



Australia's property industry

Creating for Generations

4 August 2020

Mr Stephen Dunshea
Chief Executive Officer
Shoalhaven City Council

Email to: council@shoalhaven.nsw.gov.au

Dear Mr Dunshea

Shoalhaven City Council – Local Strategic Planning Statement

The Property Council of Australia welcomes the opportunity to provide comments on Shoalhaven City Council's draft Local Strategic Planning Statement (LSPS).

As Australia's peak representative of the property and construction industry, the Property Council's members include investors, owners, managers and developers of property across all asset classes. We also represent a diverse group of members spread across all parts of the Illawarra and Shoalhaven region.

The Property Council supports the position taken by the NSW Government to use the LSPS as a mechanism for the translation of and "give effect" to *Community Strategic Plans* and the *Illawarra Shoalhaven Regional Plan*. A LSPS should identify a range of steps Council must take in planning for the city's future and the priorities to achieve its vision.

Overall, we support the aspirations of Council for the next 20 years to enable the Shoalhaven to become a strong, diversified region providing local jobs and supporting growth and investment. We encourage Council to continue working closely with the property industry, local business and other NSW Government agencies to deliver the plans and strategies as outlined in the plan.

The creation of an internal Strategic Planning Implementation Advisory Committee to ensure the whole of organisation commitment to these planning priorities and actions is a positive step and we encourage the continuous monitoring and review of these actions with targeted measures put in place.

Our members look forward to the finalisation of Council's LSPS and working with you to achieve the actions as stated in your LSPS. We acknowledge the already collaborative working relationship with Shoalhaven City Council and work that has been done to date with industry to collate feedback and input.

Comments on specific parts of the draft LSPS are provided in the following submission.

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Should you have any questions, please do not hesitate to contact myself on 0437 315 198 or Troy Loveday, Senior Policy Advisor on 0414 265 152.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Michelle Guido', with a stylized flourish at the end.

Michelle Guido
Illawarra Regional Director
Property Council of Australia

Themes	Property Council Response
<p data-bbox="143 236 741 300"><u>Planning Priority 1 – Providing Homes to address needs and lifestyle</u></p> <p data-bbox="143 344 589 371">A1.1 Prepare a local housing strategy</p> <p data-bbox="143 416 712 512">A 1.2 Update development controls to facilitate increased delivery of accessible and adaptable homes</p> <p data-bbox="143 557 683 620">A 1.3 Develop and test an affordable housing development contribution scheme</p>	<p data-bbox="779 236 2047 443">The Property Council is generally supportive of the priorities and associated actions relevant to housing. Considering the affordability issues being experienced by many, and the great need for more social and affordable housing, we welcome the Council’s plans to implement a Local Housing Strategy. Our members welcome policies that incentivise partnerships between the public, private and social housing providers and can lead to the creation of new opportunities to assist to deliver on the housing needs of the community.</p> <p data-bbox="779 488 2047 730">It is important that as the population ages, there is also a wide choice of housing options designed for the needs of seniors. This may include small accessible dwellings at ground level and specialised accommodation for seniors including retirement villages and aged care facilities. Feedback from our members who own and manage facilities in the retirement living sector indicate there is growing demand for this product, but supply is very limited due to restrictive planning controls and a lack of suitable sites where land zoning permits this type of development. Council should investigate how its planning controls can be amended to provide opportunities for more suitable seniors housing.</p> <p data-bbox="779 775 2047 1018">The NSW Government has also rightly identified the need for more housing to be provided in the categories known as the Missing Middle. Council should look at how it can also encourage other forms of Missing Middle development through its updated planning controls. Council may be aware of many of the benefits that can be gained for a community by ensuring that Missing Middle development is delivered. The NSW Government has recently released an EIE for a new Housing Diversity SEPP. We encourage Council to review its planning controls to identify any obstacles to the delivery of wide choice of housing for residents.</p> <p data-bbox="779 1062 2047 1198">We support council’s work to review planning controls around town centres and increasing density and it is our hope that LEP and DCP reviews are carried out in consultation with industry in order to enable the effective and practical delivery of more diverse housing in line with a future Local Housing Strategy. We look forward to further engagement as these steps commence.</p>
<p data-bbox="143 1244 696 1272"><u>Planning Priority 2 – Delivering Infrastructure</u></p> <p data-bbox="143 1316 589 1380">A2.1 Prepare an updated Community Infrastructure Strategic Plan</p>	<p data-bbox="779 1244 2011 1305">The Property Council is generally supportive of the actions listed and encourage the implementation of actions for inclusive and connected communities.</p>

