PROCESS REVIEW REPORT

Independent Process Review of the Housing Delivery Authority

16 December 2025

Peter Duncan AM

Process Review Report

1. Executive Summary

The scope of this review (**the Review**) is to consider the processes of the Department of Planning, Housing and Infrastructure (**the Department**) in providing advice to the Housing Delivery Authority (**HDA**), with specific reference to the use of unauthorised software (**the Software**).

This includes considering and providing a view as to the integrity of that advice, and subsequent recommendations made by the HDA to the Minister of Planning and Public Spaces (**the Minister**).

The HDA is a panel, with the panel Chair and members appointed by the Minister or the Planning Secretary, as the case requires. The HDA panel currently has three members; the Secretary of the Premier's Department (Chair), the Secretary of the Department of Planning, Housing and Infrastructure and Chief Executive of Infrastructure NSW.

The purpose of the HDA is to implement the state-led determination pathway for major residential housing proposals and process rezonings to stimulate the timely delivery of new homes across Greater Sydney and NSW.

An expression of interest (**EOI**) process has been established that is used by the HDA. Developers can submit an EOI to the HDA for major housing developments above approximately $60 million in Greater Sydney and $30 million in regional NSW.

The HDA's role is to evaluate these proposals submitted through the EOI process and recommend to the Minister whether expressions of interest should be declared as State Significant Development (**SSD**). The HDA's functions do not include determination of SSD applications or further merit assessment of proposals.

On 31 October 2025, the Department received a report that unauthorised software was being used to support the preparation of reports (**Reports**) to the HDA. The Software utilised Artificial Intelligence (**AI**) to do this. The Software was not an authorised product and was located off the Department's IT system.

On 20 November 2025, the Minister was briefed, and he requested an independent review be undertaken.

AI refers to the development of computer systems capable of performing tasks that typically require human intelligence. The AI leveraged in the Software was at the simple end of the AI spectrum. It collated publicly available information from the public

database(s). It was not making any decisions or recommendations, nor was it undertaking assessments or authoring content.

The HDA process (excluding the use of the Software) is an improvement on the previous process to achieve an SSD declaration. The EOI process has increased the volume of applications substantially for SSDs across the State as originally intended.

It should be acknowledged that the use of authorised AI software for routine tasks, within many areas of government and business, is now common practice. However, it is not apparent that the Software used has been more effective than other authorised software available for use within the Department or available elsewhere in the NSW Government. In fact, external Cyber Security specialist advisors reviewed and identified that the software was used as an administrative assistance tool.

It is the view of this investigation that the likelihood of risk or integrity errors from the use of the Software is low. This view is reinforced by the observation of the governance (excluding the isolated use of the Software) around the EOI process established within the Department and the HDA.

The impact of errors, if they were to occur (which does not seem to be the case from the reviewed sample of EOI Reports), could be considered low to medium. This is because any EOIs declared as SSD through the HDA process must complete a detailed merit assessment process prior to final determination. There is a very high possibility that any error made in the initial HDA evaluation stage would be detected in the follow-on merit assessment.

The SSD merit assessment process does not use the Software. The EOIs that have already been declared as SSD through the HDA process are still in this merit assessment process.

However, notwithstanding the above and noting the actions already undertaken by the Department, the risk of an unauthorised software of any kind to any system or process within public administration needs to be recognised.

Recommendations have been made regarding reinforcing NSW Government and Departmental policy regarding the use of AI and implementing the NSW AI Assurance Framework. Recommendations are also made to review unsuccessful EOIs and post this Investigation undertake a continuous improvement review of the HDA. It is important for this to reaffirm the centrality of the process to Housing Supply in NSW.

In conclusion, the Review has not identified any issue with the integrity of the statutory decision-making process undertaken by the HDA in its recommendations to the Minister.

2. Scope, aim and methodology of the review

Scope

The scope of this review (**the Review**) is to consider the processes of the Department of Planning, Housing and Infrastructure (**the Department**) in providing advice to the Housing Delivery Authority (**the HDA**), with specific reference to the use of unauthorised software (**the Software**).

