

25 February 2026

NSW Department of Planning, Housing and Infrastructure  
14 Parramatta Square  
12 Darcy Street  
Parramatta NSW 2150

[Have Your Say Online Submission](#)

**Re: Cooks River Alliance response to ‘Have Your Say’ – draft ‘The Sydney Plan’**

To whom it concerns,

The Cooks River Alliance (the Alliance) is a partnership between Bayside Council, Inner West Council, Canterbury-Bankstown Council, Strathfield Council and Sydney Water. The Alliance’s purpose is to support whole-of-catchment management of the Cooks River by coordinating the resources, knowledge and expertise of its member organisations for the benefit of the local environment and community.

The Alliance welcomes the opportunity to provide feedback on the draft Sydney Plan. Consistent with our role and expertise, our review focuses on the importance of urban waterways in shaping the environmental, social and economic resilience of Greater Sydney.

Overall, the Alliance acknowledges the responsible and pragmatic intent of the draft Plan. We particularly welcome its recognition that the Sydney region is enriched by a diverse network of urban waterways, and that these natural assets must be protected and enhanced for the benefit of current and future generations. This perspective aligns with leading practice internationally, including guidance from the Resilient Cities Network, the World Water Council’s World Water Cities Forum, and ICLEI – Local Governments for Sustainability.

Notwithstanding this, the Alliance has identified several concerns that warrant further consideration in order to strengthen the final Plan:

**Affordable housing supply:** The urgency to increase housing delivery risks a shift from well-designed and genuinely affordable homes to inadequately planned, lower-quality housing. Such outcomes may generate longer-term social, economic and environmental challenges that undermine the intent of the Plan, including long-term undermined liveability, concentration of social disadvantage, overwhelmed sewage and flood management systems, and increased poverty due to rising insurance premiums and insurance retreat.

**Blue-green infrastructure and waterways:** The draft Plan does not yet provide sufficient guidance or actions to close the growing gap between Greater Sydney and other major Australian cities in realising the full potential of its urban waterways. This is particularly so for Sydney's waterways beyond Sydney Harbour. Examples such as Karrawirra Parri (River Torrens) in Adelaide, the Brisbane River, and Birrarung (Yarra River) demonstrate what is possible when waterways are elevated as core organising elements of urban resilience and vibrancy.

**Natural hazard management and climate resilience:** The draft Plan provides limited direction for responding to natural hazards and the increasing uncertainties associated with climate change, which may constrain Greater Sydney's ability to build long-term resilience. This reveals deeper issues in current NSW natural hazard management and climate resilience policy frameworks, which are either piecemeal (focusing only on specific regions) or inadequate (e.g. the NSW's Coastal Management Program that appears to exclude catchment processes outside the areas mapped as coastal zones).

To address these concerns and support the development of a more robust and integrated Sydney Plan, the Alliance has provided targeted recommendations relating to the following Response areas attached to this letter.

- Response 3: Secure the supply of affordable housing
- Response 5: Align infrastructure to planned growth
- Response 6: Create a more vibrant Sydney
- Response 7: Grow and connect public space
- Response 9: Minimise the impact of natural hazards to communities
- Response 12: Protect and enhance the natural environment

Yours Sincerely,



Dr Andrew Thomas  
Executive Officer, Cooks River Alliance.

Yours Sincerely,



Clr. Clare Raffan  
Chair, Cooks River Alliance.

CC:

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## The Cooks River Alliance's specific observations and recommendations to the draft 'The Sydney Plan'

### Response 3: Secure the Supply of Affordable Housing Cooks River Alliance – Observations and Recommendations

#### Our observations

The Cooks River Alliance acknowledges the urgency of addressing Sydney's significant housing shortage and recognises the commitment of our member councils to supporting increased housing supply across the region. However, we share growing concerns that the imperative to deliver housing at scale may inadvertently shift the focus from *genuinely affordable, well-designed homes* toward *quick and low-cost housing solutions*. Such an outcome risks embedding long-term social, economic and environmental problems across Greater Sydney.

