

8.9. NSW Planning Reforms

AUTHOR: Ben Boyd, Executive Strategic Planner

ENDORSED BY: Joseph Hill, Director City Strategy

ATTACHMENTS: Nil

PURPOSE:

To provide an understanding of the breadth of planning reforms that have recently been introduced, currently being undertaken and are to be implemented by the State Government.

EXECUTIVE SUMMARY:

The NSW planning system has been in a perpetual state of reform for more than a decade, but in the past year, a strong focus has been on responding to and recovering from the COVID-19 pandemic and accelerating reforms that attract investment, create jobs and keep the economy moving.

The rollout of the COVID-based reforms on top of larger reforms in the last 2 years, has been relentless with many being implemented with minimal warning and consultation. Councils across the board are struggling to analyse and constructively respond to the reform agenda let alone inform Councillors and the community in an accurate and timely manner.

This report provides an overview of the extent of reforms that have recently occurred and the changes that are likely to be proposed over the next several years.

FINANCIAL IMPLICATIONS:

There may be potential financial implications from the roll out of future planning reforms. However, the extent of these implications is difficult to determine due to a lack of detail.

RECOMMENDATION:

1. THAT the NSW Planning Reforms report be received.

LINK TO COMMUNITY STRATEGIC PLAN

The relationship with the Community Strategic Plan is as follows:

1. Our Living Environment
 - 1.1 Protected and enhanced natural environment and biodiversity
 - 1.2 North Sydney is sustainable and resilient
 - 1.3 Quality urban greenspaces
 - 1.4 Public open space and recreation facilities and services meet community needs

2. Our Built Infrastructure
 - 2.1 Infrastructure and assets meet community needs
 - 2.2 Vibrant centres, public domain, villages and streetscapes
 - 2.3 Sustainable transport is encouraged
 - 2.4 Improved traffic and parking management

3. Our Future Planning
 - 3.1 Prosperous and vibrant economy
 - 3.2 North Sydney CBD is one of NSW's pre-eminent commercial centres
 - 3.3 North Sydney is smart and innovative
 - 3.4 North Sydney is distinctive with a sense of place and quality design
 - 3.5 North Sydney is regulatory compliant

4. Our Social Vitality
 - 4.1 North Sydney is connected, inclusive, healthy and safe
 - 4.2 North Sydney is creative and home to popular events
 - 4.4 North Sydney's history is preserved and recognised

5. Our Civic Leadership
 - 5.1 Council leads the strategic direction of North Sydney
 - 5.2 Council is well governed and customer focused
 - 5.3 Community is informed and consulted
 - 5.4 Council's service delivery is well supported

BACKGROUND

In 2007, the State Government commenced a comprehensive review of the Environmental Planning and Assessment Act 1979 (EP&A Act), and accompanying Regulations with the view to improving the integrity and performance of the planning system. These comprehensive changes were outlined in a "Green Paper" and subsequent "White Paper", released in 2011 and 2013 respectively. The White Paper was accompanied the Planning Bill 2013 and Planning Administration Bill 2013, which comprised draft enabling legislation to support the implementation of a new NSW planning system. The comprehensive reform to the planning system ultimately failed to progress through the Upper House. The planning system has since been gradually

amended in a piecemeal fashion generally in accordance with the recommendations of the review.

This review represented the first major overhaul of planning laws since their introduction in 1979. The key regulatory changes examined in the Review included:

- **community participation** – the introduction of upfront community participation undertaken together with strategic planning;
- **strategic planning** – the introduction of a clear hierarchy of strategic plans to link state regional, sub-regional and local planning;
- **development assessment** – the introduction of a new development track known as code assessment;
- **infrastructure** – improved links between growth and infrastructure and a new framework for infrastructure contributions; and
- **building regulation** – the retention and expansion of the building certification system

In July 2018, the Department of Planning, Industry and Environment (DPIE) engaged Nick Kaldas (NSW Productivity Commissioner) to conduct an independent review of the governance of decision-making within the NSW planning system, with the view to identifying areas for improvement to ensure best practice against international standards, including in interactions between levels of government. In December 2018, the outcomes of the review were released, including 19 recommendations covering all aspects of the planning system. A copy of the review can be found here:

<https://www.planning.nsw.gov.au/-/media/Files/DPE/Reports/Assess-and-Regulate/compliance/review-of-governance-of-decision-making-in-the-nsw-planning-system-report-2018-12-18.pdf>

The DPIE accepted all 19 of the recommendations of the comprehensive review of the NSW planning system on 19 December 2018. DPIE has since commenced a series of works to address these endorsed recommendations.

