

Draft Shoalhaven City Council Submission on the *Draft Illawarra Shoalhaven Regional Plan 2041*

Summary

Shoalhaven City Council supports the development and delivery of a new Regional Plan as it is an important element in strategic land use planning for the overall Illawarra-Shoalhaven Region. Council strongly supports the initiatives for encouraging economic growth, strengthening Shoalhaven's commercial centres and employment lands, and delivering essential infrastructure. These initiatives, along with the programs to manage the natural and built environment, generally align with those identified in Council's current Local Strategic Planning Statement - *Shoalhaven 2040*.

This submission:

- Notes the limitations of the engagement process for the draft Plan.
- Recommends improvements to the structure of the draft Plan, its sections, and maps.
- Supports the:
 - Identification of regionally significant precincts and planning processes.
 - Establishment of a proposed Coordinating & Monitoring Committee.
- Requests the NSW Government to confirm its commitment to advancing the Nowra-Bomaderry Bypass by identifying a strategic corridor for the bypass.
- Seeks the inclusion of Jervis Bay-St Georges Basin as a third strategic centre in Shoalhaven consistent with existing planning.
- Advocates for:
 - Balancing the planning and delivery commitments between the NSW Government, councils, and other delivery agencies.
 - NSW Government support for Councils to undertake and support community-led resilience planning.
 - Greater NSW Government commitment to the implementation of the plan.
- Requests clarification regarding:
 - Timeframes for the actions, strategies, and collaborative activities.
 - Indicators for monitoring the implementation of the plan.
- Addresses the plan's interaction with Council's Local Strategic Planning Statement.

Engagement Process

We acknowledge the efforts of the Working Party established to inform the development of the draft Plan to engage with Council staff throughout the preparation of the draft Plan. However, this engagement effort was minimal towards the publication of the draft Plan and did not provide early access to eventual draft content. This Working Party provided the ideal platform to understand, at an early stage, the level of resourcing required to implement the published Plan and the potential commitment from councils and other delivery agencies. This level of liaison may have helped better inform the scope and scale of achievable work.

The webinars on the draft Plan were welcomed but, being general in nature, did not provide Councillors or Council staff the opportunity to examine areas of interest in more detail.

Whilst the opportunity to provide an initial 'placeholder' submission was appreciated, the six-week exhibition period of the draft Plan (complex document with approximately 80 pages) was too short to allow Council staff to fully brief the elected Council. This was compounded

Draft Shoalhaven City Council Submission on the *Draft Illawarra Shoalhaven Regional Plan 2041*

by it closing just prior to Christmas, the limitations of the briefings offered by the Department and the misaligned exhibition periods of the various draft regional land use and transport planning documents making a coordinated review problematic.

Recommendations:

1. *Future regional planning documents should continue to be developed using a partnership approach to confirm the detail of agreed focus areas, anticipated resourcing requirements, and achievable commitments.*
2. *Draft regional planning documents of this nature should be exhibited for 12-weeks and supported with detailed workshops or presentations for Councillors to explain the background and intent or proposed programs and actions.*
3. *Wherever possible the exhibition of draft regional land use, infrastructure and transport planning documents should be aligned.*

Plan Structure

The draft Plan includes a large number and complex variety of interconnected parts, including:

- 4 Themes,
- 30 Objectives,
- 3 types of Regionally Significant Precincts (Employment Lands, Growth Areas, and Centres),
- 9 Actions
- 62 Strategies
- 5 Collaborative Activities

All these items also set implementation activities and as a result of the overall complexity, the structure reduces the legibility of the document reducing opportunities for communities and delivery agencies to understand proposed outcomes, work, and responsibilities.

The mapping should set the current context for the region as well as proposed growth and other opportunities over its 20-year timeframe, identifying matters such as key locations for providing new homes and employment opportunities and how the role of strategic centres will change. For example, confirming the future role of Nowra City Centre helps secure commitments and investment for the work Council and other delivery agencies will be required to make to manage change. However, this may be too much information to successfully present on a single map.

