

DRAFT SUBMISSION

Variations and changes to complying development

Explanation of
Intended Effect (EIE)

June 2026



TABLE OF CONTENTS

Executive Summary	3
Recommendations	4
Opening	6
The Importance of Strategic Planning and the Role of Complying Development	6
Variation Certificate Process and Assessment Framework	10
Scope of Variations	14
Conclusion	16

NOTE: This submission should be read together with the '**Low-rise housing reforms and targeted assessment**' LGNSW submission.

EXECUTIVE SUMMARY

LGNSW supports initiatives that improve housing delivery and streamline approvals for genuinely low-risk, low-impact development. However, any expansion of the complying development framework, including the proposed variation certificate pathway, must preserve the integrity of strategic planning, local decision-making and community confidence in the planning system.

Councils play a critical role in translating strategic planning objectives into local controls, coordinating infrastructure delivery, managing cumulative impacts and responding to community expectations. While the proposed reforms aim to provide greater flexibility and reduce reliance on the development application pathway, LGNSW is concerned that, without appropriate safeguards, they may weaken the connection between development outcomes and established planning frameworks.

LGNSW supports a limited variation pathway only where it remains confined to objectively measurable, genuinely minor departures from complying development standards. Proposals involving broader planning judgement, local character, amenity, environmental impacts or cumulative impacts should continue to be assessed through merit-based pathways.

The proposed reforms will also create significant new responsibilities for councils as consent authorities. To ensure effective implementation, particularly as we transition to a new system, councils must be supported through realistic assessment timeframes, removal of deemed approvals, adequate cost recovery, investment in systems and staffing, and clear communication regarding the respective roles of councils and private certifiers.

LGNSW's recommendations seek to ensure that the proposed reforms improve efficiency without compromising strategic planning outcomes, consent authority accountability, infrastructure coordination, public trust or council resourcing and finances. LGNSW looks forward to working collaboratively with the NSW government to develop detailed legislative and operational arrangements before implementation.

RECOMMENDATIONS

RECOMMENDATION 1

Protect the role of strategic planning and local frameworks

LGNSW recommends that any expansion of complying development or introduction of targeted assessment be expressly designed to complement - not bypass - local strategic planning, infrastructure sequencing, community-informed place planning and adopted local controls.

RECOMMENDATION 2

Keep complying development objective and measurable

LGNSW recommends that complying development remains limited to genuinely low-risk, low-impact and objectively measurable proposals. Proposals involving broader planning judgement, cumulative impacts, local character, amenity or environmental effects should remain within the development application (DA) pathway.

RECOMMENDATION 3

Ensure councils retain a meaningful and adequately supported role

LGNSW recommends that councils' role in any variation certificate or targeted assessment process be supported by clear statutory boundaries, realistic assessment timeframes, adequate resourcing, and workable operational safeguards so that planning integrity, accountability and community confidence are maintained.

RECOMMENDATION 4

Consultation on draft regulation prior to implementation

Before any further expansion of complying development, the NSW Government should work collaboratively with local government on the detailed regulation ensuring arrangements for compliance and enforcement, recovery of infrastructure contributions, resourcing, and the availability of suitably qualified certifiers are in place prior to the implementation of these reforms.

RECOMMENDATION 5

Variation timelines and deemed approval

Existing timelines should be expanded to ensure the consent authority has time to conduct a thorough fit-for-purpose assessment of any variation application, including where site visits are necessary, and remove deemed approvals, in line with community expectations. LGNSW suggests 15 working days where a private certifier is responsible for the complying development certificate (CDC), and 25 working days where councils are responsible for both the CDC and the variation.

RECOMMENDATION 6

Community information on variation certificate processes

The implementation roadmap should include a program of clear and accessible communication to communities to ensure a shared understanding of the distinct roles and responsibilities of private certifiers and councils when acting as consent authorities in the CDC variation process, reducing confusion and improving transparency.

RECOMMENDATION 7

Impact on local government operations and resources

The NSW Government will need to provide adequate and explicit funding, systems support and transition assistance to ensure the reforms do not impose additional unfunded burdens on local government or undermine service delivery in other core planning functions. A roadmap of reform should be provided detailing the implementation strategy and key timelines.