In early 2020, the State Government embarked on a second wave of accelerated reforms in response to the COVID Pandemic. The primary premise behind these sets of reforms was to get the NSW economy “back on track” and were loosely based on introducing greater flexibility to keep development happening in light of increased social distancing and other Covid 19 requirements restrictions.

In August 2020, the Minister for Planning released the *Planning Reform Action Plan*, which aimed to attract investment, ensure ongoing job growth, reduce time and cost. In particular, it focuses on:

- reducing assessment times for planning proposals, regionally significant development applications (DAs) and major projects
- providing new resources for the Land and Environment Court

- reducing concurrence and referral cases between agencies
- expanding complying development, and
- accelerating precinct coordination.

A full copy of this Action Plan can be found here:

<https://www.planning.nsw.gov.au/Policy-and-Legislation/Planning-reforms/Planning-Reform-Action-Plan>

The principal reforms that have been implemented to date, include:

- amending the way that Sydney and regional planning panels work to improve efficiencies in the assessment and determination times of regionally significant development;
- introduction of a new 'Planning Delivery Unit' to progress priority planning projects, both development applications (DAs) and planning proposals, that may be 'stuck' in the system.

In March 2021, the Department of Planning, Industry and Environment (DPIE) released *2021 Planning and Public Space Outlook* (refer to Attachment 1) which identifies the extent of planning reforms being rolled out through 2021. A copy of this Outlook can be found here:

<https://www.planning.nsw.gov.au/-/media/Files/DPE/Brochures/Planning-and-Public-Space-Outlook-March-2021.pdf?la=en>

This report outlines the extent of proposed changes to the planning system over the next couple of years that have and will impact upon Council.

CONSULTATION REQUIREMENTS

Community engagement is not required.

DETAIL

1. Priority Assessment Program

In April 2020, the DPIE commenced the acceleration of a number of state significant development and state significant infrastructure applications and planning proposals with the view to delivering new dwellings and jobs, in response to COVID.

Accelerated State Significant and Development and State Significant Infrastructure applications in the North Sydney LGA included:

- Sydney Metro Victoria Cross Over Station Development;
- Scientia Project, Monte Sant' Angelo Mercy College;
- Western Harbour Tunnel; and
- Crows Nest Over Station Development.

Accelerated Planning Proposals in the North Sydney LGA included:

- 575-583 Pacific Highway St Leonards (Amendment 25 to North Sydney Local Environmental Plan (NSLEP) 2013);
- 23-35 Atchison Street, St Leonards (Amendment 27 to NSLEP 2013);
- 100 Christie Street, St Leonards (Amendment 28 to NSLEP 2013); and
- Crows Nest Metro Station State Environmental Planning Policy (SEPP).

DPIE are seeking more projects to fast track under this program. Council staff are not aware of any other applications identified for fast-tracking in the North Sydney LGA at the time of writing the report.

The DPIE are also publishing a list of likely approvals for the upcoming months on its website.

2. Reducing Assessment Timeframes - Planning Proposals

Over the next 6-9 months the DPIE will be seeking to reduce planning proposal assessment timeframes and streamline processes by:

- Developing new Local Plan Making Guidelines to provide clearer guidance to councils and proponents;
- Reviewing the Plan Making delegations to streamline gateway and determination processes;
- Working with councils to develop key improvements to the planning proposal process;
- Investigating improvements related to mapping and legal process finalization (implemented May 2021);
- Streamlining internal DPIE processes; and
- Reviewing and improving referral agency processes.

Part of the reforms also include the move to the lodgement of Planning Proposals through the NSW Planning Portal (also refer to section 10 of this report). Whilst DPIE made this system operational in March 2021, Council staff are having significant issues with regards to its roll out, given distinct the lack of information and instruction from the DPIE.

Overall, these reforms will have an impact on how Council staff assess and process planning proposals, the full impact of which are yet to be determined.

3. Reducing Assessment Timeframes – Major Projects

By July 2021, it is proposed implement a new *Rapid Assessment Framework* which aims to streamline the assessment of major projects, provide clear guidance on environmental impact assessment and introduce a new Registered Environmental Assessment Practitioners (REAP) Scheme to provide quality assurance for environmental impact statements (EIS). This should have a limited impact on Council's existing assessment processes.

