

16 December 2020

Department of Planning Industry and Environment
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Attention: Jim Betts

Dear Jim,

Draft Illawarra Shoalhaven Regional Plan 2041 Planning Institute of Australia Submission

The Planning Institute of Australia (PIA) appreciates the willingness of the Department and the Department's Southern Region to actively engage with PIA during the drafting of the *Illawarra Shoalhaven Regional Plan 2041* (draft Plan). The active engagement has allowed PIA to understand the draft Plan's progression from a series of ideas to a consolidated document that has considered the evolving land use planning requirements generated by the events of late 2019 and 2020.

We appreciate the Illawarra Shoalhaven Regional Plan 2015 is the first of NSW's regional plans to be updated, with the approach taken for the draft Plan setting a precedent for the upcoming reviews of the suite of NSW regional plans. Consequently, PIA considers it absolutely critical that the draft Plan is a thorough document that meets the evolving needs of the Illawarra Shoalhaven Region.

PIA has prepared a separate submission summarised in **Attachment A** addressing the upcoming tranche of NSW Regional Plans, with this submission focusing solely on the detail within the draft Plan.

We commend the Department for the work undertaken on the draft Plan, with a series of comments provided below for consideration. PIA would welcome the opportunity to discuss these points with the Department in greater detail.

Framework

The draft Plan provides an updated layout that helps to create a clear framework to connect the key themes through the draft Plan. While there are an overly large number of objectives and strategies, which is likely to dilute their chance of success PIA supports the limited number of Actions, which are specific and clearly identified as being undertaken by the Department. The level of accountability associated with the Actions is positive.

A key success factor will be the strength and cohesiveness of the Coordinating and Monitoring Committee. If the Committee is split by self-interest associated with each of the stakeholders, then it is unlikely to be successful. PIA considers it critical the Committee is led by a planner with a mandate for implementation and the ability to deliver decisions.

Resilience and Sustainability

PIA was encouraged that our input was heard on the importance of planning for resilience (especially given the bushfires of 2019-20) - and the inclusion of a dedicated theme: **'sustainability and resilience'** in the draft on exhibition. This is a critical component of future Regional Plans which should work to build in the characteristics of resilient systems (see adaptability / diversity / redundancy / modularity / subsidiarity).

Cultural Heritage

The draft Plan makes a consolidated effort to integrate cultural awareness as a key thread to guide land use planning. While only one of the Objectives specifically references the Aboriginal community, the majority of the nine Actions all focus on providing a more inclusive and sustainable Region that aligns with many of the principles articulated by Australia's First Peoples.

Integration with Local Strategic Planning Statements

A large body of work has gone into producing the Council's Local Strategic Planning Statements (LSPS), with these documents driven by the community's vision for their local areas. PIA supports the intent to link the draft Plan with the LSPS and in doing so connects with the implementation documents in the form of the local environmental plans and development control plans. This connectivity ensures a hierarchy of control and strategic direction, while also helping the draft Plan to remain relevant in planning decisions.

Employment and Industry

The draft Plan identifies the:

"Illawarra Shoalhaven is transitioning to a low-carbon economy. It is a global hub for clean energy, with green hydrogen production at the Port of Port Kembla, biogenic gas and pumped hydro in the Shoalhaven, and employment precincts that capture solar power and convert waste to energy."

PIA supports this statement and the promotion of *"opportunities for clean energy in the region including pumped hydro, hydrogen and biogenic gas"*, as articulated by Strategy 15.3, assuming these low carbon industries undergo a rigorous environmental assessment to ensure the proposed locations and associated controls are appropriate. However, the draft Plan also includes Strategy 10.1, which identifies consideration of *"the ongoing operation of existing mining and resource extraction and future development of known resources"*.

PIA seeks confirmation from the Department on the proposed direction for energy generation in the Illawarra Shoalhaven. Furthermore, we consider it essential that a clear planning framework is put in place to incentivise development, including zoning, along with consideration of upfront infrastructure planning and contributions benefits, with Western Australia's Oakajee Strategic Industrial Area illustrating how this could be achieved.

The draft Plan identifies numerous initiatives to encourage advanced manufacturing, which are supported. However, the Illawarra Shoalhaven remains well positioned to support large scale manufacturing and heavy industry with its connections to freight and logistics infrastructure in the form of Port Kembla, as well as regional road and rail networks. In addition to existing and potential readily available energy sources and well positioned land.