This includes considering and providing a view as to the integrity of that advice, and subsequent recommendations made by the HDA to the Minister of Planning and Public Spaces (**the Minister**).

The scope for the Review did not include considerations of potential misconduct or improper conduct of any individuals, and no findings or comments in that regard are made.

Aim

The aim of the Review is to:

- Assess the accuracy and completeness of the data and information input into the software against the applications submitted to the HDA.
- Assess whether the Software does anything other than summarise Departmental and publicly available information.
- Assess the accuracy and completeness of the data and information included in the reports produced by the Software.
- Assess whether the reports produced by the software system were reviewed by officers of the Department, consistent with the AI Ethics Policy for NSW Government, prior to being submitted for consideration by the HDA.
- Assess the stages at, and extent to, which the HDA's processes allow for and or require the input and advice of Departmental staff.
- Determine whether the integrity of the decision-making process is supported by:
  (a) the Department's briefings, including factual information and recommendations, to the HDA, and
  (b) the HDA's advice and recommendations to the Minister.
- With reference to best practice regarding the use of AI to support evaluation processes, make any recommendations for improvement regarding how the Department supports the operations of the HDA in relation to consideration of EOI proposals, having regard to the high volume of EOI proposals.

A summary of aims and findings is available at **Attachment A.**

Methodology

Documents reviewed

Documentation provided by the Department relevant to the operation of the HDA has been reviewed. Please see **Attachment B** for a list of these documents.

Interviews held

A list of interviews held is available at **Attachment C.**

The Executive Director, Panels and Housing Delivery was not interviewed as part of the Review due to the need for clear and consistent separation between concurrent processes relevant to the Software.

Relevant legislation and policies

Relevant legislation and policies can be seen at **Attachment D**.

Investigation timeline

- **27 November 2025:** Terms of Reference provided to Duncan Advisory
- **28 November – 10 December 2025:** Interviews conducted
- **2 December 2025:** Access to representative sample of EOI reports provided to Duncan Advisory for review
- **3 – 8 December 2025:** Material and EOI reports reviewed by Duncan Advisory
- **12 December 2025:** Update provided to Instructor
- **16 December 2025:** Report provided to Instructor.

3. Context

Establishment of the HDA

The HDA was established under the *Environmental Planning and Assessment Act (1979)* (EP&A Act) on 17 December 2024. The HDA is an independent body representing the Crown and is not subject to the direction of the Minister, except on matters relating to procedures or where the Minister issues a formal direction under the EP&A Act.

The HDA is a panel, with the panel Chair and members appointed by the Minister or the Planning Secretary, as the case requires. The HDA panel currently has three members:

- Simon Draper, Secretary of the Premier's Department (Chair)
- Kiersten Fishburn, Secretary of the Department of Planning, Housing and Infrastructure
- Tom Gellibrand, Chief Executive of Infrastructure NSW.

The Ministerial Order that created the HDA sets out its governance arrangements. How it conducts its business is clearly set out in the HDA Terms of Reference, Operating Procedures and Code of Conduct. These are available as follows:

- HDA Terms of Reference
- HDA Operating Procedures
- HDA Code of Conduct.

Role of the HDA

The purpose of the HDA is to implement the state-led determination pathway for major residential housing proposals and process rezonings to stimulate the timely delivery of new homes across Greater Sydney and NSW.

An expression of interest (**EOI)** process has been established that is used by the HDA. Developers can submit an EOI to the HDA for major housing developments above approximately $60 million in Greater Sydney and $30 million in regional NSW.

The HDA's role is to evaluate these proposals submitted through the EOI process and recommend to the Minister whether expressions of interest should be declared as State Significant Development (**SSD**). The HDA meets regularly to consider EOIs against the criteria.

The HDA's role in the SSD process ends once its recommendations are provided to the Minister. The HDA's functions do not include determination of SSD applications or further merit assessment of proposals.

The HDA's role in the SSD process is outlined in **Figure 1** overleaf**.**

What is State Significant Development?