4. Complying Development Reforms – Building Business Back Better

In March 2021, the State Government announced a suite of reforms to accelerate the delivery of projects, create jobs, and keep the economy moving through the complying development pathway. Four key areas were identified to encourage investment and job-generating development through strengthening complying development, and include:

- Enabling land use and business agility for retail, commercial and industrial development reducing barriers in utilising existing space.
- Optimising opportunities for industrial and commercial development.
- Neighbourhood centre activation, strengthening our increasingly important local networks.
- Streamlining the delivery of data centres to support networks.

These reforms are proposed to be implemented through an amendment to the Exempt and Complying Codes SEPP. These reforms were placed on public exhibition in April 2021 and are anticipated to be implemented in mid-2021.

Council staff prepared a submission in relation to these draft reforms to outline its concerns. In particular, whilst the overall intent of the proposed changes was generally supported, objection was made with regard to:

- the ability to set aside Council's 8.5m building height limit in the *IN2 Light Industrial* zone and allow buildings up to 15m in height;
- allowing some new types of activities (such as entertainment facilities and indoor recreation facilities) as permissible forms of development in the *B1 Neighbourhood Centre* zone without wider public consultation;
- the ability to increase hours of operation in the *B1 Neighbourhood Centre* zone without wider public consultation; and
- the absence of a definition of what comprises "minor external works", making it difficult to determine if such works would be appropriate in heritage conservation areas.

5. Employment Zones Reform

In response to significant technological advancements that have changed the way we live, work and recreate, there has been a need to review the current Business and Industrial zones to ensure that they can accommodate these changes.

In March and April 2021, the DPIE undertook preliminary consultation and held workshops with councils (including North Sydney) to gauge the views of preliminary changes before exhibition.

A draft package of reforms documents were publicly exhibited from Mid may until the end of June 2021, including an amendment to the Standard Instrument Local Environmental Plan (SI LEP). It is anticipated that the proposed amendment to the SI LEP will be implemented in September 2021. Councils will then be given until around mid-2022 to update their LEPs to align with the new SI LEP framework.

Significant amounts of staff time will be required to bring Council's LEP into line with these reforms. It is anticipated that there will be a reduction in the number of zones from which a council can choose and that the extent of mandated permissible uses within these new zones will be greatly increased.

6. Standard Conditions for certain types of development of consent

DPIE are currently preparing standardised conditions of consent for various development types. This work is being undertaken in stages. Work initially commenced in 2018 and was followed more recently by a second set of stakeholder consultation in late 2020 with more refined conditions for consideration. Council staff were involved in the stakeholder consultation sessions.

It is proposed to introduce the following types of standard conditions for local and regionally significant development:

- **Mandatory conditions:** these will be conditions that can be applied to all development types, to a particular development type or in specified circumstances
- **Model conditions:** these will be conditions that councils and planning panels should use to improve clarity, certainty and consistency across council areas.

Councils and planning panels will continue to be able to prepare bespoke conditions for site-specific issues that are not addressed by the standard conditions. It is expected that bespoke conditions will be used in limited circumstances.

The first stage relates to residential development. These were first introduced in mid May 2021 for councils to use as an opt-in basis until the Environmental Planning and Assessment Regulations are updated and some conditions become mandatory which is anticipated by 1 July 2021.

The second stage is currently underway for conditions relating to other types of non-residential development land uses. These standard conditions are anticipated to be delivered by late 2021.

7. Land and Environment Court Appeal Pathways for Planning Proposals

DPIE are exploring options for establishing a merit appeal right to the Land and Environment Court (L&EC) for proponent-led re-zonings.

The purpose of this reform is to allow a statutory path to the Court giving the opportunity to review the merits of some rezoning decisions at “arms-length” from the Government. The reform would also be consistent with the appeal rights for proponents that already exist for development applications. It is proposed to publicly exhibit any proposed reforms in late 2021.

Council staff have already made strong representations to the DPIE on this reform matter, during preliminary briefings with Council’s and stakeholders held since mid-2020. Of particular concern is that this new process will actually increase costs and time delays which is contrary to aims that the DPIE are trying to achieve. Council staff will continue to object to these reforms. There are also some significant hurdles with regards to the Court’s ability to determine policy based matters.