The current mapping also requires several amendments to improve its accuracy and identify significant areas or matters, including:

- refinement of the Blue Highway and existing ports, wharfs etc.
- improved road connectivity mapping given the release of various options reports related to the Princes Highway in late 2020.
- health and educational establishments in Milton and Ulladulla.
- the location of the Jervis Bay-St Georges Basin strategic centre.
- the broad sweeping nature of the 'biodiversity corridor' shown on the draft vision map.

Draft Shoalhaven City Council Submission on the Draft Illawarra Shoalhaven Regional Plan 2041

The inclusion of *Objective 8: Strengthen the economic self-determination of Aboriginal Communities* is strongly supported. However, it is currently included in the theme: *A productive and innovative region*. Given it addresses a broad range of issues and actions, the proposed work may be better located in the plan with commitments stated upfront or placed in the theme: *A region that values its people and places*.

Objective 16: Support the development of a circular economy is currently included in the theme: *A sustainable and resilient region*. However, it may also fit better in the theme: *A productive and innovative region* to help recognise the innovative and evolving nature of this industry and the potential contribution it will make to the region's economy.

Recommendations:

4. *Examine opportunities to simplify the structure and relationship between themes and objectives, the subsequent actions, strategies and collaborative activities, and the range of regionally significant precincts.*
5. *Provide a summary of all implementation activities as an appendix providing "at a glance" and possibly on one-page information about planned work, timeframes and responsibilities.*
6. *Update the mapping to provide a baseline map setting the current context for the region, a vision map setting out the likely/proposed growth and opportunities and consider the other matters identified.*
7. *Improve the accuracy of the mapping to identify the Blue Highway and associated infrastructure, existing establishments and services, and the location of strategic centres (the inclusion of Greenwell Point should also be considered).*
8. *Review the current arrangement, wording, and interaction between objectives to ensure relevant placement and prominence in the document and remove duplication.*

Implementation

The draft plan sets 9 Actions for delivery by the Department during the first five years of the plan. It is however silent on planned or possible work beyond year 5. This equates to less than two pieces of work per year. In contrast, the draft plan includes 62 strategies guiding the work of councils and other delivery agencies. No timeframes are provided for the strategies.

At present there is a concern that Council will carry much of the implementation burden and associated community expectation associated with the Plan. 7 of the 9 Actions apply to Shoalhaven and require Council's direct input, a contribution, or at the least collaboration activity. 34 of the 62 strategies nominate Council as the delivery lead. This is in addition to the 5 collaborative activities and the proposed formal and informal collaborative frameworks for the delivery of selected Objectives. This however potentially provides direction on Council's future work without consideration of other commitments, current resources or offers of implementation assistance. It requires significant resourcing and could prompt the reallocation of current and planned work, projects, and priorities, impacting on Council's existing strategic planning work program.

There is a clear need to improve the balance of future work between the Department, councils, and other agencies. This should align strategies and associated work, reducing them where needed to match council resources. Council requests the Department to continue to make a greater contribution towards strategic land-use planning in the region, including for the period after the initial five years. This requires greater commitment to implement the plan with a range of support such as direct funding, provision of resources,

Draft Shoalhaven City Council Submission on the Draft Illawarra Shoalhaven Regional Plan 2041

specialist training, and commissioning technical studies to inform the work required to implement Actions and Strategies.

No timeframes are identified for the Actions or Strategies, making it hard for councils and delivery agencies to plan to commit resources or deliver outcomes. This will also possibly set up unrealistic expectations in the community and other areas.

The draft Plan includes some baseline statistics for selected Objectives and Council supports the proposed online dashboard of indicators. To complete the monitoring exercise, the plan needs to confirm the indicators and reporting processes selected to help monitor its implementation. Ideally a single reporting tool or portal should be developed that integrates other state government reporting requirement for the region, for example arising from the draft Regional Transport Plan, and minimises requirements for Councils.

Council supports the establishment of the Coordinating & Monitoring Committee to assist with the implementation of the final plan and provision for Council representation on this committee. The Department however needs to clarify the role, delegations, and decision-making ability the proposed Committee will have, for example, the ability to change the priority of Actions, accelerate the review of the plan in response to emerging planning matters, direction of Council's work, etc. This committee also needs to focus on the implementation of the plan as a whole and ensuring the relevant outcomes across the four local government areas.

