closest to local communities, they are responsible not only for meeting statutory exhibition and notification requirements, but also for designing and delivering engagement that is accessible, place-based and responsive to local circumstances.

Through their planning and governance responsibilities under the EP&A Act and the LG Act, councils regularly involve communities in decisions about land use, development and local priorities. This includes engagement on strategic plans (such as local strategic planning statements (LSPSs), precinct and master plans and planning proposals which precede land rezonings), development applications and broader local strategies (such as for housing and employment lands). In performing their many planning functions, councils use different participation methods to ensure communities are informed. Their land use planning functions involve both statutory responsibilities, required by legislation, and non-statutory activities that support strategic local development.

Councils' strength lies in their understanding of local context and their established relationships with communities. This enables them to tailor engagement approaches to different places and populations, helping ensure participation is meaningful rather than merely procedural.

For this reason, any statewide framework for community participation should preserve councils' ability to apply local knowledge and flexible engagement methods. Improving consistency across the planning system is important, but it should not come at the expense of genuine opportunities for communities to be informed, heard and involved in decisions that affect them. Reducing community participation timeframes and/or limiting community input to just the early strategic stages of the planning process will only serve to result in poorer outcomes for communities, worsen public trust in the planning system and harm the social licence for growth and density.

Overview of proposed statewide Community Participation Plan and Discussion Paper

The changes being proposed in the Discussion Paper include:

- Extending minimum consultation timeframes on state-level strategic planning initiatives like Region Plans and the State Plan from 45 days to 60 days.
- Standardising the process for notification of Complying Development and giving neighbours 7 days' notice before any works begin.
- Standardising and reducing the number of local development application types that need to be exhibited by councils to those with the highest impact.

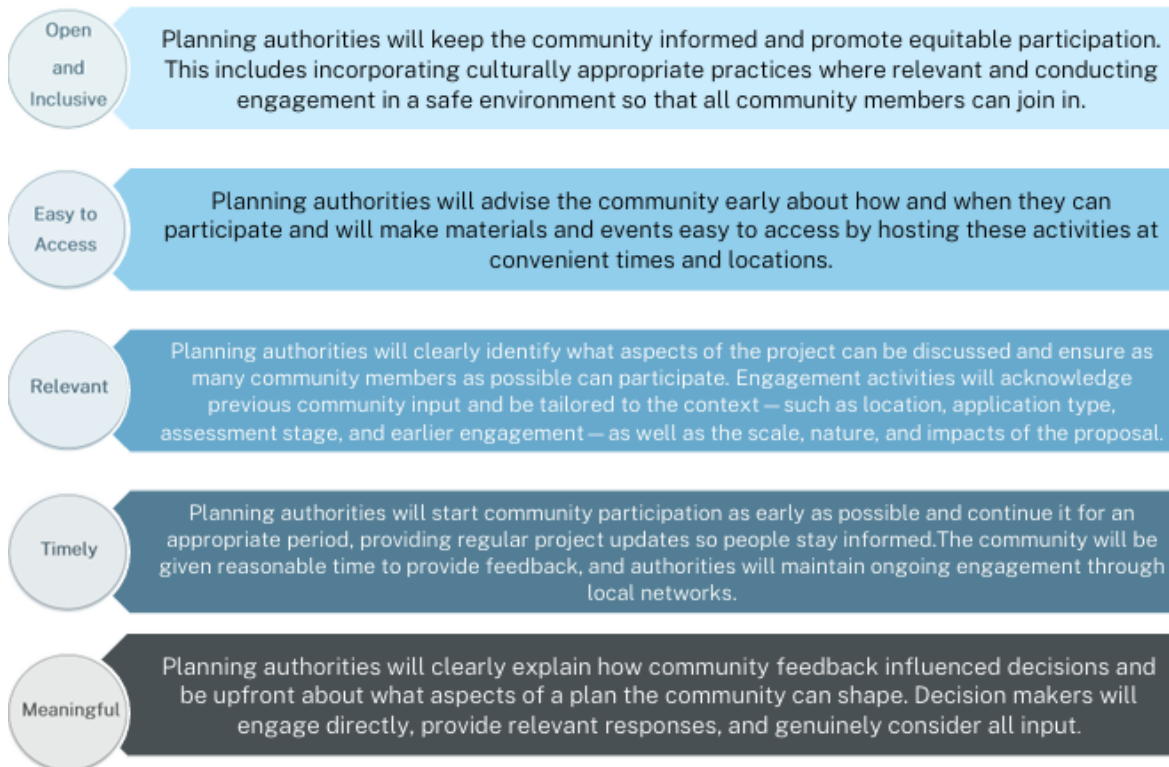
Other key points about the intent of the CCP:

- Ensuring all audiences can engage effectively, including young people, people living with disabilities, the elderly, those living in rural areas, Aboriginal and Torres Strait Islanders and culturally and linguistically diverse (CALD) people.
- Proportionality: The CPP and Discussion Paper aim to adopt an approach of proportional consultation - reducing participation for low-risk or strategically assessed projects while preserving community input on significant developments.
- DPHI foreshadowing an update to NSW OLG's Integrated Planning and Reporting Guidelines and Handbook (2021) as an outcome of the statewide CPP being adopted.

The draft Community Participation Plan (CPP) and Discussion Paper invite feedback on whether the NSW Government's proposed approach to community engagement at different phases of the strategic planning (plan making) and statutory planning (development assessment) processes provide an effective basis for satisfying community participation objectives.

Community participation objectives

Included in the plan are objectives aligned to community participation principles of the EP&A Act. These are reproduced below.



Source: Draft Community Participation Plan – Community Participation Objectives (p 7)

LGNSW response

LGNSW welcomes the intent of ensuring the community gets timely and meaningful opportunities to participate throughout the strategic and statutory stages of the planning processes, in accordance with the objects of the EP&A Act. There should also be consistency with the community participation objectives as cited above.

LGNSW supports a clearer, more consistent system but it must retain local flexibility and place-based engagement to respond to individual community needs as they vary across the State. Councils are well placed as trusted, place-based institutions to remain central to leadership in community participation – they know how to be able to reach the old/young, Aboriginal and Torres Strait Islanders or Culturally and Linguistically Diverse (CALD) communities according to the demographics of their local government area.

This is particularly important in rural, regional and remote areas, where participation may be affected by practical access barriers. Community members may have limited or unreliable internet access, lower digital confidence, or need to travel significant distances to inspect plans or seek assistance in person. A statewide framework should recognise these realities and allow sufficient flexibility in engagement methods and timeframes to ensure participation is genuinely accessible and meaningful across different parts of NSW.

To ensure that public participation is universally understood and is also best practice, LGNSW recommends tools, mechanisms and guidance for councils on how this can achieve the community participation objectives of proportional consultation.

Recommendation 1:

That opportunities for community participation meet the stated objectives of being 'Open' and 'Inclusive' and also 'Easy to Access' by providing tools, mechanisms and guidance for councils on how to specifically engage with the young, old, people living with disabilities, those living in rural areas, Aboriginal and Torres Strait Islanders and CALD people.

Recommendation 2:

That the CPP include guidance and flexibility to allow longer exhibition periods where remoteness, limited digital access, travel distance or other practical barriers may affect the community's ability to access material and participate meaningfully.

Recommendation 3:

That principles of planning proportionality satisfy the community participation objective of 'Relevance' by ensuring that the type of community engagement and whether there is the ability to participate, or just be informed, is clear to the public.

Recommendation 4:

That opportunities for community participation meet the objectives of being 'Timely' and 'Meaningful' by ensuring that each stage of the planning assessment process is subject to its own opportunities for community engagement.

Strategic planning - notification and exhibition

Proposed changes to regional plans, LSPSs, master plans, and planning proposals

The Discussion Paper proposes the following changes to exhibition and notification of strategic and land use plans:

- **Regional plans:** Extend the minimum non-legislated public exhibition timeframe for draft regional or district strategic plans to 60 days from 45 days;
- **LSPS:** A minimum non-legislated 60-day public exhibition timeframe for LSPSs
- **Precinct and master plans:** A standard 42-day public exhibition period for master plans as best-practice (unless adjusted due to urgency, scale or the nature of the project)
- **Planning proposals:** Shorten or remove public exhibition timeframes to between zero and 14 days for planning proposals where consultation has already occurred as part of a recent master plan or related strategic planning update (and otherwise retain 28 days exhibition timeframe or as specified by the gateway determination).

LGNSW response

LGNSW welcomes the earlier and more meaningful community participation that has been proposed for strategic and land use planning, including longer exhibition periods for regional plans, LSPs and master plans. However, early engagement must not be used as a rationale to dilute or remove consultation at later statutory stages, particularly for planning proposals and rezonings.