Under Division 4.7 of the EP&A Act, any development that is important to the State for economic, environmental or social reasons can be classified as SSD.

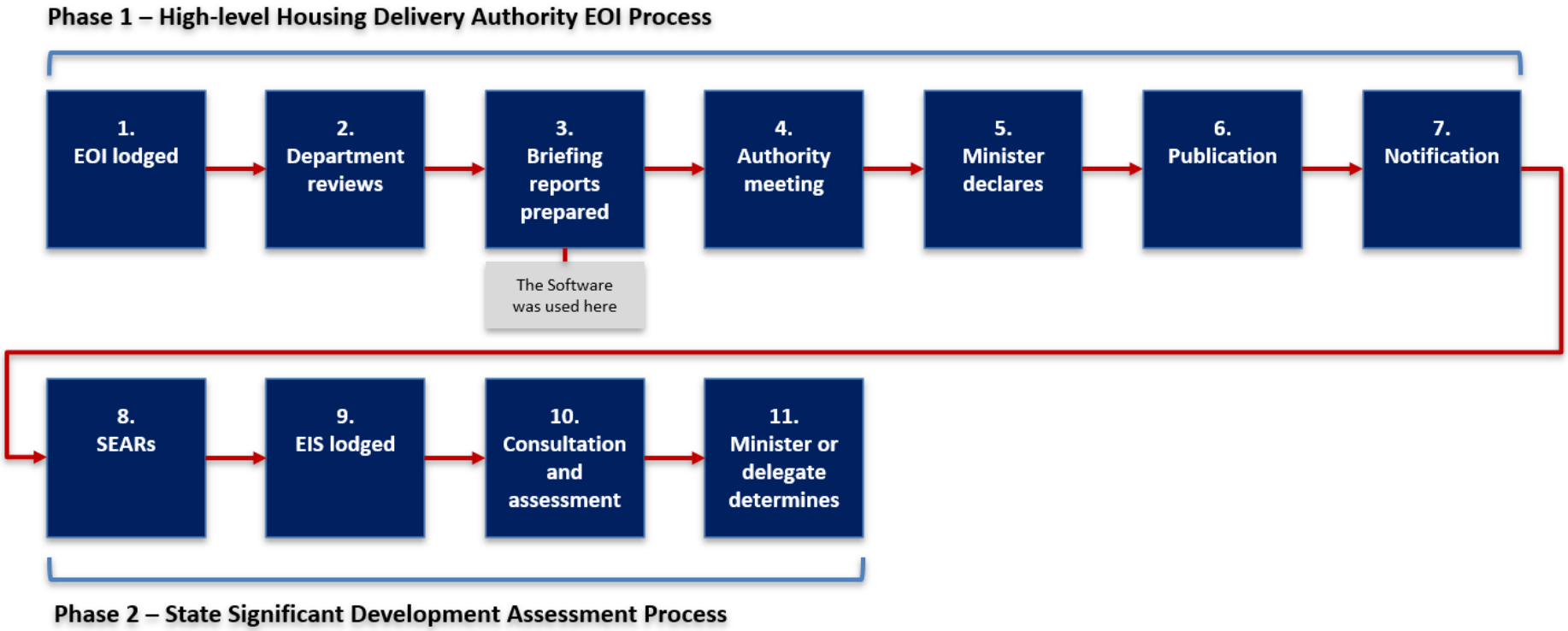
Following the Ministerial declaration as SSD, all proposals undergo a rigorous merit assessment prior to determination. The Department undertakes the merit assessment, and the Minister or delegate determines declared applications.

Departmental support

Administration and support for the HDA is provided by the Department's Panels and Housing Delivery team. Support includes:

- Scheduling of briefings and meetings
- Preparing and issuing agendas
- Preparing briefing reports for the HDA
- Preparing briefing notes for the Minister
- Preparing records of decision
- Record keeping for the HDA.