RECOMMENDATION 8

Compliance Levy on Complying Development Certificate applications

LGNSW calls on the NSW government to amend the Environmental Planning and Assessment Regulation 2021 to enable councils to be reimbursed for their compliance and enforcement costs through implementation of a Compliance Levy on complying development certificate applications.

RECOMMENDATION 9

Fees and charges

LGNSW recommends that the NSW Government review the proposed CDC variation certificate fee structure in consultation with councils to ensure fees reflect the true cost of fit-for-purpose assessment, including site inspections, and provide full cost recovery for councils.

RECOMMENDATION 10

Number and scope of allowable variations

LGNSW recommends that the scope of any complying development variation pathway remain tightly confined. Only genuinely minor, low-risk and objectively measurable variations should be eligible, and the number of variations permitted for any one proposal should be capped at two (2) to ensure assessments can meet the proposed timeframes and prevent the CDC pathway from evolving into a quasi-development application (DA) process.

RECOMMENDATION 11

Metric only complying development standards

All complying development standards, including any standards capable of variation, remain objective, metric-based and readily assessed without the need for subjective judgement. The integrity of the CDC pathway depends on whether a proposal can be measured against clear numerical controls rather than broader design opinions or discretionary assessment.

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 *Variations and changes to complying development Explanation of Intended Effect (EIE)*.¹

Together with the *Low-rise housing reforms and targeted assessment Discussion Paper*², these proposed changes make up part of the substantive reforms to the *Environmental Planning and Assessment Act 1979* (EP&A Act) and *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) enabled by the Planning System Act 2025³.

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.

THE IMPORTANCE OF STRATEGIC PLANNING AND THE ROLE OF COMPLYING DEVELOPMENT

Importance of strategic planning to local government

Well-planned communities with homes for all is a key advocacy priority for LGNSW. Effective housing delivery depends on genuine collaboration between state and local government, evidence-based planning and the timely coordination of infrastructure. Councils are central to this task through preparing local plans and strategies, assessing development, sequencing infrastructure and responding to community expectations.

Councils translate regional and district planning objectives into zoning, place-based strategies, contributions frameworks and local infrastructure priorities. This role is essential to ensuring growth occurs in appropriate locations, with the services, open space, transport capacity and community support needed to deliver sustainable housing outcomes.

LGNSW is concerned that the cumulative expansion of complying development, including the variation pathway proposed in this EIE, could weaken the connection between development outcomes and adopted strategic planning frameworks if not carefully confined. LGNSW supports streamlining genuinely low-risk, low-impact development, but reforms should complement – not bypass – local planning processes, infrastructure planning and community-informed place outcomes.

¹ <https://www.nsw.gov.au/have-your-say/variations-to-complying-development>

² [Targeted Assessment Discussion Paper](#)

³ [Planning reforms | Planning](#)

LGNSW position on strategic planning

The LGNSW Policy Platform⁴ reflects the collective position of councils across NSW and emphasises strategic planning, local input and transparent decision-making. LGNSW's advocacy is grounded in the principle that growth should be planned, infrastructure-supported and responsive to local circumstances.

Impact of Housing Delivery Authority on strategic planning

The Housing Delivery Authority (HDA) is now enshrined in legislation and empowered to override local planning controls. It can bypass existing established pathways for making or amending environmental planning instruments (EPIs), including rezonings, without the same level of public consultation, council-led strategic assessment or local democratic oversight.

The strong rezoning focus of many HDA applications risks undermining confidence in adopted strategic plans. LGNSW remains concerned about state-led mechanisms that bypass local plans, strategic sequencing and community-informed planning.

Steps prior to implementation

Councils have consistently identified implementation issues that should be addressed before any further expansion of the complying development certificate (CDC) pathway. These include compliance and enforcement responsibilities, recovery of unpaid infrastructure contributions on privately certified development, shortages of registered certifiers, particularly in regional and rural areas, and the need for workable digital and administrative systems.

Any further CDC reform should therefore proceed cautiously, with genuine collaboration with local government, clear operational safeguards, sufficient lead time, full cost recovery and adequate implementation support.

Complying development

LGNSW recognises the value of complying development as a streamlined pathway for straightforward, genuinely low-risk and low-impact proposals. However, any expansion of this pathway should remain tightly confined to clear, measurable and minor departures so that it complements, rather than displaces, strategic planning, local controls and merit assessment where broader impacts may arise.