Master plans and planning proposals

LGNSW supports the continued application of a minimum 28-day exhibition period for planning proposals. Rezonings are the key legal decision point affecting land use rights, and communities must retain a clear and meaningful opportunity to comment on the actual statutory controls being proposed.

Retaining a clear baseline exhibition requirement for planning proposals is a key statutory opportunity for the community to provide input on zoning and land use controls. However, the Discussion Paper also proposes that where consultation has occurred at the master plan stage, planning proposal exhibition may be reduced to between zero and 14 days.

LGNSW supports maintaining distinct and meaningful exhibition processes for both master plans and planning proposals, ensuring master plans do not replace statutory consultation requirements. Strategic plans and master plans are often broader, more conceptual and less certain than the planning proposals that follow, and in councils' experience, they cannot automatically substitute for later statutory public exhibition. This concern is compounded where later State Environmental Planning Policies (SEPPs) - for example Transit Oriented Development (TODs) and Low and Mid-Rise (LMR) policies - introduce outcomes that were not clearly foreshadowed during exhibition. In these circumstances, earlier engagement does not guarantee participation from all affected stakeholders nor does it capture issues that only emerge at the statutory stage. This leaves councils to manage community expectations about outcomes that were neither clearly anticipated nor meaningfully shaped through the earlier process.

LGNSW recommends retaining a minimum exhibition period (at least 28 days as default) and limiting the ability to reduce exhibition timeframes to clearly defined, transparent and exceptional circumstances. Where there are material changes, significant time gaps or increased impacts, the community's opportunity to comment on planning proposals must not be removed. Without these safeguards, the proposed changes risk shifting the burden of community dissatisfaction onto councils and undermining public confidence in the planning system.

LGNSW acknowledges the Discussion Paper's intent to reduce duplication in engagement processes and streamline planning approvals, but removing statutory consultation is not equivalent to removing duplication. Duplication should be addressed through better integration and sequencing of engagement and clearer communication to communities about planning stages, rather than by removing or significantly reducing statutory exhibition requirements.

District plans

LGNSW also notes that the draft CPP refers to 'district plans', despite current strategic planning reforms indicating these plans may not continue in the future. This inconsistency should be clarified to avoid confusion and misplaced expectations.

Recommendation 5:

The NSW Government should retain meaningful statutory consultation on planning proposals and rezonings, even where earlier strategic engagement has occurred.

Recommendation 6:

The NSW Government should clarify references to district plans in the draft CPP to align with the NSW Government's proposed strategic planning framework, which proposes to discontinue district plans.

Local development – notification and exhibition

Proposed changes to notification and exhibition of CDCs and DAs

The Discussion Paper proposes the following changes to exhibition and notification of complying development certificates (CDCs) and development applications (DAs):

- **CDC pre-commencement** - A standard 7-day pre-commencement notice for CDCs statewide, by amending current regulations⁶ to:
 - remove the 7 day (for Pattern Book development) and 14 day written notice requirements before a CDC is determined
 - standardise a 7-day pre-commencement of work notification for new buildings, additions and demolition in all LGAs
- **CDC notice to councils** - Retention of the current notice to council advising the CDC determination
- **DAs** - Expanding the list of certain development types that will be exempt from public exhibition and notification⁷, where the development:
 - is permissible in the relevant zone and,
 - meets the relevant planning controls in a local environmental plan, development control plan and/or state environmental planning policy and
 - does not include a 4.6 variation(Notably, this list includes residential flat buildings and shop top housing.)
- **Standardised 14-day exhibition for all other DAs** not listed as exempt from public exhibition and notification: A minimum 14-day exhibition period applies for development not listed in Table 6 of the draft CPP and does not meet the above criteria.

LGNSW acknowledges the benefits of improved consistency and clarity in notification and exhibition practices across NSW and supports the concept of proportionality,

⁶ Environmental Planning and Assessment (EP&A) Regulation 2021

⁷ Listed in Table 6 of the draft CPP

ensuring engagement reflects the scale and impact of development. However, DA notification and exhibition processes are central to maintaining community confidence in local planning decisions and councils are concerned to ensure the reforms do not reduce transparency, accountability or the ability for communities to be informed about development in their area.

Complying Development Certificates (CDCs)

LGNSW notes the intention to bring greater consistency to the notification of CDCs across NSW. However, councils have observed that existing notification requirements do not always ensure that immediately affected neighbours are aware of approved works or can readily understand their scope, often resulting in councils receiving inquiries about projects and certifier details. The framework should support greater transparency by ensuring affected property owners can access key information about the approved development, including relevant plans and certifier contact details.