Figure 1 – The HDA's role in the SSD process



Decision making process and focus of the Review

The scope of the Review is to consider the processes of the Department in providing advice to the HDA. This process is outlined in **Figure 1** and in further detail in **steps 1-7 below.**

Focus of the Review

1. EOI lodged

- Applicants submit an EOI using the webform to outline the proposal and address the HDA's criteria.
- Council is advised.

2. Department reviews

- The Department reviews the EOI.

3. Briefing reports prepared

- Department prepares briefing reports and provides them to the HDA prior to the meeting.

4. HDA meeting (Panel meeting)

- The HDA evaluates EOI against relevant criteria.
- The HDA considers whether each EOI should be recommended to be declared, not recommended to be declared, deferred or should progress through an alternate pathway.
- The HDA provides advice and recommends proposals to the Minister that could be declared as SSD.

5. Minister declares

- The Minister reviews the HDA's advice and determines whether to declare proposals as SSD.
- The Minister can request additional information from the Department.

6. Publication

- Orders are made and published.
- Record of Briefing and proposal summary are published.

7. Notification

- Council and applicants are notified.

If the Minister declares an EOI as SSD, all proposals undergo a rigorous merit assessment prior to determination.

This is shown in **Figure 1** and in further detail in **steps 8-11 below.** This assessment process is out of scope for the Review as it does not involve the HDA or the use of the Software.

Out of scope for the Review

8. Applicant lodges request for Secretary's Environmental Assessment Requirements (SEARs)

- Proposals that are eligible to receive Industry Specific SEARs will be issued SEARs within 7 days of submitting a SEARs request.
- Proposals that require Project Specific SEARs will be issued SEARs within 28 days of submitting a SEARs request.
- For proposals that include complex rezonings the Department will hold a Planning Focus Meeting which includes the applicant and council.

9. Environmental Impact Statement (EIS) (development application) lodged

- Applicant lodges application with the Department (within 9 months of SEARs being issued).

10. Community consultation and assessment

- The Department undertakes a merit assessment of the SSD. This includes each of the legislated SSD steps including public exhibition of SSD, and where applicable, concurrent rezoning detail.

11. Minister or delegate determines

- SSD and concurrent rezoning will be determined within an average of 275 days of the EIS being lodged.

Since 17 December 2024 and as of 24 November 2025:

- EOIs received: 943
- EOIs assessed by the HDA: 584
- HDA meetings held: 16
- SSD declared by the Minister: 289
- EOIs with SEARS issued (through the HDA SSD pathway): 122
- EOIs with lodged EIS (development application): 13.

4. Summary of evidence

Timeline of key events

On 31 October 2025, the Department received a report that unauthorised software was being used to support the preparation of reports to the HDA.

The matter was initially investigated by the Human Resources and Professional Standards teams in the Department, prior to being escalated to the relevant Deputy Secretaries.

The Secretary was briefed on the matter on 18 November 2025. On 19 November 2025, the Minister's Office was advised. On 20 November 2025, the Minister was briefed and requested an independent review be undertaken.

Use of the Software

After an EOI is submitted to the Department via webform, the information is sent to the Panels and Housing Delivery team for initial quantitative collation of information. The Software was used at this stage of the process.

External Cyber Security specialist advisors have reviewed the Software and its use and identified that it was used as an administrative assistance tool to conduct the following tasks:

- Extract and summarise the content from public council web pages
- Answer questions from the user (limited to staff in the Department's Panels and Housing Delivery team with access to the Software) relating to development applications
- Complete formatting of address values
- Summarise the decisions made in meeting minutes
- Summarise the sentiments expressed in submissions made against development applications, and rate them on a scale of 0-5 in positivity.

The above tasks were used to collate information into a report template.

Following collation of the report template, the report template was then sent to multiple teams within the Development Assessment and Sustainability (DAS) and Planning, Land Use Strategy, Housing and Infrastructure (PLUSHI) groups in the Department to prepare qualitative planning advice for the HDA. The Software was not used in this qualitative stage of the process.

Artificial intelligence

The Software used Artificial Intelligence (**AI**) to complete the tasks outlined above.