The EIE proposes that councils retain a role in determining variation certificates, which LGNSW supports as an important safeguard. However, that role must be meaningful in practice and supported by clear statutory tests, realistic timeframes, adequate resourcing and full cost recovery. Without these safeguards, the CDC pathway risks evolving into a quasi-merit process without the transparency and accountability of the DA system.

Background to Codes SEPP and complying development

Complying development was introduced as a fast-tracked approval pathway for straightforward development assessed against objective standards. Over time,

⁴ [Policy Platform | LGNSW](#)

successive state governments have expanded the range and complexity of development permitted under the Codes SEPP. The proposed variation certificate pathway continues that trajectory by allowing flexibility for minor non-compliances and reducing referrals to the DA pathway.

LGNSW supports that objective only where the pathway remains anchored to low-risk, low-impact development, with variations limited to precise, measurable matters suitable for code-based assessment. While the EIE states that environmentally sensitive and other excluded land will remain outside the CDC pathway, careful boundaries are needed to avoid progressively weakening local planning frameworks.

Role of local government and complying development

Councils carry much of the practical responsibility for managing local impacts from development approved through the CDC pathway, including responding to complaints and compliance issues where approvals are issued by private certifiers. For this reason, the proposed variation pathway must not blur the boundary between complying development and merit assessment. Proposals that raise broader questions of streetscape, amenity, environmental impact, local character or cumulative change should remain within the DA system, where councils can undertake a fuller and more transparent assessment.

Intersection with the Targeted Assessment Pathway

LGNSW considers that the proposed targeted assessment pathway should operate as a distinct middle pathway between complying development and a full development application, rather than as an extension of complying development by another name. The discussion paper positions targeted assessment as a mechanism for low-impact proposals that cannot satisfy the strict, objective requirements of a CDC but do not warrant full merit assessment.

In practice, councils may face increased pressure to assess proposals that are currently filtered out of the CDC pathway, particularly where applicants elect targeted assessment instead of redesigning to achieve compliance. This has important implications for council resourcing, workflows, systems and accountability. It will be critical that the boundaries between CDCs, targeted assessment and full DAs remain clear, and that councils are adequately resourced to administer any new pathway without undermining existing assessment functions.

Strategic planning must remain the foundation of the planning system. Any expansion of complying development or new assessment pathway should reinforce adopted local and regional strategies, infrastructure alignment and community confidence in planning decisions.

RECOMMENDATION 1

Protect the role of strategic planning and local frameworks

LGNSW recommends that any expansion of complying development or introduction of targeted assessment be expressly designed to complement - not bypass - local strategic planning, infrastructure sequencing, community-informed place planning and adopted local controls.

RECOMMENDATION 2

Keep complying development objective and measurable

LGNSW recommends that complying development remains limited to genuinely low-risk, low-impact and objectively measurable proposals. Proposals involving broader planning judgement, cumulative impacts, local character, amenity or environmental effects should remain within the DA pathway.

RECOMMENDATION 3

Ensure councils retain a meaningful and adequately supported role

LGNSW recommends that councils' role in any variation certificate or targeted assessment process be supported by clear statutory boundaries, realistic assessment timeframes, adequate resourcing, and workable operational safeguards so that planning integrity, accountability and community confidence are maintained.

RECOMMENDATION 4

Consultation on regulation prior to implementation

Before any further expansion of complying development, the NSW Government should work collaboratively with local government on the detailed regulation ensuring arrangements for compliance and enforcement, recovery of infrastructure contributions, resourcing, and the availability of suitably qualified certifiers are in place prior to the implementation of these reforms.

VARIATION CERTIFICATE PROCESS AND ASSESSMENT FRAMEWORK

Variation timelines and deemed approval

The EIE's proposed changes to complying development would require councils to issue 'variation certificates' within strict timeframes (within 10 days, or 20 days if the council is also assessing the complying development certificate), after which time the variation will be deemed to be approved. This is a challenging and potentially unreasonable expectation for many councils across NSW, given current skills shortages and with no indication of measures to fund this work. Councils are expected by the community to act as the consent authority and, as such, must undertake a thorough assessment commensurate with the scope and impact of the proposed variation, rather than a purely procedural review.

