



24 February 2026

Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124
Submission by email: dca-exhibition@dphi.nsw.gov.au

Dear Consultation Team

RE: Establishment of the Development Coordination Authority

The Australian Institute of Architects (the Institute) NSW Chapter welcomes the opportunity to comment on the NSW Government's consultation on the establishment of the Development Coordination Authority (DCA) and proposed related amendments to the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation) and related instruments.

The Institute supports reforms that improve coordination and reduce unnecessary complexity in the planning system. The proposed DCA, including a consolidated statutory inputs framework, a streamlined 28-day response timeframe, and a single point of government input on development applications, has the potential to address duplication and delays previously experienced across multiple agency requirements. However, to realise this potential, the DCA framework must embed design quality, transparency and rigorous assessment processes alongside procedural efficiency.

Coordination and Integration of Agency Inputs

The consolidation of statutory inputs through the DCA presents a significant opportunity to improve how agency advice is coordinated and resolved during development assessment. However, coordination must not compromise rigorous consideration of design quality and place outcomes.

The Institute recommends that:

- Design expertise is embedded within the DCA's coordination processes, rather than treated as secondary to statutory inputs. Agency representatives contributing to coordinated responses should hold appropriate built environment expertise, and the DCA should require minimum design competency, including design literacy, urban design and contemporary planning practice.
- Mechanisms are established to prevent lowest-common-denominator decision-making, including processes to evaluate whether technical requirements unnecessarily compromise broader place outcomes.
- A shared digital coordination platform is established to enable agencies to provide advice through a single interface and provide visibility of how differing agency positions are resolved.
- The role of referral agencies and infrastructure authorities is clarified, including how timely consultation will occur within proposed timeframes.
- The role of the Government Architect within the DCA is defined, particularly in relation to design quality oversight.
- Clear conflict resolution processes are established, including escalation pathways where agency advice diverges.

Timeframes: Certainty vs Quality

The proposed 28-day statutory timeframe for DCA and agency responses seeks to provide certainty and reduce delays in the development assessment process. While the Institute supports greater predictability, timeframes must allow adequate review of complex design, environmental and community outcomes.

Rigid deadlines risk prioritising speed over quality, particularly for:

- Consultation with Traditional Owners and alignment with the GANSW Connecting with Country Framework.
- Precinct-scale proposals.
- Applications with significant urban environment implications.
- Projects involving complex site conditions or multidisciplinary inputs.
- Applications with significant environmental impacts.
- Consideration of archaeological and built heritage.
- Applications involving significant built heritage or culturally significant places.
- Opportunity for consultation with the DCA is provided where alternative solutions maybe advantageous



A strict timeframe may also discourage agencies from seeking specialist external advice where required (e.g., bushfire consultants, accessibility experts, acoustic engineers).

The Institute recommends that:

- Flexibility for extensions be provided for justified complex proposals.
- Decision logs be maintained to demonstrate whether recommendations are based on thorough assessment rather than solely meeting statutory deadlines.

Fee Structure and Access to Quality Review

The proposed simplified fee structure aims to improve fairness and predictability in the planning system. The Institute recognises the importance of appropriate resourcing but notes that increased or consolidated fees may influence project economics and design outcomes.

The Institute recommends that:

- The relationship between fees and service delivery, including quality of advice and design input, is transparent and evidenced.
- Fee structures do not create pressures that undermine design quality, sustainability or community outcomes.
- Fee increases reflect an improved level of service.
- Equity impacts are considered so applicants in lower-value areas are not disproportionately affected.
- Fee levels do not discourage pre-lodgement engagement.

Transparency, Accountability and Reporting

Improved coordination must be supported by strong transparency and accountability mechanisms to maintain community trust and ensure quality outcomes.

The Institute recommends the DCA framework include:

- Publication of agency comments (except where security-sensitive).
- Annual reporting on DCA performance, including quality of design inputs and responsiveness to complex urban issues.
- Performance metrics that measure both timeliness and quality of outcomes.

- A mechanism for applicants to request clarification where coordinated advice is unclear or contradictory.
- Periodic independent audit of DCA decisions to assess design quality, rigour and alignment with strategic planning objectives.

Relationship to Strategic Planning and the Built Environment

The DCA is being introduced alongside broader reforms to the NSW strategic planning framework. Implementation should be considered in parallel with the Building Productivity reforms and the Building (Approvals and Practitioners) Bill, to ensure consistency and avoid unintended system complexity.

The DCA should demonstrate how coordinated advice aligns with endorsed structure plans, masterplans and strategic design work, avoiding unnecessary redesign or re-litigation of previously resolved principles. Technical inputs should not undermine established strategic urban design outcomes.

To support this alignment, the Institute recommends the regulatory framework explicitly acknowledge coordination of statutory inputs and includes consideration of built environment quality and strategic planning outcomes, including:

- net zero building objectives
- urban heat resilience
- biodiversity and tree canopy targets
- movement-and-place frameworks
- social and affordable housing outcomes
- whole-of-life building performance
- protection and adaptive reuse of built heritage and culturally significant places
- local industry participation.

Conclusion and Recommendations

The Institute supports the intent behind establishing the Development Coordination Authority but seeks further clarity on how the coordination framework will interact with



existing State Environmental Planning Policies (SEPPs) and other Environmental Planning Instruments (EPIs), including implications for planning controls, design outcomes and development assessment processes.

The Institute recommends that:

1. The DCA's remit explicitly include design quality and built environment outcomes.
2. Design expertise be embedded in coordinated agency responses.
3. Timeframes balance certainty with thorough review and allow complexity-appropriate extensions.
4. Fee structures transparently support quality assessment processes.
5. Robust transparency and reporting mechanisms be established to maintain accountability and public trust.

The Institute looks forward to continued engagement as these reforms progress and welcomes further discussion on how architectural expertise can support the effective implementation of the DCA within the NSW planning system.

Yours sincerely

A handwritten signature in black ink that reads "Elizabeth Carpenter".

Elizabeth Carpenter

NSW Chapter President

A handwritten signature in black ink that reads "Tammy Dickson".

Tammy Dickson

Executive Leader, NSW