Recommendations:

9. *Identify likely land use planning issues and the Department's proposed strategic land use planning work for years 6-20.*
10. *Improve the balance of future work between the Department, councils, and other agencies or reduce the expectation on councils.*
11. *Increase and confirm commitment to help implement the plan including direct funding to increase council resources, and support measures such as training and specialist studies.*
12. *Indicate potential model(s) for proposed formal and informal collaborative frameworks to confirm resourcing requirements for councils and delivery agencies, e.g., number and frequency of meetings, expectation of funding for technical work etc.*
13. *Identify potential timeframes for the strategies to allow Councils and delivery agencies to prepare for and align land use, infrastructure, and transport planning activities.*
14. *Confirm appropriate and measurable indicators and reporting processes to monitor the success of implementing the plan and to inform future reviews of the plan.*
15. *Clarify the role, delegations, and decision-making abilities of the proposed Coordinating & Monitoring Committee.*

Regionally Significant Precincts and Urban Growth Boundaries

Regionally Significant Precincts

Council supports the identification of Regionally Significant Precincts and the development of a framework and coordinated approach to identify the future role of the land, future planning and infrastructure outcomes and simplified planning processes. This includes:

- Selecting *Albatross Aviation and Tech Park* and *South Nowra Employment Precinct* as regionally significant employment land.

Draft Shoalhaven City Council Submission on the Draft Illawarra Shoalhaven Regional Plan 2041

- Confirming Nowra-Bomaderry as a regionally significant growth area.
- Supporting Nowra City Centre and Milton-Ulladulla as regionally significant centres.

Council welcomes the focus on the Nowra Riverfront Precinct, including the recent establishment by the NSW Government of an Advisory Taskforce involving relevant Ministers, NSW Government Departments, Council, and others. This taskforce and its role need to be recognised in a recast Strategy 2.1. The identification of a clear and potentially streamlined planning/infrastructure/development assessment process will also be critical in encouraging critical private investment in this precinct and this should be highlighted in the Regional Plan as an urgent priority.

Council requests greater recognition of Jervis Bay-St Georges Basin area as the third regionally significant centre in Shoalhaven given its current and potential future role in providing homes and employment opportunities within its significant environmental values. The area is currently home to approximately 26,000 people – about a quarter of Shoalhaven's population – and requires some innovative planning to manage a level of continued growth, an ageing population, a significant visitor economy, and a service centre role for surrounding areas such as Falls Creek, Wandandian and Sussex Inlet.

The clear identification of this area as a strategic centre enables Council to consider and settle options to manage its growth and investigate any potential contribution it can make to manage growth more broadly within its recognised environmental values. The identification of this area also helps secure the land use, infrastructure, and transport planning and delivery work to support existing and potential future communities.

Recommendations:

- 16. Recognise the establishment of the Advisory Taskforce for the Nowra Riverfront Precinct and the need to establish a streamlined planning/infrastructure/development assessment process for this precinct.*
- 17. Clearly identify the Jervis Bay-St Georges Basin area as a regionally significant centre.*

Urban Growth Boundaries

Council generally supports the concept of Urban Growth Boundaries and the aim of concentrating planning for existing centres and urban areas to make efficient use of existing and planned infrastructure and services. Council also acknowledges the opportunities this approach provides for managing non-urban land and its range of scenic, rural, environmental, and coastal values.

Council welcomes the opportunity to identify and set urban growth boundaries through its strategic land use planning work based on technical analyses and tested with community consultation. The flexibility that this provides, subject to appropriate work, is appreciated.

Improving Major Road Connections

Council supports the objectives aiming to create a connected and accessible region. It has identified a clear need for progressive planning and implementation of upgrades to the Princes Highway and associated road network, including bypass options, to address observed and forecast congestion through Bomaderry and Nowra. Such work is essential to promote investment and development in the City Centre, improve its connections with other centres and manage the seasonal load generated by the visitor economy.

Draft Shoalhaven City Council Submission on the Draft Illawarra Shoalhaven Regional Plan 2041

Council is actively planning and advocating for a range of solutions, including additional lanes through Nowra-Bomaderry, a Nowra-Bomaderry Bypass, and other local road projects to spread the load and facilitate more efficient travel along the Highway. This includes reserving the land required for the planned Nowra-Bomaderry Bypass in its local planning documents. Council requests this commitment is matched in the Regional Plan.