It is essential that the Region's industrial potential is realised, with appropriately located and zoned land released for development and strategies put in place to maintain and enhance logistics chains. To achieve this PIA supports the establishment of a Development Corporation to coordinate and drive industrial development, as has been achieved in Western Sydney and the Hunter through a coordinated whole of government approach.

Integrate Commercial and Education Precincts

Objective 1 states:

"Strengthen Metro Wollongong as a connected, innovative and progressive City"

Objective 2 states:

"Grow the region's Regional Cities"

Regional cities within the Illawarra Shoalhaven have experienced a decline in retail and commercial activity, both during 2020 and prior due to a combination of increased online spending and out of town shopping centres. As a result, the regional cities, specifically Wollongong and Nowra have an excess of unused or underused commercial and retail space. These commercial centres could be reactivated, while improving the knowledge economy through incentivising university and TAFE teaching to relocate from solely campus style facilities to a mix of campus and city-based learning.

The use of underutilised space in the city centres for lecture or research space, with associated incentives including floor space ratio benefits or reduced contributions, while disincentivising campus growth would help to add vibrancy and innovation to the city centre. There would be an increased demand created for existing services and commercial premises. City centre-based learning would also help to reduce single use communities, increasing social diversity, while limiting the need for replicating services and facilities.

Affordable Housing

The draft Plan Action 8 identifies the establishment of an *"Illawarra Shoalhaven Affordable Housing Roundtable with councils, community housing providers and the NSW Government to collaborate, build knowledge and identify barriers to increase the supply of affordable housing"*. PIA is fully supportive of this initiative, with the draft Plan providing additional direction within Strategy 19.2. However, a key aspect of affordability is housing supply.

While development applications are caught up in red tape, with timeframes of several years common for more complex development applications and an increase in the number of applications going before the Court, affordability is likely to remain a critical issue. Supply must be addressed through the cleaning up of the development application process to allow affordability to become a more realistic goal.

State Led Development Planning

PIA is supportive of the nine Actions committed to by the Department. However, we would like to see the Department take on the role of champion for those challenges faced by Council that are potentially beyond their remit to fully address. Examples include the release of land for development around Port Kembla and the integration of education institutions into regional centres.

Action 3 takes a step towards this bolder role for the Department in the development of precinct profiles for employment lands. However, this needs to be supported by firm political will to deliver.

In summary PIA is supportive of the Department's approach to this first Plan in the tranche of NSW regional plans, along with the efforts made by the Department to engage with PIA. However, we have identified a number of items that we believe would strengthen the outcomes achieved by the draft Plan.

Thank you once again for the opportunity to engage with you. Should you wish to discuss further please contact the undersigned or [REDACTED]

Yours sincerely

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Attachment A – General Comments Regarding future regional plans across NSW

PIA believes the next tranche of NSW regional plans could be strengthened to:

- Adopt clearer place-based outcomes – which offer a spatial interpretation of their jurisdiction’s priorities
- Ensure that these outcomes respond to the tectonic economic, environmental and social shifts that have unfolded since 2015 - with a view to improving ‘resilience’ and acknowledging its implications for planning and adaptive management systems
- Consider the recommendations of NSW (rec 27) and National Bushfire Inquiries (rec 19.3) in relation to ‘building back more resilient’ and adopting landscape scale hazard management strategies for land use planning.
- Consider population, job and housing targets collectively across the state and appreciate their implications and interactions with state and national growth scenarios. (NB. scenario planning approaches such as that adopted in Western Sydney PIC and SE Sydney Transport Strategies)
- Respond to a community value shift in favour of local improvements in living conditions, connectivity, place and public spaces (acknowledging links between Local Strategic Planning Statements and the Regional Plans)
- Consider the role of Place-based Infrastructure Compacts (PICs) as a means of implementing integrated land use, infrastructure and funding initiatives – and consider program budgeting to agglomerate multiple small local projects under a single business case.
- Establish a basis for integrated statewide infrastructure planning including adopting common demand parameters for infrastructure planning – asking what is the per capita demand for water, power, data, energy in different regions - and how these relate to growth and change under different scenarios
- Consider how environmental parameters should drive planning strategy in relation to sea level rise, flood management planning, carbon emissions and biodiversity protection