



13 December 2020

Milton Branch

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NSW Government
Department of Planning, Industry and Environment

Via email to: Illawarra@planning.nsw.gov.au

Dear Sir/ Madam

COMMENTS ON THE DRAFT ILLAWARRA SHOALHAVEN REGIONAL PLAN 2041

This is a submission by the National Parks Association NSW (NPA) Milton Branch regarding the draft Illawarra Shoalhaven Regional Plan 2041 (Regional Plan). We welcome the opportunity to comment.

The NPA Milton Branch is a non-government, non-political community-based organisation in the Shoalhaven. It is concerned with the preservation and protection of our natural environment and its enjoyment by future generations. As an organisation, the NPA endeavours to present a balanced and fact-based commentary on key matters of interest to us and our community. The Milton Branch has over 200 members and families and conducts regular bush walks and public lectures. It also provides volunteer assistance for other conservation activities in the area including track maintenance under the guidance of National Parks and Wildlife Service and rehabilitation of threatened plant species and ecosystems under the Department of Planning, Industry and Environment's Saving our Species program.

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General Comments:

As a general comment we found the Regional Plan to be heavily weighted to the Illawarra region and most references to the Shoalhaven region were focused on Nowra. The area south of Nowra, make up about half of the Illawarra Shoalhaven region. The southern part is dominated by National Parks and State Forests plus the villages along the coast, where tourism, including eco and agri-tourism are important components of the economy.

In this regard, the Regional Plan does not adequately consider preserving the nature assets of this part of the Shoalhaven such as the coast line, the national parks or the state forests. In the context of sustainability and net zero emissions a healthy forest is paramount. Additionally, our tourist industry is dependent on a healthy environment, both marine and terrestrial and we would have expected that the protection of forests and the marine environment would be part of the vision for the Shoalhaven with details of how this will be achieved.

The major lead for implementing the regional plan falls onto the Councils and to a much lesser extent to DPIE. We are concerned that some of the major stakeholders in the Shoalhaven have not been identified nor included in this plan. National Parks and Wildlife Service and the Forestry Corporation are the custodian of much of the land in the Shoalhaven. To reach the objectives of the themes 'A Sustainable and Resilient Region' and 'A Region That Values Its People and Places' requires the inclusion and collaboration of all government departments and agencies with land tenures.

The Regional Plan contains some terminology that could be best described as "newspeak" jargon that requires some explanation, perhaps as an addendum at the end of the Plan. For example, terms such as "ecosystem of innovation", "internet of things", "industrial symbiosis" etc should be explained.

Specific Comments:

Specific comments on the draft regional plan are set out below and referenced by page number for your consideration.

We are surprised and disappointed that in Theme 2 'A Sustainable and Resilient Region', page 12, does not have an objective of protecting and enhancing biodiversity and connectivity of ecological systems.

On the Vision Map for the Illawarra-Shoalhaven on page 9, The biodiversity corridors that are outlined are insufficient to achieve sustainability of species and prevent extinctions.

The plan only identifies biodiversity corridors that run from north to south, along the existing National Parks. Biodiversity corridors also need to have strong, wide west to east connections, from the escarpment to the coast, that include all types of ecosystems. For example, the Jervis Bay area needs to be linked to Morton National Park (NP); the Conjola/Yatte Yattah area should be linked to the Morton NP; and Murramarang NP to the Budawang NP.

We support Objective 11: 'Protect Important Environmental Assets' on page 46 and we strongly support a Shoalhaven wide biodiversity assessment and action plan to protect biodiversity, connectivity, waterways and our coastline.

The biodiversity corridors identified in the Environmental Values Map on page 47, show many biodiversity corridors north of Gerringong but hardly any between Nowra and Milton and none (except for a miniscule patch) South of Ulladulla.

In the Shoalhaven, the National Parks link to the coast mainly through State Forests, which are being logged in short intervals, even after the 2019/2020 fire, that result in a loss of structural

diversity, altered plant communities, loss of hollow bearing trees and increase of fire risk. The RFS considers about 90% of the Shoalhaven as bush fire prone land.

On page 48 the plan talks about connecting the biodiversity corridors and strategy 11.2 and 11.3 state that the Council is the lead agency. This omits the major stakeholder of the Forestry Corporation. South of Nowra state forests cover the same or more land than council and private land combined.

A plan for the next 20 years should include how those forests will be protected and have a commitment to a transition from unsustainable and state-subsidised logging to sustainable and growing eco-tourism that provides a base for employment while at the same time allowing forests to recover from the fires and the wildlife to re-populate.

Similarly, there is a lack of commitment to a biodiversity corridor along the coast, where the pressure for development (urban, tourist, infrastructure) is the highest. Without a firm and binding commitment of keeping the connectivity between coastal National Parks, Reserves, private and council land we will lose the green belt along the coast that lets wildlife move and will also lose a major tourist asset.

The ability for wildlife to move north to south, and east to west is paramount to ameliorate the pressure from climate change and fires.

The blue highway (page 9, Vision Map), only refers to industry and movement on water, there is little mention of protecting the marine environment along the coast except a brief entry on page 50 where it states that sustainability is supported by the Marine Estate Management Act 2014 and the Marine Estate Strategy (2018 – 2028) We would have expected that the Regional Plan provide much more detailed objectives and strategies for the protection of the marine and coastal environment

We welcome the emphasis on increasing urban tree canopy cover (objective 13, page 53) and expect that The Shoalhaven City Council, through this plan, will be required to keep an inventory of mature urban trees and implement a permit system that allows monitoring of urban tree removal and commence a program of replanting. The current 45 degree rule allows the removal of urban trees without notification to the Council and is resulting in an alarming loss of urban tree cover, especially in the Milton/ Mollymook/ Narrawallee/ Ulladulla urban areas.

The Regional Plan on page 14, reports a housing supply shortage in the Ulladulla region. There is no breakdown of the type of housing available. This area has many vacant houses because of the high proportion of holiday homes. There is no shortage of houses, only a shortage of houses that are available to people actually living here, 27% of houses were vacant at the Census! This issue should be addressed with measures that encourages houses/ apartments to be primary residences and there should be an emphasis on minimising urban spread. A concept of urban growth boundaries has the potential to address these issues and is welcome.

The commitment to a net zero emission region by 2050 and a road map to achieve this is welcome but omits the role that public transport plays in achieving this goal.

The smart, connected and accessible region (p12, objective 26) seems to go no further South than Nowra! There is no mention how the growing Ulladulla Region will be connected to the two major cities of Wollongong and Canberra. Public transport to this region is woeful, it is currently not possible to travel to Wollongong and back in one day! There is no public transport for people working in Nowra. There is no public transport that would allow walkers or cyclists access to the tourist villages! Surely a regional plan for the next 20 years should outline strategies and actions that connect all of the Illawarra and Shoalhaven and in particular the regional significant centre of Milton-Ulladulla to the other regionally significant centres of Nowra and Wollongong but also to Batemans Bay and Canberra.

Thank you for the opportunity to comment and considering our input. We are looking forward to the revised regional plan. If you need further information regarding our submission, please contact me on [REDACTED]

Yours sincerely

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National Parks Association of NSW