AI refers to the development of computer systems capable of performing tasks that typically require human intelligence. The term AI is used to cover a broad spectrum of activities. This includes anything from piloting fully autonomous vehicles or diagnosing diseases, to simple tasks such as automating repetitive tasks to provide workflow efficiencies.

The AI leveraged in the Software was at the simple end of the AI spectrum. It collated publicly available information from the internet. It was not making any decisions or recommendations, nor undertaking assessments or authoring content.

The HDA's decision-making process

As outlined above, the HDA is a panel made up of three of the most senior public servants in the State. The panel members also have alternate members should they be required during leave or if conflicts of interest are identified.

Declaration of conflicts of interest

Prior to a HDA panel meeting, panel members are sent an initial list of EOIs, with information limited to address and applicant name. This is to determine whether HDA members have conflicts of interest (COI) with any of the EOIs scheduled for review at the upcoming meeting.

If a conflict is present, members defer to their alternate(s) to consider that EOI.

Review of reports

Prior to a HDA meeting, HDA panel members receive a meeting advice pack (**Reports**) from the Department. If COIs have been declared, the HDA member will not receive advice on that EOI.

As outlined above, the Software was used in the initial quantitative collation stage of the preparation of the Reports.

HDA meetings

Once the Reports are prepared, a HDA meeting then occurs. The meetings have the following format and structure:

- **Briefings -** in attendance for this section of the meeting are HDA panel members, relevant alternate(s), Deputy Secretary DAS, Deputy Secretary PLUSHI, Director Probity and members from the Panels and Housing Delivery team
    - Overview briefing
    - Strategic briefing, if applicable
- **Formal panel meeting** - in attendance for this section of the meeting are HDA panel members, relevant alternate(s), Deputy Secretary DAS, Director Probity and members from the Panels and Housing Delivery team (notetaking only)
    - The Chair runs through EOIs line-by-line for discussion

- Formal record of decision for each EOI.

All HDA members independently review the Reports prior to the meeting and consider whether they agree with the recommendations.

A record of meeting and a transcript of proceedings are completed for each HDA meeting. HDA panel members and any alternates in attendance endorse that these records are a true and accurate record of the briefing, prior to their publication. Records of HDA meetings are published on the Planning website.

Ministerial approval

Following the HDA meeting, the Department prepares a brief for the Minister outlining the HDA's recommendations.

The Minister considers each recommendation. The Minister does not have to accept the HDA's recommendations.

Changes to process after 18 November 2025

Once the Secretary of the Department became aware of the use of the Software, the HDA meeting scheduled for 20 November was postponed. 43 EOIs were scheduled to be reviewed at the meeting, and the Reports for the 43 EOIs had already been provided to the HDA's panel members. These Reports were prepared using the Software.

42 of the 43 EOIs scheduled to be considered at this meeting were rescheduled to be considered on 5 December 2025 and 9 December 2025. 1 EOI did not progress to the December HDA meetings to allow the Department to source additional information. This was not related to the use of the Software.

Prior to the meetings on 5 December 2025 and 9 December 2025, the Department completed a due diligence process for the 42 EOI Reports progressing to the meetings. The due diligence process entailed:

- Completing a manual transfer of any data that the Software would have inputted
- Checking whether the recommendation and position of the Department was correct once the data had been manually transferred.

Following this review, the Department did not identify any errors relating to the use of the Software. The 42 EOI Reports progressed to the December HDA meetings, with no changes to the previous recommendations.

Following the HDA meetings on 5 and 9 December 2025, it is understood that all future Reports will be prepared without the use of the Software.

5. Findings

The HDA had already identified a need to undertake a process review to inform process improvement and updates to its procedures, given it was established 12 months ago. More broadly than the use of AI tools, this review could include:

- Ensuring the process is scrupulously rigorous and has a “belts and braces” approach to avoid risk
- Requiring real time assurance, audit and progressive independent monitoring
- Considering the introduction of a Process Manager role to support the HDA
- Reinforcing clarity of the actual role and purpose of various players
- Adding penalty to the process for applicants who don’t comply, such as “return to go”
- Considering adding an independent Chair of substance and status (external of public sector) to the HDA panel
- Consideration of immediately post the Review, reaffirming centrality of process/mechanism/entity to housing supply.