When the drive to increase supply prioritises speed and cost over design quality and coordinated urban planning, housing outcomes can fall short of the standards required for long-term liveability. Poorly designed dwellings may provide inadequate natural light, ventilation, acoustic performance and thermal comfort, diminishing health and wellbeing and increasing household costs. At the neighbourhood scale, lower-quality development in areas lacking access to transport, services, open space and community facilities can entrench disadvantage, weaken social cohesion, and accelerate localised decline.

There are also significant infrastructure implications. Delivering higher densities or poorly planned development without appropriate upgrades can place additional pressure on sewerage, stormwater and transport networks. In some locations these systems are already operating at or near capacity. Overstretched networks increase the likelihood of system failures, local flooding, environmental degradation of waterways and costly emergency interventions. Such outcomes undermine broader city-wide goals for resilience, sustainability and environmental protection.

#### Our recommendations

The Alliance recognises that delivering affordable, well-located and well-designed housing is essential to supporting a cohesive, equitable and resilient city. To strengthen the draft *Sydney Plan*, **we recommend that Response 3 more clearly articulates the risks associated with poorly designed or poorly located housing and the importance of integrating housing delivery with infrastructure planning and place-based outcomes.**

To assist, the Alliance offers the following suggested text for consideration:

“To ensure affordable housing contributes positively to Sydney’s long-term liveability, development must be supported by high-quality design, appropriate location and adequate infrastructure capacity. Poorly designed or poorly sited housing can undermine place quality, reduce resident wellbeing and create ongoing financial burdens, while intensifying pressure on existing transport, sewerage and stormwater networks already operating at or near capacity. Ensuring that new affordable housing integrates with transport, open space and community infrastructure, and aligns with coordinated infrastructure planning, will support the creation of resilient, inclusive and sustainable neighbourhoods that meet the needs of current and future residents.”

## **Response 5: Align Infrastructure to Planned Growth**

### **Cooks River Alliance – Observations and Recommendations**

#### **Our observations**

The Cooks River Alliance supports the overall intent and measures outlined in Response 5. Ensuring infrastructure is sequenced appropriately to guide and support housing growth is fundamental to delivering resilient, healthy and well-functioning communities across Greater Sydney. We agree that infrastructure planning must be closely aligned with growth areas to avoid placing additional pressure on already stretched systems and to maintain the liveability of existing neighbourhoods.

However, we note that the response does not explicitly recognise the regional-scale nature of blue–green corridors and connected open space networks. These networks frequently traverse multiple local government areas and are foundational to achieving the Plan’s priorities for connectivity, active transport, ecological health and climate resilience. To maximise benefits under Priority *Connected*, it is important that the explanatory text acknowledges the need for early, coordinated planning across councils and State agencies to ensure these corridors function as integrated regional assets.

#### **Our recommendations**

To strengthen Response 5, **the Alliance recommends that the explanatory text include explicit reference to the importance of planning and coordinating blue–green corridors at a regional scale.** The following suggested wording is offered for consideration:

“Given that blue–green corridors and connected open space networks extend across the boundaries of multiple local councils, State Government leadership is essential to ensure cohesive planning, design and delivery. A coordinated, region-wide approach will strengthen ecological connectivity, support active transport links, improve access to open space and enhance resilience to heat and flooding. Embedding blue–green corridor planning into State-led infrastructure sequencing will enable consistent standards and investment priorities across LGAs, ensuring that these networks

function as integrated, city-shaping assets that deliver environmental, social and economic benefits for communities throughout Sydney.”

To complement this addition, **the Alliance recommends the inclusion of the following actions:**

**NSW Government Action 5.X:** Lead the identification, planning and coordination of regionally significant blue–green corridors to ensure consistent design standards, connectivity and infrastructure integration across multiple LGAs.

This action should involve aligning corridor planning with State-led infrastructure sequencing, prioritising investment where cross-boundary coordination is required, and embedding blue–green networks within broader strategies for resilience, open space, biodiversity and active transport.

**Council Action 5.Y:** Work collaboratively with neighbouring councils and the NSW Government to plan, protect and enhance local components of blue–green corridors, ensuring alignment with regional connections, local open space strategies and infrastructure planning.

This should include identifying opportunities to strengthen cross-boundary green links, support active transport networks, improve access to open space and enhance environmental resilience through coordinated planning and delivery.