Council supports the suite of improvements Transport for NSW is planning and delivering south of Nowra and the Nowra Bridge Project, but requests these to be expanded to include the urgent planning and delivery of the Nowra-Bomaderry Bypass and other potential solutions to improve the capacity and performance of the existing Princes Highway.

Recommendations:

- 18. Recognise the need to address congestion through Nowra-Bomaderry as a priority to improve connections to and promote investment and development in Nowra City Centre.*
- 19. Identify a strategic corridor(s) for potential solutions, including a Nowra-Bomaderry Bypass, in the final Regional Plan.*

Proposed Objectives, Actions, Strategies and Collaborative Activities

Objective 1 – Strengthen Metro Wollongong as a connected, innovative, and progressive city

Wollongong's continued role as the primary centre within the region is acknowledged.

Objective 2 – Grow the region's regional cities

The proposed Department-led Action to develop a Strategic Roadmap for the Nowra City Centre is supported. Council welcomes this work as a strong start to the significant planning task(s) required to support the continued development of Nowra into a Regional City. However, the draft plan does not provide any detail on what the work might look like, timeframes, or the resources Council will need to commit. This makes it hard to determine how the Action aligns with Council's current and planned work for the Centre identified in its current Local Strategic Planning Statement.

One planning initiative proven to assist in the accelerated delivery of projects and development is a streamlined planning and approval framework that also considers and facilitates supporting infrastructure, land acquisition etc. It is critical that this is considered as part of this action and the State Government needs to clarify how it will support this work or its implementation with funding or other assistance.

Recommendations:

- 20. The development of the proposed Strategic Roadmap for Nowra City Centre must be prepared in collaboration with Council and include Council's existing and planned work for the centre. The Roadmap must also include innovative initiatives such as, but not limited to, streamlined approval and development processes to help facilitate and encourage the actual delivery of projects in this key precinct.*

Objective 3 – Grow the Port of Port Kembla as an international trade hub

Port Kembla's existing and future role in this regard is acknowledged.

Objective 4 – Activate regionally significant employment precincts to support new and innovative economic enterprises

Draft Shoalhaven City Council Submission on the Draft Illawarra Shoalhaven Regional Plan 2041

The Department-led Action for employment precincts is strongly supported and the collaborative approach to develop employment lands and get them to market is welcomed. The Action should include the development of a simplified planning and approval framework building on the mechanism(s) adopted elsewhere in NSW for defined Special Activation Precincts.

Council supports the strategy to retain and manage regionally significant employment lands for the future, safeguarding them from competing pressures, and provide flexible planning controls. However, the identification of the infrastructure delivery and coordination task for Councils ignores the range of delivery agencies with infrastructure delivery responsibilities. Infrastructure planning for existing key employment lands is an area requiring a focussed approach involving Council, the NSW Government, and others.

Recommendations:

- 21. The proposed precinct profiles and precinct collaboration teams should be supplemented with simplified planning, approval, and infrastructure delivery frameworks where relevant and critical to the future delivery of areas.*
- 22. The collaboration teams should include infrastructure delivery agencies to align infrastructure delivery to support the cost-effective realisation or rollout of employment land (removing this task from/supplementing Strategy 4.1).*

Objective 5 – Create a diverse visitor economy

This objective needs to acknowledge the forecast increase in visitor numbers to the region, including the increase associated with greater levels of domestic tourism due to the continuing COVID-19 pandemic. This increase brings the challenge of providing a sufficient amount and type of tourist and visitor accommodation throughout the region. The plan should acknowledge the rising popularity of holiday accommodation through online accommodation networks and the associated increase in visitor numbers in beachside suburbs, impacting on the amenity of these suburbs and the availability and affordability of long-term accommodation.

The longer-term aim of creating a diverse visitor economy requires work to respond to the seasonal nature of tourism and deliver a year-round visitor economy. The plan should action work to identify regional strengths and opportunities – both area and industry based - and the infrastructure and assets required to attract events and more business to the region.