Recommendation 7:

That the final CPP require key CDC information, such as relevant plans and certifier contact details, to be made available to affected neighbours.

Local Development Applications (DAs)

Minimum exhibition timeframes

LGNSW notes the proposal in Table 5 of the draft CPP to standardise exhibition requirements with 14 days as the minimum for certain local development, and supports the CPP's inclusion for these minimum exhibition timeframes to be extended on a case-by-case basis. Embedding this flexibility to extend DA exhibition times on a case-by-case basis allows councils to retain discretion for complex or contentious applications or to respond to local sensitivities and community expectations. The CPP should include details to help make clear the circumstances or considerations as to when an extended exhibition may apply.

Development exempt from exhibition and notification

The draft CPP (Table 6) proposes an extensive list of development types to be exempt from public exhibition and notification where they meet planning controls. For some councils this will remove existing notification requirements for a broader range of development types, with some concerned about changes to notification requirements for higher-impact uses such as residential flat buildings, shop top housing, change of use in industrial areas, agritourism, and commercial farm uses.

LGNSW acknowledges the objective to streamline low-impact development and support faster assessments, but councils have expressed concerns that the proposed list is broad and includes development types with potential local impacts which may warrant notification or exhibition because of their amenity impacts (privacy, noise, traffic, overshadowing) and/or local concern or interest.

Exemptions to exhibition should apply where impacts are demonstrably low and predictable, development is genuinely minor in scale and scope and unlikely to generate community concern and that there are no variations or departures from controls or site-specific sensitivities (e.g. heritage, environmental risks, constrained lots). LGNSW would like the CPP to provide flexibility for councils to have discretion to exhibit certain applications that council considers to be higher-impact in the local context or potentially contentious applications or respond to local sensitivities and community expectations.

Residential Flat Buildings (RFBs) and shop top housing

LGNSW recommends removing the exemption category in Table 6 of the draft CPP applying to RFBs and shop top housing.

Councils have a particular concern with the proposal to exempt residential flat buildings and shop top housing as proposed in Table 6 of the draft CPP. These developments can have significant local impacts even when compliant and often generate strong community interest. Exempting them from exhibition risks undermining confidence in the planning system and removes a key opportunity for community input.

The CPP should be amended to remove these development types from Table 6 ensuring that medium-density and higher-density residential development such as this are publicly exhibited.

Recommendation 8:

That the CPP makes clear the circumstances or considerations as to when minimum exhibition timeframes can be extended on a case-by-case basis as noted in Table 5.

Recommendation 9:

That the CPP is amended to remove residential flat buildings and shop top housing from Table 6, allowing these developments to be publicly exhibited.

Community engagement terminology

LGNSW is concerned that the community's understanding of requirements of public exhibition under the EP&A Act may be confused with community engagement activities required under the LG Act. The terminology and legal requirements of the defined terms vary significantly and may differ from to general public understanding of these nuances. The exhibited documents use a variety of terms, such as notification, participation, engagement and exhibition, some of which may overlap, or be confused with prescribed activities under various environmental Acts and Regulations which have a defined legal process and duration. This may create uncertainty for community members about when, how and whether they are able to comment on a proposal i.e. whether a particular stage is intended only to inform rather than invite input.

Community confidence in the planning system depends on people feeling they have a fair opportunity to know about proposals and have their say. If the final CPP is perceived as limiting that opportunity, there is a risk it could undermine trust, damaging the social licence for growth and density.

The NSW Government has indicated it will revise the OLG Integrated Planning and Reporting Guidelines and Handbook (2021) and prepare a guidance document to sit alongside the final CPP on best practice engagement methods. This presents a timely and important opportunity to clarify terminology, address potential confusion and better align the statewide CPP with councils' existing obligations under the LG Act.

Recommendation 10:

That the NSW Government commit to a timely and jointly coordinated approach to any proposed updates and changes to the Office of Local Government's Integrated Planning and Reporting Guidelines and Handbook, so that terms and definitions of engagement strategies are universally understood and incorporated into the Statewide Community Participation Plan.

Other comments

HDA, SSD and concurrent rezonings

Currently, State Significant Development (SSD) applications declared through the Housing Delivery Authority (HDA) that include a concurrent rezoning are exhibited for just 14 days. This is concerning, given the vast majority – around 80 per cent – of HDA applications propose rezoning alongside development.