## **Response 6: Create a More Vibrant Sydney**

### **Cooks River Alliance – Observations and Recommendations**

#### **Our observations**

The Cooks River Alliance strongly supports the intent of Response 6 to foster a more vibrant, active and culturally rich Sydney. However, the draft Plan does not currently acknowledge the distinctive and powerful role that Sydney’s urban waterways can play in achieving this goal.

Well-designed river and creek corridors can significantly enhance urban vibrancy by creating attractive public destinations and movement spines that support a wide range of social, cultural and economic activities. Healthy waterways provide settings for socialising, festivals, markets, outdoor dining, public art and cultural expression. They also support active transport networks, increase thermal comfort, enhance urban cooling, and strengthen community identity and sense of place.

Cities across Australia demonstrate the potential benefits of integrating waterways into vibrant urban life. The revitalisation of Karrawirra Parri (River Torrens) in Adelaide and the

activation of the Brisbane River show how waterways, when treated as central city-shaping elements, can anchor cultural institutions, stimulate local economies and support activity throughout the day and evening.

Despite these clear opportunities, and the draft Plan's broader recognition of Sydney's extraordinary network of waterways, Response 6 makes no explicit reference to their role in creating a more vibrant city.

### **Our recommendations**

To address this gap, **the Alliance recommends that Response 6 include a paragraph within the explanatory text that clearly articulates how urban waterways can contribute to Sydney's vibrancy.** The following wording is offered for consideration:

"Sydney's local urban waterways and rivers should be utilised to enhance the city's vibrancy by creating accessible, attractive and culturally significant public places. Restored river and creek corridors can support recreation, walking and cycling, community events and outdoor activity, while strengthening local identity and supporting nearby businesses. Integrating waterways into place planning through improved access, riparian planting and blue-green connections can create cooler and more comfortable environments that encourage activity throughout the day and evening. Elevating the role of waterways within the vibrancy agenda will unlock their social, cultural and economic potential while enhancing their environmental and resilience functions."

In addition, **the Alliance recommends including a case study within Response 6 to demonstrate this opportunity.** For example:

"The revitalisation of Karrawirra Parri (River Torrens) in Adelaide shows how integrating urban waterways into city-shaping can significantly enhance vibrancy, public life and cultural identity. Through the CBD, the river has been transformed from a degraded, flood-prone waterway into a public space that supports recreation, active transport, cultural events and everyday community use. Continuous paths, shaded riverside environments, and a series of high-quality public spaces attract activity throughout the day. Cultural institutions such as the Adelaide Festival Centre and Elder Park now front the waterway, using it as a setting for concerts, festivals and community gatherings. This transformation illustrates how treating waterways as core organising elements—rather than peripheral assets—can stimulate local business vitality, outdoor dining, tourism and a strong sense of place, offering lessons directly relevant to creating a more vibrant Sydney."

**The Alliance also recommends that Figure 38 be updated to incorporate the role of local waterways in enhancing vibrancy.** This could include elements such as:

- riverside paths
- shade trees and riparian planting
- seating and rest areas
- event and activity nodes
- waterside dining opportunities

- blue–green corridors
- bridges and lookouts
- First Nations cultural layers
- urban cooling functions

To support this update, we suggest drawing on inspiration from the NSW Government Architect’s Sydney Green Grid, the [Urban WaterGuide \(2022\)](#), and the [CRCWSC Guidelines Suite](#), which contain conceptual diagrams and design principles relevant to integrating waterways into vibrant public spaces.

Finally, to operationalise these opportunities, the **Alliance recommends including the following actions in Response 6:**

NSW Government Action 6.Y: Develop and implement a Waterways Activation and Access Framework to guide the integration of local rivers and creeks into vibrant centres and public spaces.

Council Action 6.X: Identify and plan for activation opportunities along local waterways, including improved access, riverside paths, public spaces, outdoor dining, cultural programming and connections to nearby centres.