Recommendations:

- 23. The final plan needs to recognise the impacts of the continuing COVID-19 pandemic on the visitor economy and identify shorter term considerations or actions that can assist in this regard.*
- 24. This objective should record current and planned work between the NSW Government, councils, tourism operators, and the holiday rental industry on the review of planning controls and other measures to manage short-term holiday accommodation.*
- 25. This objective should action work to research opportunities to create a year-round, diverse visitor economy across the region.*

Objective 6 – Activate the region's harbours to promote a blue highway

This objective and the associated strategies are supported. However, the commentary under this objective needs to recognise the role that the Shoalhaven River and Jervis Bay can play in this regard.

Draft Shoalhaven City Council Submission on the Draft Illawarra Shoalhaven Regional Plan 2041

26. *That the commentary in the plan recognises the role that the Shoalhaven River and Jervis Bay can play in the 'blue highway'.*

Objective 7 – Respond to the changing nature of retail

This objective is supported, especially the strategies to:

- provide flexible planning controls to facilitate a broad range of uses within centres, and
- focus future commercial and retail activity in existing commercial centres before selecting alternative, out-of-centre sites.

Both measures are considered necessary to support and strengthen existing centres and the range of shops, services and employment opportunities provided for surrounding communities. However, the actions under this objective must include work to better understand the changing nature of retail across the region noting the many matters currently affecting this industry. These include, but are not limited to, the impacts from online retailing, customer's desire for experiences over straight retail, and the impacts from the restrictions required to manage the ongoing COVID-19 pandemic.

Recommendations:

27. *The work under this objective must include actions to understand the changing nature of retail and associated challenges and opportunities across the region and identify potential planning options to assist.*

Objective 8 – Strengthen the economic self-determination of Aboriginal communities

This objective and the associated strategies are supported. Council is keen to continue to proactively work with the Land Councils in Shoalhaven about their landholdings. It is critical, given existing relationships, that Council is actively involved in the proposed work on Strategies 8.1 to 8.4.

Recommendations:

28. *Ensure that Councils are actively involved in the proposed work with Local Aboriginal Land Councils and others on Strategies 8.1 to 8.4.*

Objective 9 – Promote agriculture innovation, sustainability, and value-add opportunities

This objective is supported, especially the strategies to:

- protect identified important agricultural land and industries from other land uses, land-use conflict, and fragmentation, and
- manage rural-residential development through well-researched and community tested local strategic planning work and documents.

Both measures are considered necessary to support and where appropriate grow this industry. However, this objective should also:

- confirm the timing and likely outputs of the NSW Government's *Important Agricultural Land Mapping Project*, and
- acknowledge the significant amount of work underway to implement the *Right to Farm Policy* and develop an *Agricultural Land Use Planning Strategy*.

Draft Shoalhaven City Council Submission on the Draft Illawarra Shoalhaven Regional Plan 2041

The preparation of a body of work is needed for the region to understand agricultural opportunities, including those provided by the need to increase food security both locally and more broadly, noting significant demand/opportunity from Greater Sydney due to its diminishing stock of rural land.

Recommendations:

- 29. This objective should confirm the timing and likely outputs of the NSW Government's Important Agricultural Land Mapping Project.*
- 30. This objective should acknowledge and if needed reflect the work underway to implement the Right to Farm Policy and develop an Agricultural Land Use Planning Strategy.*
- 31. This objective should action work to understand the region's agricultural opportunities.*

Objective 10 – Sustainably maximise the productivity of resource lands

This objective and its associated strategies are generally supported. It is critical the NSW Government Department responsible for mineral resources plays a lead or key role in Strategy 10.1 given its nature.

Recommendations:

- 32. That the NSW Government Department responsible for the mineral resources take a lead role on Strategy 10.1 consistent with the NSW Minerals Strategy 2019.*

Objective 11 – Protect important environmental assets

This objective and its associated strategies are generally supported, but require further detailed dialogue with Councils, noting the responsibility for implementing the six (6) strategies that sit under it all rest with Councils. In this regard, more detail (mapping) is needed for 'high environmental value lands' that appear on the Environmental Values Map so that potential implications can be identified and discussed. The intent and potential scope of Strategy 11.3 (climate refugia) also requires further discussion.