The HDA process (excluding the use of the Software) is an improvement on the previous process to achieve a SSD declaration. The EOI process has increased the volume of applications substantially for SSDs across the State as originally intended.

Software of various forms is approved for use across government and for business within the Department. This includes enterprise software tools such as Microsoft CoPilot, Service Now, Google Vertex and Amazon WebService. AI embedded in these tools have been reviewed against the NSW Government AI Assurance Framework and approved.

The Software used in the collation of Reports for the HDA was not an authorised product and was located off the Department’s IT system. Therefore, an independent review was requested to assess risk to the integrity of the process.

It is not apparent that the Software used has been more effective than other authorised software available for use within the Department or available elsewhere in the NSW Government. In fact, external Cyber Security specialist advisors reviewed and identified that the software was used as an administrative assistance tool. It appears to have been used to input information from the EOI application and various other inputs from Departmental or public database(s) into a template. This template was included in the Reports provided to HDA members prior to a HDA meeting. The Reports also included a range of other information drafted by planning professionals in the Department.

It is understood that no external parties were able to access the EOI data inputted into the Software.

30 EOI Reports were reviewed as a part of the Review, in addition to HDA minutes and all related Briefing Notes to the Minister. No issues have been identified from a risk or integrity perspective.

42 EOI Reports were reviewed by the Department prior to the December HDA meetings. The Department also reviewed the same 30 EOI Reports provided to this investigation and discovered no errors. This brings the total number of EOI Reports reviewed by the Department to 72. No issues have been identified from a risk or integrity perspective.

This investigation has been made aware of a previous external probity review of the Billbergia Rhodes East application which is not related to the use of the Software and has been covered sufficiently in the probity review.

6. Recommendations

It is the view of this investigation that the likelihood of risk or integrity errors from the use of the Software is low. This view is reinforced by the observation of the governance (excluding the isolated use of the Software) around the EOI process established within the Department and the HDA. The information drawn by the Software was from reliable sources such as state or local government websites. In addition, there are many eyes on the Reports being prepared for the HDA. The HDA itself, which makes the recommendations to the Minister, consists of three very senior Public Servants.

The impact of errors, if they were to occur (which does not seem to be the case from the reviewed sample of EOI Reports), could be considered low to medium. This is because any EOIs declared as SSD through the HDA process must complete a detailed merit assessment process prior to determination. This detailed merit process includes the issuing of Secretary's Environmental Assessment Requirements (SEARS), Environmental Impact Statement, public consultation and Ministerial or delegate approval. There is a very high possibility that any error made in the initial HDA evaluation stage would be detected in the follow-on merit assessment.

The SSD merit assessment process has not and does not use the Software. The EOIs that have already been declared as SSD through the HDA process are still in this merit assessment process.

It is considered that despite the Software usage to prepare reports for the HDA, it appears to be isolated to administrative work. Any administrative error, if it were to have occurred, could have been detected and corrected in review by the Department's planning professionals and the HDA itself during the EOI assessment phase.

It should be acknowledged that the use of authorised AI software for routine tasks, within many areas of government and business, is common practice. Contemporary and sophisticated decision-making processes have the need to interface with various data sets, rules and regulations. The use of machines or computers to replicate human behaviour is required in these circumstances to undertake tasks accurately and efficiently, particularly when accessing large data sets and compiling or collating summary reports.

However, notwithstanding the above and noting the actions already undertaken by the Department, the risk of unauthorised software of any kind to any system or process within public administration needs to be recognised. The following recommendations are made:

1. Reinforce the NSW Government and Department's policies on the use of Artificial Intelligence within the HDA and the Department, including implementing the NSW AI Assessment Framework in line with the NSW mandate under Circular DCS-2024-04.

2. Consider using an authorised software alternative to achieve the outcomes required by the HDA in evaluation of EOIs and preparation of reports, noting the high volume of information needing to be considered in the required timeframe.