## **Response 7: Grow and Connect Public Open Space**

### Cooks River Alliance – Observations and Recommendations

#### **Our observations**

The Cooks River Alliance welcomes the strong emphasis in Response 7 on improving public open space and acknowledges the NSW Government’s recognition of the significant inequities in access to quality open space across Greater Sydney. This inequity is particularly visible along the Cooks River, where communities closer to the coast enjoy high-amenity foreshore environments while many inland communities experience the river as a constrained, concrete-lined channel with limited greenery, reduced access, and fewer recreational opportunities.

We also commend the explicit acknowledgement that improving access to open space includes strengthening connections between waterways, green infrastructure, centres, public transport, walking and cycling routes and residential areas. This integrated approach provides a strong platform for enhancing liveability and supporting the health and wellbeing of current and future generations.

## **Our Recommendations**

While Response 7 identifies the importance of public open space in infill areas, the Alliance considers that the current wording does not sufficiently articulate the transformative opportunities that redevelopment—particularly brownfield redevelopment—can provide. Redevelopment can create space for new forms of public open space and green infrastructure in locations where such opportunities have historically been limited.

Best-practice guidance is readily available to support this approach. For example, the [Government Architect NSW's "Greener Places"](#) framework provides detailed direction on integrating green infrastructure within dense urban environments, while the [Australian Institute of Landscape Architects' Urban Green Infrastructure Handbook](#) illustrates how green roofs, green walls and vertical greening can successfully be incorporated into constrained redevelopment sites. Together, these resources highlight the potential to turn infill development challenges into opportunities for delivering high-quality, connected and climate-responsive public spaces.

To make this opportunity clearer within the draft Plan, **the Alliance recommends strengthening the explanatory text under Response 7**. The following suggested wording is offered for consideration:

“In areas undergoing infill and brownfield redevelopment, opportunities should be identified to integrate green infrastructure within higher-density urban environments. This may include the provision of pocket parks, green roofs and walls, enhanced tree canopy, and improved connections to waterways and riparian corridors. Incorporating these elements will ensure that increased density continues to deliver accessible, high-quality open space, supports urban cooling and biodiversity outcomes, and strengthens the broader blue-green network that underpins a liveable and resilient Sydney.”

## **Response 9: Minimise the Impact of Natural Hazards on Communities** Cooks River Alliance – Observations and Recommendations

### **Our observations**

The Cooks River Alliance recognises the importance of Response 9 and its aim to minimise the impacts of natural hazards on communities. However, we have significant concerns about the adequacy of the current wording and the implications it may have for local government capacity, community safety and the overall resilience of Greater Sydney. The draft Plan notes that local councils are primarily responsible for understanding and managing flood risk. While councils play an important role, flood risk cannot be effectively understood or managed at a single-LGA scale. Flooding is fundamentally driven by

catchment processes, and almost all catchments in Greater Sydney span multiple local government areas. As a result, councils cannot fully meet their responsibilities without coordinated planning and leadership at the State level.

Local planning controls may assist in managing development within an individual LGA, but councils remain exposed to decisions, land-use changes and hydrological conditions upstream or elsewhere in the catchment, factors entirely outside their jurisdiction. Expecting councils to manage flood risk independently is therefore impractical and inconsistent with how catchments operate.

For this reason, the Alliance considers that State Government leadership is essential for understanding, mitigating and managing flood risk and other catchment-driven hazards. This is also consistent with the Australian Constitution, which places primary responsibility for managing natural hazards with State and Territory Governments.

The Alliance is also concerned that many high-risk local government areas, including Bayside and the Inner West, have not yet been prioritised for Disaster Adaptation Plans (DAPs) by the NSW Reconstruction Authority. These areas are already experiencing recurrent inundation and flood impacts, which are expected to worsen under climate change. Similarly, we note that both DAPs and Coastal Management Programs (CMPs) insufficiently address the way catchment processes influence coastal environments, including sediment transport, water quality, freshwater inflows, estuarine health and the behaviour of coastal flooding.

As currently drafted, the flood management guidance in Response 9 does not adequately respond to these catchment realities and may constraint the ability of the Sydney Plan to achieve its intended natural hazard resilience outcomes.

### **Our Recommendations**

The **Alliance recommends that the NSW Government revisit elements of the former Design and Place State Environmental Planning Policy (SEPP)**, or ensures that its core principles are reflected in the final Sydney Plan, particularly those related to integrated risk management, climate resilience and catchment-scale planning.