Recommendations:

- 33. That further detailed discussions take place with the Councils regarding the final detail of the six strategies that sit under Objective 11.*

Objective 12 – Build resilient places and communities

This objective and its associated strategies are generally supported and are relevant given recent experiences (bushfire, flood, COVID-19). The proposed action to develop a resilience maturity matrix to identify where further land use planning work is required can be significantly strengthened by moving beyond just land use planning and considering related matters. In this regard, infrastructure delivery and management (electricity, communication, and transport) are also critical to increasing resilience and managing the effects of natural hazards and other events. The proposed matrix should be broadened to include all aspects of resilience planning to facilitate a comprehensive and coordinated response, otherwise its risks being relatively ineffective if it solely focusses on land use.

Council acknowledges resilience planning is extremely important work required to reduce the impacts from natural hazards and other events on the region's communities. The many experiences throughout the 2019-2020 period associated with bushfires, floods and a global pandemic has accelerated the need for and focus on such work. Resilience planning is still an emerging concept and an understanding of overall impacts and responses and the resources allocated towards it are in their infancy, noting Resilience NSW was established in

Draft Shoalhaven City Council Submission on the Draft Illawarra Shoalhaven Regional Plan 2041

May 2020 and Council's commencement of its *Recovery into Resilience Plan* in November 2020.

Councils and communities need significant support to manage this issue in a proactive, coordinated, and timely way. Council requests the NSW Government to examine options to provide support through funding/provision of resources, increased training to upskill councils and communities, and direct planning and implementation activities.

This objective needs to more strongly acknowledge the significant risks and impacts presented by bushfire and confirm any work required regionally in response to the recommendations of the *NSW Independent Inquiry into the 2020 Bushfires*.

Closer consideration needs to also be given to Strategy 12.3 (risk-based approach to determining sea level rise) and any potential implications on or conflict with Council's resolved position regarding sea level rise.

Recommendations:

34. *Expand the proposed action to develop a resilience maturity matrix to inform land-use planning work to include infrastructure agencies and broader resilience planning through infrastructure delivery and maintenance.*
35. *Make an increased commitment to resilience planning through increased work, direct funding to increase council resources, and support measures such as training and specialist studies.*
36. *Update the objective to reflect relevant recommendations of the NSW Independent Inquiry into the 2020 Bushfires.*
37. *Discuss Strategy 12.3 further with Council to identify potential implications or conflicts regarding Council's existing resolved position in regard to sea level rise.*

Objective 13 – Increase urban tree canopy cover

This objective and its associated strategy are generally supported, however opportunities that are fostered in response need to consider the range of relevant impacts, including public/community safety.

Recommendations:

38. *Ensure that Strategy 13.1 identifies the need to also consider the range of relevant implications and impacts, including public/community safety.*

Objective 14 – Enhance and connect parks, open spaces and bushland with walking and cycling paths

Objective 14 deals with increasing access to public space through the provision of new spaces and enhancement of existing spaces, i.e., more than connecting spaces with walking and cycling paths. The work to create connected and accessible walking and cycling networks is set out in *Objective 28*.

The Department-led action to identify a Green Grid and priority projects is welcomed and the strategies proposed to enhance and increase local open space are supported. The council-led work in Strategy 14.1 can be reinforced with NSW Government action, including increasing or facilitating access to government-owned land, direct delivery of projects, co-funding council delivery of projects and continuing current funding programs and other partnerships with councils (e.g., *Streets as Shared Spaces* and *Public Spaces Legacy*).

Draft Shoalhaven City Council Submission on the *Draft Illawarra Shoalhaven Regional Plan 2041*

Recommendations:

- 39. Review the current name of this objective to ensure its relevance to its associated strategies and remove any duplication with later objectives.*
- 40. The objective should also confirm the NSW Government's commitment to improving access to open space, including the identification of current and ongoing funding programs.*

Objective 15 – Plan for a Net Zero region by 2050

This objective and its associated strategies have merit and are generally supported.

Objective 16 – Support the development of a circular economy

This objective recognises the high levels of industrial activity in the overall region and the opportunity to develop a circular economy. As the circular economy is an ongoing focus for Council, this objective and its associated strategy are supported.

It also notes further work is required to better understand the feasibility of opportunities, maximise efficiencies, share resources, reduce operating costs, and improve environmental outcomes. Such work should be confirmed with an Action, noting the opportunity for a range of land-use planning activity to help support and grow this emerging industry.