3. Note the successful outcome of the initial review of 72 of the EOI Reports prepared with support from the Software, however, review all unsuccessful EOI Reports prepared with support from the Software to check for any errors. Should material errors be found, consider a way that any such EOI can be reevaluated.

4. Post this review undertake the intended HDA review as a continuous improvement exercise given that the HDA has now been operating for 12 months.

7. Supporting attachments

- **Attachment A:** Summary of aims and findings
- **Attachment B:** Documents reviewed
- **Attachment C:** Relevant legislation and policies
- **Attachment D**: List of interviews held
- **Attachment E:** Reviewer background and acknowledgement
- **Attachment F:** Abbreviations and acronyms

Attachment A - Summary of aims and findings

SUMMARY OF INVESTIGATION AIMS	INVESTIGATION RESPONSE
A: Assess the accuracy and completeness of the data and information input into the software against the applications submitted to the HDA.	The Department has reviewed 72 EOI Reports for accuracy and completeness and no inaccuracies or deficiencies have been found. 30 EOI Reports were reviewed as a part of the Review, in addition to HDA minutes and all Briefing Notes to the Minister, with no obvious errors or inaccuracies discovered. For completeness, recommendation 3 should be implemented.
B: Assess whether the Software does anything other than summarise Departmental and publicly available information.	The investigation has seen and concurs with an independent specialist cyber security assessment of the Software. The assessment confirmed with medium confidence that the Software was used as an administrative assistance tool to conduct the following tasks: • Extract and summarise the content from public council web pages • Answer questions from the user (limited staff in the Department's Panels and Housing Delivery team with access to the Software) relating to development applications • Complete formatting of address values • Summarise the decisions made in meeting minutes • Summarise the sentiments expressed in submissions made against development applications, and rate them on a scale of 0-5 in positivity. Recommendation 1 should be implemented.
C: Assess the accuracy and completeness of the data and information included in the reports produced by the Software.	See response for point A above.
D: Assess whether the reports produced by the software system were reviewed by officers of the Department, consistent with the AI Ethics Policy for NSW Government, prior to being submitted for consideration by the HDA.	The Reports were reviewed by senior Departmental officers. All those interviewed for the Review indicated awareness of the NSW Government's AI Policy, however, it is apparent they were unaware that the Software was being utilised.

	Further, the investigation has noted that the Department is currently working with the NSW Department of Customer Service to implement the NSW Artificial Intelligence Assessment Framework. The investigation acknowledges this work was already underway and should be completed as soon as possible.
E: Assess the stages at, and extent to, which the HDA's processes allow for and or require the input and advice of Departmental staff.	The HDA's role in the SSD decision process is indicated above in figure 1 and subsequent narrative outlines the processes. The input and advice provided by the DAS and PLUSHI groups in the Department is substantial. In addition, support provided by the Panels and Housing Delivery team includes: • Scheduling of briefings and meetings • Preparing and issuing agendas • Preparing briefing input reports for the HDA • Preparing briefing notes for the Minister • Preparing records of decision and record keeping for the HDA.
F: Determine whether the integrity of the statutory decision-making process is supported by: (a) the Department's briefings, including factual information and recommendations, to the HDA, and (b) the Authority's advice and recommendations to the Minister.	Based on the information and evidence available to this Investigation, it is considered that the statutory decision-making process can be relied on. There appears to be no missing facts, issues with analysis, bias or influence. The HDA panel includes senior public servants, and a majority of members are independent of the Department. The HDA's work appears transparent and evidence based.
G: With reference to best practice regarding the use of AI to support assessment processes, make any recommendations for improvement regarding how the Department supports the operations of the Authority in relation to consideration of EOI proposals, having regard to the high volume of EOI proposals.	The HDA had already identified a need to undertake a process review to inform improvement and updates to its procedures, given it was established 12 months ago. Suggestions regarding improvements that could be considered more broadly than the use of AI tools are also included in the findings of this investigation. The HDA 12 month in process review should be undertaken post this Review. The implementation of recommendations 1 and 4 are essential.