8. Public Spaces Legacy Program

This reform seeks to deliver State funding to councils for public space works where they can demonstrate significant improvements in average assessment timeframes for development applications. Council had the opportunity to apply for up to \$4.75million in funding to deliver better public spaces by the end of 2022.

Having met the first milestone to reduce assessment times of development applications, Council lodged a detailed proposal in March 2021 for the full funding amount to enable the acquisition of the Quarantine Depot at Berrys Bay and construction of a new play space in St Leonards Park. In May 2021, DPIE granted Council the full amount of funding to deliver its nominated projects.

9. Your High Street Program

In November 2020, the State government offered grants up to \$1 million were available for councils to deliver improvements to a high street in their area. The program supports the delivery of the Premier's Priority to increase the proportion of homes in urban areas within 10 minutes' walk of quality green, open and public space. The program aims to:

- Improve/increase number of uses over day and night
- Improve safety and comfort for people
- Improve local accessibility and connections
- Increase footfall and capacity for trade for businesses

Council was unsuccessful in its application to upgrade the Broughton Highstreet to deliver on part of the outcomes for the *Kirribilli Village Centre Public Domain Masterplan*.

10. Roll out of NSW Planning Portal Digital Services

In March 2020, the Minister for Planning outlined a mandate for all councils and registered certifiers in the Sydney Metropolitan, Illawarra, Central Coast and Newcastle areas to commence using the ePlanning Digital Services from 1 July 2020, and are to process 100% of planning applications (i.e. development applications and Complying Development, Construction, Occupation and Subdivision Certificates) this way from 31 December 2020.

Councils and registered certifiers in regional Local Government Areas are to commence using the ePlanning Digital Services from 1 January 2021 and are to process 100% of planning applications this way from 1 July 2021.

Council commenced the mandatory receiving and processing of relevant planning applications through the Planning Portal since 1 July 2020. The new system has imposed a number of additional administrative steps which effects Council's ability to deliver timely outcomes.

In March 2021, the Portal was amended to allow the lodgement and processing of planning proposals through the Planning Portal. This option has not yet been mandated for applicants and councils to use, despite informal requests from DPIE staff for Council to do so. There has been a distinct lack of consultation with councils regarding the introduction of this new planning proposal lodgement and processing system. This has resulted in Council staff expending significant amounts of time bringing itself up to speed with how to deal with the new system.

Council staff have already identified a number of significant issues with the planning proposal lodgement and process system which is adding to delays in the processing of planning proposals, contrary to the aims that the DPIE are trying to achieve.

In April 2021, the DPIE advised councils of proposed changes to the Planning Portal to enable the acceptance of administrative fees for the lodgement of various applications through the Planning Portal to assist with its ongoing maintenance. These fees are to be made directly to the DPIE at time of lodgement and are to commence on 1 July 2021 and relate to the following types of application:

- Modification of Development Consent
- Site Compatibility Certificate
- Construction Certificate
- Subdivision Works Certificate
- Occupation Certificate
- Subdivision Certificate
- Building Information Certificate
- Review of Determination of DA

- Lodgement of a Planning Agreement
- Application for a BASIX Certificate
- Certificate Registration for:
 - Complying Development Certificate
 - Construction Certificate
 - Subdivision Works Certificate
 - Occupation Certificate
 - Subdivision Certificate
- Payment of Development Contributions.

11. Review of COVID Temporary Measures

In the early stages of the COVID Pandemic the DPIE introduced a number of temporary planning measures to ensure the delivery of development and support business operations. These temporary measures were due to initially expire in September 2020, but were extended until March 2021 and again were extended to March 2022. The temporary measures included:

- Allowing retail premises, including supermarkets, to receive deliveries 24 hours a day;
- Ministerial Orders (see section below);
 - Vehicle sanitation stations;
 - Temporary cycleways
 - Extended construction hours for infrastructure work
 - Extended construction hours for non-infrastructure work
 - Increased flexibility for food trucks and “dark kitchens”
 - Temporary workers accommodation
 - Home business operating hours
- Enabling the public inspection of documents through the NSW Planning Portal;
- Enabling public meetings and public hearings of planning bodies to be held online;
- Amending the timing of local infrastructure contribution payments to later in the development process.
- Extending the time where a development consent “lapses”
- Clarifying with the legislations as to when “commencement” of a development consent occurs

Most recently, the extended construction hours have been wound back to pre-COVID times (i.e. no longer permitted on a Sunday or public holidays), to a reduced need to maintain social-distancing.