Even where a proposed variation is characterised as minor, councils must still be able to verify that it is minor in practice and in its site context. Some impacts cannot be reliably assessed from plans alone, particularly where there are questions about slope, streetscape presentation, adjoining development, access, drainage, trees, privacy, overshadowing or other physical site conditions.

In practice, some applications may require a site visit, and 10 days is unlikely to provide sufficient time for that to occur, particularly where further information, internal coordination or senior oversight of an assessor's recommendation is required before an approval can be issued. A site visit does not convert the process into a full merit assessment; rather, it is a proportionate safeguard that enables the consent authority to confirm that the proposal remains suitable for the streamlined pathway. Without sufficient time to undertake that basic verification where needed, there is a risk that matters described as 'minor' may have greater local impacts once implemented, undermining community confidence in the variation certificate process.

These compressed timeframes therefore create governance, legal and reputational risks for councils, especially if a matter is not assessed within 10 days and is instead deemed to be approved. That outcome represents an even more significant risk to planning integrity and community confidence. Deemed approvals should be removed to ensure adverse outcomes are not the unintended consequence of a consent authority pushed to the limits of its resources.

LGNSW suggests a more reasonable timeframe for complying development variations is 15 working days where a private certifier is responsible for the CDC, and 25 working days where councils are responsible for both the CDC and the variation. This will ensure councils, as the consent authority, are able to accurately assess all aspects of a proposed variation including undertaking site visits where necessary, in line with community expectations.

Variation certificate split approval model

The EIE's proposed split approval model, where a private certifier issues the CDC and council determines the variation certificate, creates potential difficulties in accountability, process clarity and community understanding. Although decision-making functions may be divided in law, the community is likely to view the approval as a single outcome and hold council responsible for any adverse impacts that arise, particularly where councils are seen as the public authority associated with planning oversight. This arrangement may therefore be misleading or confusing for neighbours, who may not understand which body approved which aspect of the development or who is responsible for responding to concerns, complaints or compliance issues after approval is granted. The model also risks fragmenting assessment responsibility, blurring the lines of accountability and undermining confidence in the integrity and transparency of the CDC pathway.

Clear and accessible communication should be provided to communities to ensure they understand the distinct roles and responsibilities of private certifiers and councils when acting as consent authorities in the CDC variation process. This must be a key element of the implementation roadmap to help reduce confusion, improve transparency and support community confidence.

Impact on local government operations and resources

LGNSW acknowledges that the proposed model seeks to preserve council oversight by nominating councils, rather than private certifiers, to issue variation certificates. However, formal involvement alone will not ensure genuine accountability. For council oversight and accountability to be meaningful in practice, LGNSW recommends that any new assessment pathway, including targeted assessment⁵ and CDC variation certificates, must be supported by realistic statutory timeframes, no automatic deemed approvals, and clear statutory tests that preserve genuine council oversight and accountability. If councils are to perform an approval or review role within these pathways, that role must be properly resourced, supported by full cost recovery, and accompanied by investment in digital systems, administrative processes and staffing capacity.

The proposed reforms are also likely to create a significant administrative burden for councils, extending well beyond assessment itself to include new paperwork, record-keeping, workflow management, compliance coordination and additional community enquiries. Implementation may require new digital processes or substantial changes to existing IT and e-planning systems so councils can receive, track, assess and report on variation certificate and targeted assessment applications⁶ in a consistent and auditable way.

For many councils, particularly those already operating with limited staffing and constrained budgets, these additional responsibilities would place further pressure on existing teams and systems unless they are accompanied by realistic lead times, full cost recovery and practical implementation support. If councils are expected to

⁵ LGNSW Targeted Assessment Submission

⁶ LGNSW Targeted Assessment Submission

administer these reforms effectively, the NSW Government will need to support this change with adequate funding, systems support and transition assistance to ensure the reforms do not impose unfunded burdens on local government or undermine service delivery in councils' other core planning functions.

Compliance Levy on CDC applications

LGNSW's position on complying development is well-established in our Policy Platform⁷. While CDCs were originally intended for low-impact residential and commercial alterations and additions, the pathway has been progressively expanded to include more complex, high-value projects. The EIE and the targeted assessment discussion paper propose further expansion, with a goal of up to three-quarters of all applications being approved through CDCs.