To strengthen Response 9, **the Alliance offers the following recommended actions:**

**NSW Government Action 9.X:** Establish an ongoing program to understand and manage flood risk at the landscape catchment scale, building on recent Floodplain Management Programs. This will support local councils by providing consistent, catchment-wide data and guidance to inform local planning decisions.

**NSW Government Action 9.Y:** Review the practical limitations of Coastal Management Programs that do not adequately account for catchment processes beyond the coastal zone,

and identify mechanisms to address issues relating to water quality, hydrology, aquatic health, riparian and littoral habitat, and natural hazard risks.

## **Response 12: Protect and Enhance the Natural Environment** Cooks River Alliance – Observations and Recommendations

### **Our observations**

The Cooks River Alliance supports the overall intent of Response 12, which appropriately recognises the need for long-term planning to protect and enhance Sydney’s waterways, biodiversity, bushland, rural lands and connected green corridors. We also welcome the acknowledgement that urban planning and development can create opportunities to restore natural systems and improve environmental outcomes.

However, the explanatory text does not clearly articulate *why* investing in these natural systems is essential, nor does it explain how healthy waterways, green corridors and biodiversity directly support many of the broader priorities outlined in the draft *Sydney Plan*. The importance of integrated water cycle management (IWCM) and Water Sensitive Urban Design (WSUD) is mentioned briefly, but not emphasised to the level required for these approaches to meaningfully shape planning outcomes.

We also note a significant omission in the Government and Council actions for Response 12. Despite the draft Plan’s acknowledgement of the vital role that waterways play in supporting sustainable and resilient development, there are no actions dedicated specifically to their protection or enhancement. This lack of alignment between the Plan’s narrative and its implementation framework represents a material gap that should be addressed.

In addition, the final paragraph of Response 12 uses discretionary language, such as “should consider”, that mirrors the semantics found across several NSW planning and environmental instruments over the past decade. Such language has contributed to NSW falling behind other jurisdictions (notably Victoria) in embedding waterway health, green corridors and blue–green infrastructure within urban planning. Without stronger, directive wording, the draft Plan risks undermining its own ambitions for resilience, sustainability and liveability.

### **Our Recommendations**

To strengthen the explanatory text and clarify why investment in natural systems is essential, the **Alliance recommends including the following introductory paragraph within Response 12:**

“Enhancing waterways, biodiversity, bushland and green corridors is critical because these natural systems underpin urban resilience, improving water quality, reducing flood and heat risks,

supporting ecological health, and providing clean air, shade and cooling. Strengthening these elements also directly supports other Sydney Plan priorities by making communities more liveable through comfortable public spaces, healthier environments and access to nature; by supporting connected, walkable corridors that link homes, jobs and centres; and by ensuring long-term sustainability that underpins economic prosperity, housing delivery and infrastructure efficiency.”

To provide clearer policy direction, **we also recommend strengthening the final sentence of the explanatory text as follows:**

“Planning approaches *must account for* ecosystem health, wastewater and stormwater management, and ensure access to water for recreation by using government-approved tools and guidelines (e.g. the [Risk-Based Framework](#)) to determine appropriate integrated water cycle management, water sensitive urban design and landscape restoration approaches that reflect local environmental, social and economic conditions.”

This more directive language would provide councils and state agencies with a clearer mandate and help address duplication, inefficiencies and gaps identified in the NSW Water Quality Governance Roadmap, particularly those relating to the integration of land-use planning and water management. Strengthening this wording would also help NSW close the gap that has widened since 2011 between itself and other states in effectively harnessing the benefits of healthy natural systems to support urban resilience.

Finally, to ensure that the aspirations of Response 12 are reflected in meaningful implementation measures, **the Alliance recommends including the following actions:**

**NSW Government Action 12.X:** Establish and fund a program to apply the Risk-Based Framework to urban catchments across Greater Sydney over the next decade, to ensure urban planning and development decisions are informed by robust catchment-scale assessments.

**Council Action 12.Y:** Work with the NSW Government to undertake the Risk-Based Framework for catchments within their local government areas and incorporate the outcomes into local planning instruments and strategic planning processes.