Recommendations:

- 41. This objective should also action the stated region-wide work to gain a better understanding of the opportunities provided by a circular economy and any land-use planning activity required to support it.*

Draft Shoalhaven City Council Submission on the Draft Illawarra Shoalhaven Regional Plan 2041

Objective 17 – Secure water resources

This objective and associated strategy are generally supported given they reflect existing and ongoing work that Council has been undertaking.

Objective 18 – Provide housing supply in the right locations

Whilst the focus on enabling ongoing opportunities for new housing in strategic centres is recognised and welcomed, the need to provide an ongoing level of supply in a range of centres is important given the role that housing and associated building play in the economy of many areas. The ability through Strategy 18.1 for Council to continue to identify appropriate urban growth areas through its ongoing strategy work is supported as a result.

Regarding the Nowra Bomaderry Growth Area map (page 65):

- The status of the northern part of the Crams Road urban release area (URA) should be clarified – this area currently has a ‘deferred’ zoning and is the subject of a Planning Proposal. As such, its final footprint is unresolved.
- The placement of the indicative ‘biodiversity corridor’ requires reconsideration as it currently sits over existing residential subdivisions, Cambewarra Village and cleared pastureland.

Given Council’s recent experience with the Housing Acceleration Funded project for a critical new roundabout on Moss Vale Road associated with the two key regionally significant release areas in this location, Strategy 18.3 is strongly supported, and Council looks forward to the Department’s assistance in this regard.

Recommendations:

- 42. Adjust the Nowra Bomaderry Growth Area Map (page 65) to reflect the status of the Crams Road URA and reconsider/clarify elements of the indicative ‘biodiversity corridor’.*

Objective 19 – Deliver housing that is more diverse and affordable

Inclusion of a focus on affordable housing was surprisingly missing from the current/previous Regional Plan. The Councils in the region have however been proactive in this regard and as such the proposed objective and associated strategies are strongly supported. The proposed Affordable Housing Roundtable has merit and will hopefully assist with meaningful change and progress on this issue.

Any proposed affordable housing targets will need to be economically practical and need to consider local circumstances, development economics etc. The Department is requested to undertake or commission urban feasibility modelling to help inform the testing and development of affordable housing development contribution schemes and targets across the region.

Recommendations:

- 43. The Department should adapt (and update) the use of its urban feasibility modelling or prepare and commission a contemporary replacement to assist in the testing and development of affordable housing development contribution schemes and possible targets in the region.*

Objective 20 – Establish a shared vision for the future of Bombo Quarry lands

Noted – no comments offered.

Draft Shoalhaven City Council Submission on the *Draft Illawarra Shoalhaven Regional Plan 2041*

Draft Shoalhaven City Council Submission on the Draft Illawarra Shoalhaven Regional Plan 2041

Objective 21 – Respond to the changing needs of local neighbourhoods

This objective and its associated strategy are generally supported and can be practically considered in Council's relevant future work.

Objective 22 – Embrace and respect the regions local character

Council supports this objective and associated strategies. This objective should acknowledge the significant body of work also underway to develop new planning controls, including a local character overlay and draft local character clause. It should also confirm the timing for this work and the conditions for councils' use of the proposed overlay and clause.

Recommendations:

- 44. This objective should outline the new planning controls being developed to manage how new development contributes to local character, including the likely timeframes and conditions of use by councils.*

Objective 23 – Celebrate, conserve, and reuse cultural heritage

This objective and associated strategy are generally supported and can continue to be practically considered in Council's relevant future work.

Objective 24 – Support major events, public art, and cultural activities

This objective and associated strategy are generally supported and can continue to be practically considered in Council's relevant future work.

A smart, connected, and accessible region

The following objectives all sit under the theme: 'A smart, connected and accessible region'. Given their nature and consent they need to be considered alongside and be consistent with the content of the Draft Illawarra-Shoalhaven Regional Transport Plan that has also been released by Transport for NSW.

Objective 25 – Collaborate to leverage opportunities from Western Sydney's growth

This objective and associated strategy is generally supported.