This 14-day timeframe is inconsistent with the draft CPP, which proposes 28 days for planning proposals. It means that proposals seeking the same legal effect (i.e.) amending a statutory land use plan) are subject to different community engagement standards depending on the assessment pathway used.

At the LGNSW 2025 Annual Conference, councils resolved that HDA projects involving concurrent rezonings should be exhibited for a minimum of 28 days⁸. These SSDs often involve significant and unanticipated upzoning, with implications for infrastructure demand, built form, and community expectations. A 14-day exhibition period is insufficient for meaningful participation by councils and communities. It limits informed engagement, risks poorer-quality submissions, and may allow unresolved issues to persist later in the process, undermining trust in the planning system.

SSDs with concurrent rezonings are, in effect, performing the same function as planning proposals by amending statutory controls in Local Environmental Plans (LEPs). There is therefore a strong basis for aligning exhibition requirements. A consistent 28-day exhibition period for HDA declared SSD concurrent rezonings would align with the draft CPP and better reflect the scale and impact of these

⁸ Resolution 2A (7) - [Annual_Conference_2025-Resolutions.pdf](#)

proposals. It would also improve transparency and support better outcomes without substantively delaying assessment.

Recommendation 11:

The CPP should be amended to include a 28-day minimum exhibition period for SSD applications with concurrent rezonings, to make this consistent with the proposed 28-day exhibition of planning proposals.

SEPP/EIE and consultation on policies and guidelines

Transparency of decisions not to exhibit

The draft CPP states that a draft Explanation of Intended Effects (EIE) for a SEPP “*may be exhibited unless decided otherwise due to the urgency, scale or nature of the proposal*”⁹.

LGNSW considers this creates insufficient transparency and accountability in circumstances where a decision is made not to consult. The criteria of “urgency, scale and nature” are not defined in the CPP, nor is there any guidance on how they will be interpreted or applied in practice. There is also no requirement to publish or document decisions where a SEPP change is made without an EIE being exhibited (such as the reasoning for the decision and whether alternative consultation was undertaken.) This could effectively allow significant policy changes (including state-led rezonings via SEPPs) to proceed without a clear, transparent justification for bypassing public consultation.

LGNSW would like to see the CPP strengthened to clarify these matters. These improvements would better align with the CPP’s stated objective of transparency and community confidence in decision-making.

Exhibition timeframes for plans and policies

The draft CPP generally proposes a 28-day exhibition period for many plans and policies, including non-legislative policy documents (unless varied). While this provides consistency, LGNSW submits that 28 days is often insufficient for meaningful council engagement - particularly for substantive or system-wide policy reforms, such as those which are currently underway.

To ensure councils can provide considered, representative and high-quality feedback and support better policy outcomes, LGNSW requests that the draft CPP adopt a minimum 6-week (42-day) exhibition period for major policy reforms, complex or system-wide changes and proposals with significant local government implications.

⁹ Table 1 of Draft CPP

To support this, the CPP should include clear guidance or criteria for when longer exhibition periods would apply (similar to proportionality principles elsewhere in the document).

Recommendation 12:

That the CPP be strengthened to clearly define or provide guidance on the application of “urgency, scale and nature” in relation to SEPP changes and EIE exhibition.

Recommendation 13:

That the CPP be amended to adopt a minimum 6-week (42-day) exhibition period for major policy reforms, complex or system-wide changes and proposals with significant local government implications, including guidance or criteria for when these longer exhibition periods would apply.

Use of AI in community engagement

Digital tools, including emerging uses of AI, are increasingly being adopted to support the planning system¹⁰, including in community engagement by analysing submissions, identifying themes and improving efficiency. While this presents clear benefits, it also raises important considerations around transparency, accountability, equity and privacy, which are not yet explicitly addressed in the draft CPP. The CPP should acknowledge the growing use of AI and include clear guardrails (such as around transparency, human oversight, inclusive access and privacy protections) to ensure it strengthens, rather than undermines, trust in engagement processes.

Recommendation 14:

That the draft CPP be updated to recognise the growing use of digital tools and AI in community participation and include guidance and safeguards that support public confidence through transparency, equity and inclusivity, human oversight and privacy.

CPP implementation

Resourcing and implementation

Councils already undertake substantial early engagement as part of strategic planning processes and understand the effort required to reach diverse communities in meaningful ways. Effective early engagement is resource-intensive, requiring time, specialist capability, appropriate tools and tailored approaches to ensure participation is accessible and representative. If the proposed statewide CPP is to place greater emphasis on earlier engagement, including at master plan or precinct planning stages,

¹⁰ [Artificial intelligence in NSW Planning | Planning](#)

it is important to recognise that this may increase the resourcing burden on councils rather than reduce it.