<p>A2.2 Prepare an updated Integrated Transport Strategy and Pedestrian and Mobility Action Plan</p> <p>A2.3 Develop, consult and implement a plan to recycle ageing and underutilised community infrastructure</p> <p>A2.4 Investigate sites for new cemetery facilities</p>	<p>We encourage Council to continue their work in preparing an integrated Transport Strategy and advocating for enhancement and expansion of transport connections and services to ensure there is accessible and available transport connections in local communities. Strategic planning in relation to the Nowra CBD and the way in which people travel in and out of the main CBD should also be considered, as the main hub for the South Coast region, its connection to other parts of the South Coast and the Illawarra is critical.</p> <p>The Property Council is also supportive of initiatives that encourage and facilitate authentic Transit-Oriented Development (TOD). TOD includes moderate to high density development (residential, commercial, retail etc) within proximity to public transport routes. TOD also facilitates sustainable public transport and improves accessibility to goods, services and employment.</p> <p>It can also deliver more affordable, compact, sustainable housing that ensures that the vulnerable, the ageing and skilled workers in our community are able to live close to transport routes, close to work, health, retail, education and recreational opportunities without requiring private transportation.</p>
<p><u>Planning Priority 3 – Protecting and enhancing neighbourhoods</u></p> <p>A3.1 Update Shoalhaven Development Control Plan 2014 with built form statements to ensure in-fill development contributes to neighbourhood character</p>	<p>Property Council is generally supportive of the actions listed and looks forward to working with Council to ensure the local character of townships are sustained while continuing to provide in-fill development where appropriate. We encourage council to work with the industry to achieve this goal with continuous consultation and input important to the success of this priority.</p>
<p><u>Planning Priority 4 – Nowra City Centre</u></p> <p>A4.1 Review the Nowra CBD Revitalisation Strategy and Nowra CBD MasterPlan</p> <p>A4.2 Prepare a strategy to inform actions to encourage and support nighttime economy</p>	<p>Property Council is very supportive of this priority and actions list and strongly encourage a review of the Nowra CBD Masterplan and Revitalisation Strategy. This is something in which Property Council and its Committee has long been advocating for with Shoalhaven Council and look forward to continuing working with Council on this initiative.</p> <p>Strategic planning for the future of Nowra CBD is vitally important for the future economic, social and cultural vibrancy of the LGA. A review of the urban design and planning controls of the CBD provides the opportunity to not only revitalise these commercial & social centres, but also to provide further housing options within the city centre close to services and amenities. Council should engage with urban designers, commercial/retail economists & the development industry to discuss the mechanisms that will encourage</p>

	<p>development, to eliminate unnecessary cost impediments and so enable the revitalisation to be achieved. We urge council to test planning controls to ensure that development within CBD is feasible and gain feedback from the development industry.</p> <p>We would recommend creating a panel or taskforce to assist in the review of the CBD plans in order to ensure that industry and business are inputting into this process to ensure that we are creating an inclusive, vibrant and connected hub for the people of Shoalhaven. Working with key stakeholders during this process will be vital to ensuring any changes or initiatives introduced are tested with the industry. We look forward to the next steps in this process and a collaborative approach to this review.</p>
<p><u>Planning Priority 5 – Ulladulla Town Centre</u></p> <p>A5.1 Prepare a masterplan to guide the future development of Ulladulla Town Centre, focussing on the harbour precinct, main street, and ways to improve traffic and parking.</p>	<p>Property Council is supportive of the priorities and actions listed and recognises the importance of Ulladulla Town Centre and its importance to the southern part of the region as a hub for local communities. Many of the towns and villages in the Shoalhaven, including Ulladulla, derive many benefits from tourism. We support and encourage Council to work with local tourism operators and accommodation providers on the future development of these places.</p> <p>We support the need to implement policies and strategies that support appropriate jobs in town centres such as Ulladulla, as these centres still provide retail, commercial and hospitality jobs that are vital to our local economy. We encourage Council to review the masterplan and undertake relevant retail/services studies which help to create a vision on how this important centre can support the Nowra CBD.</p>
<p><u>Planning Priority 6 – Providing jobs close to home</u></p> <p>A6.1 Review planning and development controls around the Shoalhaven’s towns and villages</p> <p>A6.2 Prepare and Employment Lands Study</p> <p>A6.3 Develop job performance objectives for new urban release areas</p>	<p>The Property Council is generally supportive of the actions identified and encourages council to continue their work in providing more opportunities for jobs and investment in the LGA. The focus on the growth of the Shoalhaven and preparing the region for the next 20 years is vital and look forward to next steps in this process and collaboratively working with Council.</p> <p>We support the preparation of an Employment Lands Study to ensure adequate supply of commercial and industrial zoned land is available for the next 20 years to allow for local employment opportunities. Developing a long-term plan to unlock the supply of industrial lands across the LGA and facilitating the redevelopment of large disused industrial sites is essential. We would like to continue working with Council to explore this further and encourage you to engage with the industry to assist in updating planning policies, streamlining processes and developing underutilised employment lands.</p>