12. SEPPs Review

In 2017, DPIE commenced a comprehensive review of all SEPPs and Regional Environmental Plans (REPs) with the aim to consolidate and significantly reduce the number of planning instruments that need to be considered when considering a

development application. One primary focus was the consolidation of planning policies into broad subject issues (i.e. housing, environment etc) and insert some SEPP and REP matters into the Standard Instrument LEP.

Key changes that affect North Sydney are outlined in the following subsections.

12.1. Environment SEPP

In late 2017, DPIE exhibited an EIE for a proposed new Environment SEPP, for the protection and management of our natural environment. This SEPP proposes to simplify the planning rules for a number of water catchments, waterways, urban bushland, and Willandra Lakes World Heritage Property. It seeks to do this by consolidating a number of existing SEPPs into a single policy, transferring some provisions of existing SEPPs into the SI LEP and creation of new Section 9.1 Local Planning Directions where appropriate.

This reform has currently stalled, with particular issues regarding the transferring of the provisions under the Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 needing to be resolved, particularly given that there is an accompanying DCP.

12.2. Housing Diversity SEPP

In July 2020, the DPIE exhibited an Explanation of Intended Effect (EIE) for a proposed new (Housing Diversity SEPP that:

- consolidates three housing-related SEPPs
 - SEPP (Affordable Rental Housing) 2009;
 - SEPP (Housing for Seniors and People with a Disability) 2004;
 - SEPP 70 – Affordable Housing (Revised Schemes).
- amends some state-level planning provisions to support social housing developments undertaken by the NSW Land and Housing Corporation (LAHC) on government-owned land;
- introduces new definitions for build-to-rent (BTR) housing, student housing and co-living; and
- amends some state-level planning provisions, particularly for boarding house and seniors housing development.

Aspects relating to LAHC developments and BTR were made through amendments to the Affordable Rental Housing SEPP in December 2020 and February 2021 respectively. It is anticipated that the remaining aspects of this reform will occur by mid-2021.

Council staff lodged an unendorsed submission to the DPIE outlining its concerns with the EIE in September 2020 and wrote to the Minister for Planning in March 2021 in response to the introduction of BTR controls and their implications on Council's commercial centres.

12.3. Design and Place SEPP

In March 2021, the DPIE exhibited an EIE for the Design and Place SEPP. The SEPP seeks to put place and design quality at the forefront of development. The SEPP spans places of all scales, from precincts, significant developments, and buildings to infrastructure and public space. It seeks to implement a principle-based approach to guide the design and assessment of new development proposals of all kinds and all scales, to encourage innovation and a stronger focus on better outcomes.

The new SEPP will replace:

- SEPP 65 - Design Quality of Residential Apartment Development; and
- SEPP (Building Sustainability Index BASIX) 2004.

Following the early 2021 public exhibition of the EIE, it is proposed to publicly exhibit a draft legislative version of the SEPP in late 2021, including a revised Apartment Design Guide and a new Urban Design Guide, with finalisation of the SEPP anticipated to be completed by the end of 2021.

13. Infrastructure Contributions Reform

Following a number of recent Government led reviews into improving the NSW planning system, including the Kaldas Review, the DPIE released a package of reforms in relation to the infrastructure contribution system in April 2020 for public comment. The proposed reforms primarily seek to implement short term amendments with the view to make the system more transparent and easier to use.

Council made a submission in June 2020 outlining its general support in principle for the proposed changes, but identified a number of issues where the proposed changes are either not supported or require further clarification and or investigation, including:

- increased audit reporting by councils;
- ill-defined responsibilities between State and Local government;
- lack of definitions for a number of terms raised in the discussion paper;
- general administrative queries regarding the operation of infrastructure contributions that need further clarification ; and
- concerns around the continued capping of infrastructure contributions for residential development which do not take cognisance of the lack of funding available to Councils to provide infrastructure for growth considering the cap on Council rates under the Local Government Act.

These minor reforms leapfrogged a larger, broader scale review of the entire infrastructure contributions system which was completed by the NSW Productivity Commission in November 2020. The State Government accepted all 29 recommendations of the NSW Productivity Commission's Review in March 2021.