While LGNSW supports better timing and earlier participation where it improves planning outcomes, this should not assume councils can absorb additional engagement responsibilities within existing capacity. Strengthening early engagement in a way that is genuine, inclusive and proportionate will require investment in capability and practical support. This includes guidance, templates and fit-for-purpose tools, as well as funding support for precinct-level and strategic engagement activities. Existing initiatives such as the Regional Housing Strategic Planning Fund¹¹ and past State government funding to accelerate LEP updates¹² demonstrate the value of targeted support to help councils undertake the strategic planning work needed to respond to growth and housing pressures.

Recommendation 15:

That the NSW Government recognise the resourcing implications of strengthened early engagement requirements and provide councils with practical support (such as templates, tools, guidance) and targeted funding for precinct-level and strategic engagement activities.

Transitional arrangements

Transitional arrangements will be critical to ensure councils can move to the new CPP framework in a clear, consistent and practical manner. This includes allowing sufficient time for councils to update existing participation plans, align internal processes and systems, and resource any additional requirements without disrupting current engagement activities. Without clear and realistic transition provisions, there is a risk of inconsistency, duplication and unnecessary administrative burden.

Recommendation 16:

That the final CPP includes clear, staged transitional and savings arrangements, including defined timeframes, implementation guidance and support for councils, to ensure a realistic and well-resourced transition to the new framework.

¹¹ [Regional Housing Strategic Planning Fund | Planning](#)

¹² In 2018, the Accelerated LEP Review Program provided \$2.5m in funding for councils to review and update their LEP to reflect direction in the higher-level region plan.

Monitoring and review of CPP framework

The Discussion Paper proposes that the Department will monitor and evaluate its engagement activities against the measurable actions in the draft statewide plan with a review of timeframes within 12 months of the statewide plan being published¹³.

LGNSW supports monitoring and evaluation of engagement activities and the proposed review of exhibition timeframes within 12 months, but considers the framework needs further detail to deliver meaningful improvements. This should include clear performance metrics, public reporting to support transparency, and formal input from councils to ensure practical insights inform ongoing improvements. To enable more robust, evidence-based assessment, consideration should also be given to extending review arrangements beyond an initial 12-month period (for example an ongoing review cycle of 2–3 years).

Strengthening the monitoring and review framework in this way will help ensure the CPP remains responsive, evidence-based, and capable of supporting meaningful community and local government participation.

Recommendation 17:

That the CPP include clear performance measures, a commitment to regular public reporting, and structured council input into evaluation processes, alongside an initial 12-month review of timeframes followed by an ongoing review cycle.

Conclusion

LGNSW supports the NSW Government's intent of establishing a single statewide Community Participation Plan with the aim of providing greater consistency, certainty and transparency across the NSW planning system.

Consistency must not come at the expense of local flexibility, place-based decision-making and effective community engagement outcomes. Councils are a trusted, place-based level of government and must remain central to the design and delivery of community participation.

Of prime concern to councils is the potential to reduce or remove exhibition at later statutory stages, especially for planning proposals and rezonings, where the community has an established expectation of opportunity to comment. Early engagement at strategic phase serves a different purpose and interest to statutory consultation and cannot replace the requirement for ongoing and meaningful engagement with the community as prescribed in the objects of the EP&A Act.

¹³ Draft CPP, p 16

Community confidence in the planning system depends on people feeling they have a fair opportunity to know about proposals and to have their say. If the final framework is perceived as limiting that opportunity, there is a risk of undermining public trust and damaging the social licence for density done well.

LGNSW supports a proportionate approach to participation in principle, but only where it is applied transparently and does not reduce engagement for proposals with significant impacts, strong community interest or statutory significance. For example, the proposal to remove exhibition and notification for higher-risk developments such as residential flat buildings and shop top housing is not supported, as these can have impacts that extend well beyond immediately adjoining properties.

To be workable in practice, the final CPP should be supported by clear guidance and criteria, appropriate resourcing for councils, staged implementation arrangements, and a robust monitoring and review framework.

In summary, this submission is supportive of the intent of moving to a statewide community participation plan and LGNSW's recommendations seek to clarify, guide and improve the proposed shift in how the community has participated in long-established planning processes to ensure we uphold the principles of meaningful public engagement.