ESKER PTY LTD

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16 December 2020

Department of Planning, Industry and Environment Locked Bag 5022 Parramatta NSW 2124

Dear Sir/Madam

RE: Submission in relation to draft updated Illawarra Shoalhaven Regional Plan 2041

We commend DPIE for its vision to create a vibrant, dynamic and sustainable region. While the report deals with many important matters, more focus needs to be placed on the implementation of its strategy to ensure that its vision is achieved. We are particularly concerned about the following:

Growth Servicing Plan

It is important that infrastructure planning should dovetail with urban release area planning. WDURA Stage 5 was rezoned in 2018 but still lacks wastewater trunk infrastructure or a clear timetable for delivery of such infrastructure. Therefore, the precinct has remained largely inactive. Unfortunately, there is currently a circularity problem in which developers wait for services before making investment decisions, and service providers (particularly Sydney Water) wait for developers before they commit to invest. It is the role of government to take the lead. Boosting the supply of development-ready land will quickly translate into more houses and progress towards meeting DPIE's regional housing targets (Objective 18.2).

Furthermore, supply is a key driver of affordability. Additional supply would place downward pressure on house prices and ensure that those who need homes can afford them. It will also ensure that Illawarra Shoalhaven maintains its important affordability margin relative to Sydney (Objective 19).

Biodiversity

Central to the appeal of Illawarra Shoalhaven is its natural beauty and unique biodiversity. While the plan speaks to the importance of protecting environmental assets, it is largely silent on the subject of ownership. Rehabilitating and preserving large green assets like bushland, riparian zones, etc. (typically zoned E2 and E3) is expensive and best done by government, rather than left in private ownership where owners either do not have the financial means or incentives to do so (Objective 11).

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Furthermore, and where appropriate, these assets should be available to be enjoyed by the local community, with walking and cycling tracks, etc (Objective 14). This can only be achieved if in public ownership. While the draft SIC does contemplate a Biodiversity budget, there needs to be more clarity around the allocation of these funds.

Should you wish to discuss this further, please do not hesitate to contact me.