It is proposed to publicly exhibit wider scale reforms to the planning legislation in line with the recommendations of the NSW Productivity Commission in mid to late 2021 with the view to having the changes made in early 2022, with councils progressively implementing the new regime by late 2022.

14. Other Miscellaneous Reforms

14.1. Clause 4.6 – Variation of Development Standards

In April 2021, DPIE released proposed changes to clause 4.6 under the SI LEP. In particular, it was proposed to replace the current merit assessment test to simplify the process and to remove the ability to incorporate local exclusions from the clause.

Council staff made a submission to these proposed changes in May 2021. The submission outlined that whilst generally supportive of the intent of the proposed amendments to clause 4.6, there were a number of significant issues which require further consideration, including:

- The proposal will result in an increase in de facto rezonings occurring with no detailed assessment as to how it fits in with strategic outcomes;
- Ability to vary standards merely based on economic grounds is floored without consideration given to impacts arising from a change in built form character;
- The retention of local exclusions from the operation of clause 4.6 to ensure that long term strategic goals are achieved.

It is unclear as to when any future changes are to occur, but it is anticipated that any amendments are likely to occur in late 2021 or early 2022.

14.2. Standardised DCPs

Since 2007, the DPIE have identified their intention to introduce a standardised DCP, in a similar way to their standardisation of LEPs.

In mid-2018, the DPIE commenced a process to establish a standard, online format for DCPs drawing on new model provisions and a standardised format. Council was invited at this time to be part of a Reference Group to participate in the development of the Standard DCP format, definitions and model provisions. Council declined to accept this offer at the time due to the high volumes of work that was being undertaken at the time.

There has been no recent updates as to where this project is at. Despite any updates, it is anticipated that a draft standard template will be publicly exhibited before being formally adopted. Once implemented, it is uncertain how long councils will be given to bring their exercising DCPs into line with the new format. This has the potential to

require significant resources to bring Council's DCP into line with the new format, especially given the size of Council's DCP (approx. 700 pages long).

14.3. Natural Hazards Package

In April 2021, DPIE released a draft state-wide Natural Hazards package that encourages councils to consider natural hazard risk in strategic land use planning.

The Package includes:

- a draft Strategic Guide to Planning for Natural Hazards which highlights the importance of considering natural hazards to reduce the impact they have on communities; and
- a toolkit of resources to support strategic planning process and help plan-making authorities find the information and data they need.

The guide is intended to inform the preparation of regional, district and local strategic plans, planning proposals and other strategic planning activities, and:

- Sets out eight guiding principles to inform land use planning decisions and manage natural hazard risk;
- Identifies the natural hazards relevant to NSW that should be considered in strategic planning activities;
- Explains key concepts related to natural hazard risk management;
- Discusses at a high level, the connection to existing policies, acts, regulations, guidelines and responsibilities.

The anticipated impact from this reform package is considered minimal as has Council already considered many of these issues in its Local Strategic Planning Statement (LSPS), which then ensures it is considered at the planning proposal and DCP amendment stages.

14.4. NSW Heritage Act

In April 2021, a review of the NSW Heritage Act was commenced with the view to better managing and protecting heritage in NSW. In particular, it will look at the effectiveness of the Heritage Act and the NSW heritage regulatory system, along with heritage aspects of the Environmental Protection and Assessment Act 1979.

The Discussion Paper provides an overview of the current heritage system, considers some alternatives and poses some questions to assist with public consultation.

Following an assessment of submissions made to the Discussion Paper, more formal draft amendments to the Act will be made and be subject to further public consultation.

Council has already identified a need to undertake a comprehensive review of its heritage listings and forms an action under its LSPS. It may be prudent to delay this

review until after the Heritage Act has been amended, should it place a requirement on Council to undertake a duplicate review of its own heritage controls and listings.

Conclusion

As this report illustrates, the DPIE are continually rolling out a significant number of changes over a very short timeframe. This has increased time pressure on Council staff to remain responsive to normal workloads whilst retaining attention to such changes and reforms and provide considered and informed feedback.

Staff will continue to keep Councillors informed of upcoming reforms and the implications for Council. Due to the frequency and quantum of the reforms and the general lack of time to respond to draft proposals, it is not always possible to formally seek a Council endorsed position. Notwithstanding, Council staff will provide regular updates through the Councillor Bulletin.