To support this shift, longstanding compliance and enforcement issues experienced by councils must be addressed. Without resolution, these challenges are likely to intensify with the steady expansion of complying development. Councils need a mechanism to properly and fairly recover the costs of undertaking compliance activities, similar to the NSW Government's building work levy.⁸ This is a matter of significant concern to the local government sector, particularly in light of councils' current severe fiscal constraints.

LGNSW has consistently advocated for councils to be provided adequate powers, resources and cost recovery mechanisms to implement compliance. At the 2024 LGNSW Annual Conference, councils resolved to call for specific legislation to allow for the imposition of a Compliance Levy on CDC applications⁹. The NSW Government's planning system reforms¹⁰ reinstated a regulation-making provision in the EP&A Act that will allow a regulation to impose a compliance levy on CDCs. LGNSW recommends the NSW Government use this reinstated provision¹¹ to amend the EP&A Regulation 2021 and enable councils to be reimbursed for their compliance and enforcement costs.

Fees and Charges

The proposed fees, as stated in the EIE, do not adequately reflect the work necessary for councils to assess and determine variation certificate applications. Councils are expected to undertake a thorough fit-for-purpose assessment of the variation components, and introducing this additional function without full cost recovery would add to existing financial pressures.

Assumptions that increased complying development will reduce council workload overlook how councils are resourced in practice, with staffing based on projected demand across all assessment pathways. This concern is heightened by recent State reforms that have reduced local development applications for which councils received a fee to assess, while increasing councils' assessment inputs to state significant development (SSD) applications without a corresponding funding source.

⁷ [Policy Platform | LGNSW](#)

⁸ [Paying a building work levy for regulated buildings | NSW Government](#)

⁹ [2024 Conference Resolutions](#)

¹⁰ [Reforming the NSW planning system](#)

¹¹ [Section 4.64 \(1\)\(f1\) of the EP&A Act](#)

LGNSW suggests the NSW government further considers the fee structures proposed for CDC variations and works with local government to determine a scale and value of fee which better reflects the time and vigour required for assessment. We note that SSROC and others have proposed alternative fee determination methods and ask that consideration be given to further exploring a fee structure which can be supported by councils.

RECOMMENDATION 5

Variation timelines and deemed approval

Existing timelines should be expanded to ensure the consent authority has time to conduct a thorough fit-for-purpose assessment of any variation application, including where site visits are necessary, and remove deemed approvals, in line with community expectations. LGNSW suggests 15 working days where a private certifier is responsible for the complying development certificate (CDC), and 25 working days where councils are responsible for both the CDC and the variation.

RECOMMENDATION 6

Community information on variation certificate processes

The implementation roadmap should include a program of clear and accessible communication to communities to ensure a shared understanding of the distinct roles and responsibilities of private certifiers and councils when acting as consent authorities in the CDC variation process, reducing confusion and improving transparency.

RECOMMENDATION 7

Impact on local government operations and resources

The NSW Government will need to provide adequate and explicit funding, systems support and transition assistance to ensure the reforms do not impose additional unfunded burdens on local government or undermine service delivery in other core planning functions. A roadmap of reform should be provided detailing the implementation strategy and key timelines.

RECOMMENDATION 8

Compliance Levy on Complying Development Certificate applications

LGNSW calls on the NSW government to amend the Environmental Planning and Assessment Regulation 2021 to enable councils to be reimbursed for their compliance and enforcement costs through implementation of a Compliance Levy on complying development certificate applications.

RECOMMENDATION 9

Fees and charges

LGNSW recommends that the NSW Government review the proposed CDC variation certificate fee structure in consultation with councils to ensure fees reflect the true cost of fit-for-purpose assessment, including site inspections, and provide full cost recovery for councils.

SCOPE OF VARIATIONS

Number and scope of allowable variations

LGNSW recommends that the scope of any complying development variation pathway remain tightly confined. Only genuinely minor, low-risk and objectively measurable variations should be eligible, and the number of variations permitted for any one proposal should be capped at a low threshold to prevent the CDC pathway from evolving into a quasi-DA process. Variations involving matters such as local character, streetscape impacts, tree protection, environmental effects or other issues requiring broader planning judgement should remain within the DA or targeted assessment pathway.