Objective 26 – Create fast rail connections between Greater Sydney, Wollongong, and Nowra

This objective and the identified collaborative activity are strikingly supported. Improving connections and the quality and timing of rail services will make a significant contribution to improving the region's economy and lifestyle.

This objective should be expanded beyond creating faster connections and improved services. It should action work on the future planning for key stations and the centres within which they sit, including Berry and Bomaderry. This will help identify any opportunities in these centres to possibly contribute to housing supply and employment opportunities or provide public domain improvements to encourage the use of public transport. Noting the likely catalytic effect caused by infrastructure delivery, options for value capture to help fund planned upgrades should also be investigated. Such work also enables the identification, reservation and acquisition of any land required for upgraded lines and stations, including for transport interchanges and car parks.

Draft Shoalhaven City Council Submission on the *Draft Illawarra Shoalhaven Regional Plan 2041*

Recommendations:

45. *Include an Action to undertake master planning, value capture, and land reservation investigations for key relevant centres along the upgraded rail line to inform future land use planning decisions.*

Objective 27 – Protect major freight networks

This objective and the associated strategy are supported. However, the role that the NSW Government can and should play in protecting and improving major freight networks should also be recognised.

Objective 28 – Create connected and accessible walking and cycling networks

This objective and the associated strategy are supported.

Objective 29 – Utilise smart infrastructure to drive resilience, prosperity, and vibrant places

This objective and the associated strategy are supported.

Objective 30 – Prepare for mobility changes that improve connectivity and sustainability

This objective and the associated strategy are supported. However, in regard to Strategy 30.2, the NSW Government needs to continue to take a growing role in this regard and also consider providing funding incentives and similar to actively encourage the take up of growing and emerging forms of transport.

Interaction with Local Strategic Planning Statements

The current NSW strategic planning system provides opportunities for councils to identify key land use planning challenges and the work proposed to address them in Local Strategic Planning Statements. These matters need to be considered during the development and implementation of the regional plan and regional planning activities. To help improve the interpretation of the plan and explain its interaction with local planning activity, the published plan should include a summary section demonstrating how the final set of objectives, actions and strategies in the draft Plan have been influenced by the four local strategic planning statements recently delivered for the region.

The likely publication of the Regional Plan towards the middle of 2021 will trigger an update or review of adopted Local Strategic Planning Statements. As a minimum, the Department should confirm its expectation for this to occur to ensure strategic planning documents are aligned in a timely manner.

Given that Council finalised its first Local Strategic Planning Statement in November 2020, as a result this could mean a period of about 8 months between finalisation and a potential first review arising from the new Regional Plan. Council made repeat representations to the Department stating its:

- preference to develop its first Local Strategic Planning Statement at the same time as the revised Regional Plan, and
- concerns of applying resources to align its Local Strategic Planning Statement with the current Regional Plan despite its pending review.

In response, Council requests the NSW Government to support the update of its Local Strategic Planning Statement following the publication of the Regional Plan (like the funding

Draft Shoalhaven City Council Submission on the *Draft Illawarra Shoalhaven Regional Plan 2041*

provided to some Greater Sydney councils following publication of District Plans). This would assist greatly in delivering contemporary Local Strategic Planning Statements, the technical analyses required by the proposed strategies in the draft Plan and amended planning and development controls – all key elements in the implementation of the new Regional Plan.

Recommendations:

- 46. Provide a summary of how the draft Regional Plan has considered and responded to the land use planning matters and work set out in the four local strategic planning statements prepared for the region.*
- 47. Confirm the expected timeframe for the review and update of local strategic planning statements to align with the published regional plan.*
- 48. Strengthen the Department's commitment to implement the plan by providing support for councils to update recently adopted local strategic planning statements and planning and development controls where needed/required.*

Concluding Comments

Council is committed to working with the Department to finalise the Regional Plan and ensure that it is workable for all those that have a role in its implementation. In this regard, the overriding concern is the number and the form/content of the strategies that rest with Councils to lead or implement. It is imperative that this is discussed further in accordance with the detail provides in this submission before the Plan is finalised. Council looks forward to further detailed dialogue in this regard. Council is also keen to ensure that the final Plan will facilitate and accommodate the ongoing strategic planning work it has planned for Shoalhaven.