

3 June 2025

Attention Planning Minister

**RE: Proposed statewide Community Participation Plan**

The Artarmon Progress Association (APA) is making a formal submission regarding the proposed statewide Community Participation Plan (CPP) being exhibited by the Department of Planning, Housing and Infrastructure, New South Wales which includes changes to how Councils consult on planning matters. This matter is of grave concern.

The APA welcomes the opportunity to comment on proposed 'improvements' to planning processes which enable sustainable development in local communities to meet the needs of future generations. The APA notes that State Significant Projects will be exhibited for 14 to 28 days, Regionally Significant Development for minimum 14 days, Local Development for minimum 14 days and Council Related Development Applications for minimum 28 days.

However, the APA is concerned that some proposals in the draft CPP will reduce the ability for communities to participate in decision-making by State and local governments. In several proposed changes, the decision-making process might be extinguished.

The areas of concern are outlined below:

**1) Development exempt from notification and public exhibition**

The APA is deeply concerned that a vast range of developments may be exempt from public exhibition and notification subject to the development being permissible in the relevant zone and meeting the relevant planning controls under a Local Environment Plan (LEP), Development Control Plan (DCP) and/or State environmental planning policies (SEPP) and not including a clause 4.6 variation.

These exempt developments include new single and two-storey dwellings, dual occupancies and attached dwellings, residential flat buildings and shop top housing amongst other significant developments. The APA considers this could be an inadequate method of assessing a proposal, as it sets aside any concerns the community or neighbours may have in terms of amenity impacts, overshadowing, overlooking, traffic, view loss etc. which are not numerical compliance parameters but are expressed within the outcomes sought by the relevant zone objectives.

To exempt these developments from public exhibition and notification will not encourage open debate with the community and goes against the spirit of the draft CPP.

Recommendation:

*The APA's submission is that all Development Applications (even if within the permissible limits in the zone) should be treated on par with the provisions of "Local Development" in the draft CPP, i.e. Development Proposals should be exhibited for a minimum of 14 days.*

*Alternatively, those developments exempt from notification and public exhibition should be assessed on-site by local council officers. Council's decision (including photographic evidence of decision logic) must be published on council's website and notified to immediate neighbours within 7 days of the decision and at least 21 days prior to commencement of works.*

## **2. Removing requirement to re-exhibit master plans at the planning proposal stage**

The APA welcomes the inclusion of a standard 42-day public exhibition period for precinct plans, master plans, and structure plans where Council or the Department proposes changes to a precinct through rezoning.

However, the APA is concerned about the removal of requirements to re-exhibit these plans at the planning proposal stage as this is the stage when the community gets a closer look at the proposed 'final' changes.

Recent experience with the Secretary's Environmental Assessment Requirements (SEARs) process for a major local development, the Build to Rent proposal for the Chatswood Dive Site on the corner of the Pacific Highway and Mowbray Road has highlighted the need for local community involvement at various stages of a proposal, not just at the master plan or precinct plan stage. Specifically, undertaking holistic development approaches rather than piecemeal site by site analysis, rigorous sampling of local traffic and infrastructure requirements and downgrading affordable housing requirements at the above site disregard legitimate community concerns, leading to longer term disengagement with planning proposals.

Recommendation: *The APA recommends that in addition to the standard 42-day public exhibition period for precinct plans, master plans, and structure plans, there should be provision for at least 21 days of public exhibition at the final planning proposal stage. This will enable local communities to participate in more informed discussions with relevant state government and council stakeholders, leading to better decisions overall.*

## **3. Notification requirements for complying development certificate (CDC) proposals.**

The APA notes that the draft CPP proposes to introduce a standard 7-day pre-commencement notice for CDC applications to streamline the process.

*Recommendation: While the APA is supportive of simplifying and streamlining notifications requirements for CDC proposals as these are limited scope of works compared to a Development Application (DA), the proposed 7-day notification might be insufficient for neighbouring properties to effectively plan for any disruptions. These disruptions could include temporary relocation (for elderly residents), changes to household routines to manage dust/noise from the proposed works and temporary loss of footpaths etc.*

*The APA recommends that a minimum of 14 days pre-commencement notice should be provided to immediate neighbours likely to be impacted by CDC proposals to allow sufficient time for adjusting routines, temporary relocations etc.*

## Conclusion:

The APA supports efforts to improve collaboration between State and Local Government to improve consistency, efficiency and clarity in planning processes across New South Wales. However, these reforms should not come at the expense of genuine community participation and transparency.

The proposed changes to notification, exhibition and consultation requirements risk diminishing opportunities for residents to engage in decisions that may have lasting impacts on neighbourhood character, amenity, infrastructure and quality of life.

Strong community participation should not be an impediment to good planning. In the APA's view it is a cornerstone of better planning outcomes, stronger public trust and more sustainable communities. The APA respectfully urges the Department to reconsider the proposed provisions outlined above and strengthen the draft Community Participation Plan to ensure that communities continue to have a meaningful voice in shaping the places where they live, work and raise their families.

Yours sincerely



Glenda Hewitt  
President  
Pres@artarmonprogress.org.au

*The Artarmon Progress Association, Inc. (APA) was founded in 1906 as a not-for-profit group and our objectives are to promote the welfare, physical and intellectual advancement of the suburb of Artarmon and the City of Willoughby, to protect the interests of the residents, and to encourage a keener spirit of citizenship and mutual help amongst residents. Our newsletter, the Artarmon Gazette, is distributed quarterly to over 5,000 homes and businesses in Artarmon. We regularly communicate with residents and act as a conduit between local residents and elected representatives on matters concerning our local community.*