Allowing up to four (4) variations to complying development standards, as proposed in the EIE, appears to be a considerable departure from the intended purpose of the CDC pathway and risks shifting it towards a quasi-merit assessment process without the transparency and safeguards of the DA system. While some limited flexibility may be appropriate for genuinely minor departures, a proposal involving four separate variations raises legitimate questions about cumulative impact and whether the development remains suitable for code-based approval in the interests of the community.

In LGNSW's view, a more appropriate approach is to limit the number of permissible variations to a maximum of two (2), with proposals exceeding that threshold required to proceed through a merit-based assessment pathway.

Metric only complying development standards

It is essential that all complying development standards, including any standards capable of variation, remain objective, metric-based and readily assessed without the need for subjective judgement. The integrity of the CDC pathway depends on whether a proposal can be measured against clear numerical controls rather than broader design opinions or discretionary assessment. If a standard or variation criterion cannot be consistently quantified, it is not well suited to code-based approval and should instead be considered through a merit assessment pathway.

This concern is illustrated by the EIE's example relating to garage door sizes (see extracts below), which proposes flexibility on small and narrow lots where the garage is integrated into the dwelling design and "it's not visually dominant". That phrase is inherently subjective and does not constitute a measurable planning standard. Unless such a criterion can be translated into a clear metric or other objectively verifiable test, it should not be included in a complying development variation framework.

4 Variations to complying development standards

4.1 Summary of the high -priority complying development standards being considered for variations

8. Maximum width of garage doors : The following variations are proposed:

- Variations are proposed to allow carparking setbacks to be varied from being 1m setback behind the building line to align with the building line.*

- *Changes are also proposed to increase garage door sizes on small and narrow lots where currently only a single garage may be permitted, where the garage is integrated into the dwelling design, it's **not visually dominant** and presents as a single driveway at property boundary.*

4.9 Maximum width of garage door opening and car parking requirements

*...The NSW Government is proposing to allow variations for attached double garages (with garage-door openings up to 5 m) for two-storey dwellings on lots with a width between 10 m and 12 m where a single driveway presents at the street boundary and tapers to the garage. **These variations would be subject to a merit-based assessment by council**, demonstrating that the garage **does not visually dominate** the streetscape, the garage is integrated into the dwelling design. This variation would apply to the Housing Code and for zones RU5, R1, R2, R3 and R4 under the Inland Code.*

Potential scope creep of development standards

There is a broader policy risk that the proposed CDC variation controls may, in practice, become the new default development standards rather than a limited exception pathway. If proponents can routinely seek additional flexibility through a variation certificate, many may have little incentive to design to the existing baseline complying development standards and may instead treat the expanded variation measures as the expected norm. Over time, this risks normalising departures from the original code settings and weakening the distinction between standard complying development and proposals that should properly require greater scrutiny. There is also potential for this to bleed into the DA pathway, with the new variation thresholds influencing applicant expectations and creating pressure for similar concessions in merit-based assessment processes.

RECOMMENDATION 10

Number and scope of allowable variations

LGNSW recommends that the scope of any complying development variation pathway remain tightly confined. Only genuinely minor, low-risk and objectively measurable variations should be eligible, and the number of variations permitted for any one proposal should be capped at two (2) to ensure assessments can meet the proposed timeframes and prevent the CDC pathway from evolving into a quasi-development application (DA) process.

RECOMMENDATION 11

Metric only complying development standards

All complying development standards, including any standards capable of variation, remain objective, metric-based and readily assessed without the need for subjective judgement. The integrity of the CDC pathway depends on whether a proposal can be measured against clear numerical controls rather than broader design opinions or discretionary assessment.

CONCLUSION

LGNSW supports measures that improve housing delivery and streamline approvals for genuinely low-risk development. However, any complying development variation pathway must remain tightly confined to minor, objectively measurable departures that do not undermine strategic planning, local controls or community confidence.

To ensure the reforms achieve their intended outcomes, councils must retain a meaningful role in assessment, supported by realistic timeframes, adequate resourcing, full cost recovery and clear operational frameworks. By implementing the recommendations outlined in this submission, the NSW Government can improve planning efficiency while maintaining planning integrity, local accountability and well-planned community outcomes across New South Wales.