

17th December 2020

Mr Jim Betts
Secretary
Department of Planning, Industry & Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Draft Illawarra Shoalhaven Regional Plan Update and Special Infrastructure Contribution

Dear Jim

I write in relation to the draft Illawarra Shoalhaven Regional Plan update (draft Plan) and Special Infrastructure Contribution (draft SIC) placed on public exhibition by the Department of Planning, Industry and Environment (DPIE), for comment until 17 December 2020.

1. Draft Plan

The draft Plan is welcomed as an aspirational update to the existing Regional Plan. The Urban Taskforce welcomes the “resetting” of the plan to facilitate the continued growth of the Illawarra Shoalhaven region over the next twenty years.

The Urban Taskforce is broadly supportive of the strategies within the draft Plan that seek to:

- Strengthen Metro Wollongong as a connected, innovative and progressive city
- Grow Nowra and Shellharbour City Centres as regional cities
- Support regionally significant employment lands
- Develop a shared vision for the future of Bombo Quarry lands
- Unlock housing supply in West Lake Illawarra and Nowra Bomaderry
- Facilitate housing opportunities in existing urban areas
- Monitor regional land and housing supply

In relation to unlocking and facilitating housing supply, the Urban Taskforce **recommends** the draft Plan be amended to include specific housing targets for each LGA. This will allow for improved transparency in the monitoring of housing supply and thereby drive investor confidence in the delivery of new homes in the Region.

The Urban Taskforce **recommends** the Department takes an active and leading role in ensuring the implementation of appropriate strategic planning by local councils. There have been examples within the Region where outcomes on major proposals and planning strategies have been significantly altered (and likely undermined) by local politics. These outcomes have the potential to compromise robust, evidence-based strategic planning and create greater risk and uncertainty in planning outcomes for the region.

Boosting the supply, and the visibility of supply, of development-ready land will quickly translate into more houses and progress towards meeting DPIE's regional housing targets. Furthermore, housing supply is a key driver of affordability. Additional supply will 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.

2. Draft SIC

Of critical importance to the success of the region will be co-ordination of infrastructure planning with urban release area planning.

Some Urban Taskforce members are concerned about the capacity for co-ordinated and timely delivery of local and state infrastructure given what has transpired in the West Dapto Urban Release Areas (WDURA). Stage 5 of the WDURA was rezoned in 2018 but still lacks wastewater trunk infrastructure or a clear timetable for delivery. Without the provision of infrastructure - the precinct remains largely inactive.

Urban Taskforce members are increasingly reporting a 'chicken and the egg' type problem where developers are waiting for services before making investment decisions, and service providers (such as Sydney Water) are waiting for developers before they commit to investing in infrastructure provision. Urban Taskforce **recommends** DPIE takes the lead in the co-ordination and timing of land release and infrastructure planning.

The Urban Taskforce acknowledges the need for the Illawarra Shoalhaven region, and in particular the new growth areas, to be properly serviced by local and state infrastructure, and support in principle that new development providers should contribute to this. However, the issue of the total quantum of development fees and charges and the impacts on the feasibility of development needs to be closely considered prior to finalising the SIC.

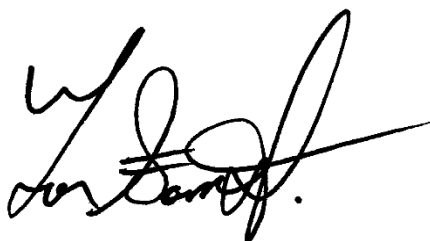
To boost the Region's post COVID-19 recovery through local investment and employment opportunities the Government should, at least in the short term, consider subsidising the SIC. Accordingly, Urban Taskforce **recommends** that DPIE reviews the proposed SIC in the context of the relevant councils' local contribution

plans and the need to expeditiously drive construction activity within the Illawarra Shoalhaven region.

Consistent with the draft Plan's objective of protecting important environmental assets, the draft SIC includes a bio-diversity allocation for land within West Dapto growth area. However, both the draft Plan and SIC are unclear on the subject of ownership of the environmentally protected land. Some Urban Taskforce members are concerned about the cost of rehabilitating and preserving these large green assets and feel that this would be best undertaken by Government for the use and enjoyment of the broader community.

Urban Taskforce is available for additional engagement in finalising the draft Plan and SIC so that the aspirations of the Draft Illawarra Shoalhaven Regional Plan and future development opportunities can be realised.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Forrest', with a long horizontal flourish extending to the right.

Tom Forrest
Chief Executive Officer