Attachment B – Documents reviewed

- Background and context related to the process and statutory framework of the Authority
- Summary from the Department's Corporate Services Group regarding the use of the software
- Sample of EOI proposals submitted to the Authority representing c. 5% of the number of EOI's received since December 2024, including proposals that:
    - were both recommended and not recommended for a State significant development declaration by the Authority
    - are geographically dispersed, across different Local Government areas, including both regional and metropolitan based proposals
    - require a rezoning
    - did not comply with all of the published EOI criteria
    - were submitted by developers who submitted both single and multiple proposals
    - the Minister made a decision which was not in line with the recommendation of the Authority
- NSW AI Ethical Policy Statement
- Departmental policies regarding the use of AI
- Probity Reports.

Attachment C – Relevant legislation and policies

- *Environmental Planning & Assessment Act 1979 (s2.3)*
- Department of Planning, Housing and Infrastructure Information Governance Framework
- Department of Planning, Housing and Infrastructure Cyber Security Policy
- Department of Planning, Housing and Infrastructure Records and Information Management Policy
- Department of Planning, Housing and Infrastructure Procurement Policy

Attachment D - List of interviews held

- **Brett Whitworth,** Deputy Secretary, Office of Local Government
- **David Gainsford,** Deputy Secretary, Development Assessment and Sustainability
- **Kiersten Fishburn**, Secretary, Department of Planning Housing and Infrastructure and Member of the Authority
- **Leah Schramm,** Executive Director, Planning Delivery and Integration
- **Monica Gibson,** Deputy Secretary, Planning, Land Use Strategy, Housing and Infrastructure
- **Natasha Scott,** Chief Information Security Officer
- **Simon Draper,** Secretary, Premier's Department and Chair of the Authority
- **Tom Gellibrand,** CEO, Infrastructure NSW and Member of the Authority.

Attachment E - Reviewer background & acknowledgement

Peter Duncan has over 40 years' experience in government and infrastructure, working at local, state and national levels.

He is the principal of an advisory business and holds non-executive director and board chair roles. His current appointments include Chair of Australian Rail Track Corporation (ARTC), Chair of WaterNSW, and Chair of the NSW Local Government Boundaries Commission. He is also a board member of Infrastructure NSW and of the Australian Public Policy Institute.

Peter was previously a Commissioner of the Independent Planning Commission and has worked as Chief Executive in areas such as transport, infrastructure, forestry, parks, maritime, technology and services. He has held various senior public sector leadership roles including in local government, Premier and Cabinet, Transport for NSW, Primary Industries and for the Olympic Coordination Authority.

Peter is a Member of the Order of Australia, Institute of Company Directors, a National Fellow of the Institute of Public Administration Australia, and a Companion of the Institute of Engineers Australia.

Acknowledgement: This investigation was undertaken with the input and open participation of Housing Delivery Authority panel members and Department of Planning, Housing and Infrastructure staff. I would like to thank all for their frank and constructive input to the process.

Peter Duncan AM
Duncan Advisory

15 December 2025

Attachment F – Abbreviations and acronyms

- **Department** means the Department of Planning, Housing and Infrastructure which provides technical and administrative support to Housing Delivery Authority.
- **EP&A Act** means the *Environmental Planning and Assessment Act (1979)*.
- **HDA** means the Housing Delivery Authority, as established under the EP&A Act and outlined in the Ministerial Order.
- **Minister** means the Minister for Planning and Public Spaces.
- **SSD** means State Significant Development. Under Division 4.7 of the EP&A Act, any development that is important to the State for economic, environmental or social reasons can be classified as SSD.
- **SSD declaration** means an EOI proposal has been declared by the Minister as State Significant Development. The proposal must still undergo the SSD merit assessment process and be determined by the Minister or delegate before it is approved to commence.
- **SSD determination** means a proposal has gone through the SSD merit assessment process, and has been approved or refused by the Minister or delegate. If approved, the applicant is required to comply with the conditions of the development consent for the project.