<p><u>Planning Priority 7 – Strengthening commercial centres</u></p> <p>A7.1 Undertake a retail study for commercial centres</p> <p>A7.2 Undertake a program of place-based planning exercises for Shoalhaven’s commercial centres</p>	<p>Property Council supports the actions listed and the need to undertake specific retail studies of commercial centres to ensure the right mix of floor space is available that meets demand over the next 20 years. Considering the changes impacting retail over the last few years and now with COVID-19 also at play, it will be vital to undertake these studies and make decisions on a solid evidence base.</p> <p>As mentioned above, we support the need to implement policies and strategies that support appropriate jobs in town centres, and we encourage Council to review the town plans in line with a retail centre study. We look forward to the next steps in the process and working with Council on these actions.</p>
<p><u>Planning Priority 8 – Promoting a responsible visitor economy</u></p> <p>A8.1 Review planning and development controls for tourist and visitor accommodation</p> <p>A8.2 Review and ensure consistent and appropriate planning controls for existing caravan parks and campgrounds.</p> <p>A8.3 Identify the infrastructure and servicing requirements to support sustainable tourism hubs.</p> <p>A8.4 Facilitate appropriate tourism uses on Aboriginal owned land to increase economic participation on country</p>	<p>Property Council generally supports the actions identified and support steps to provide further opportunities for an expanded tourist and visitor economy. Tourism is positioned as a source of employment and drawcard for investment for the area from allied and supporting industries. Council should take a proactive position seeking to increase tourist activity while also enhancing liveability and maintaining local character of the area.</p> <p>We would also encourage Council to consider wider employment opportunities and the benefits this could bring to the local area and community. There may be further options for creative types of industries or entrepreneurial types of businesses, as well marine based industries that could diversify the economy.</p> <p>We would like to see continued strategic planning around this planning priority to support jobs, tourism and an activated economy and look forward to the next steps in this process and working with Council collaboratively to input into reviews of development controls and plans for increasing opportunities for the visitor economy.</p>
<p><u>Planning Priority 9 – Supporting agriculture and aquaculture</u></p> <p>A9.1 Prepare a rural lands strategy to identify strategically important resource lands and the land use planning mechanisms to support viable agricultural activity.</p>	<p>Property Council generally supports these actions under this planning priority. We also encourage Council to support rural tourism and direct intervention to promote the development of sustainable rural tourism with things such as the introduction of a new LEP definition of “<i>produce door premises</i>”.</p>

<p><u>Planning Priority 10 – Industrial and defence related opportunities</u></p> <p>A10.1 Undertake a strategic review of industrial land to understand and respond to future demand for industrial activities and urban services.</p> <p>A10.2 Development of an activation strategy for industrial zoned land to coordinate planning, investment and infrastructure delivery.</p>	<p>Property Council generally supports the actions identified and a review of industrial lands to ensure the planning framework supports the expansion of employment and broaden the range of business and industry sectors.</p> <p>We would also encourage Council to consider wider employment opportunities and the benefits this could bring to the local area and community. There may be further options for creative types of industries or entrepreneurial types of businesses to be located in the region.</p>
<p><u>Planning Priority 11 – Protecting the environment</u></p> <p>A11.1 Develop a strategic conservation plan, including biodiversity mapping, to confirm areas of high environmental value with appropriate land-use zones and protect them with controls to manage development.</p>	<p>Property Council is generally supportive-in-principle of these steps, with consideration of the impacts on the property industry keeping in mind any additional costs that could be incurred, processes and how council engages with the industry to consider the environment in planning proposals. We look forward to further engagement and consultation with Council as these actions are initiated and considered.</p>
<p><u>Planning Priority 12 – Adapting to natural hazards</u></p> <p>A12.1 Preparation of Resilience Action Plans for settlements and areas considered susceptible to isolation or at risk from floods and/or bushfire.</p> <p>A12.2 Development of an Urban Greening Strategy to address the management of and increase green infrastructure in urban areas.</p> <p>A12.3 Review development controls to encourage construction techniques to improve the thermal</p>	<p>Property Council is generally supportive of the actions to deliver Planning Priority 12. In particular we look forward to the opportunity to provide specific feedback in respect of any detailed proposals regarding the identification and mapping of natural hazards, resilience action plans and other energy efficiency measures. It is important that Council provide clear advice to landowners and proponents on the impacts of these plans and policies so that they can take them into consideration when developing proposals.</p>

<p>comfort of new buildings.</p>	
<p><u>Planning Priority 13 – Managing resources</u></p> <p>A13.1 Develop an updated Sustainability Action Plan.</p> <p>A13.2 Prepare an Emissions Reduction Strategy.</p> <p>A13.2 Review planning controls to secure the future operation and land requirements of waste management facilities.</p> <p>A13.4 Review development controls for medium- and high-density residential development to require efficient and sustainable waste sorting facilities.</p>	<p>Property Council generally supports the actions identified and we look forward to the opportunity to provide specific feedback in respect to Council’s Sustainability Action Plan and waste management strategies, while considering input from industry on the implementation of these measures.</p>
<p><u>Planning Priority 14 – Heritage items and places</u></p> <p>A14.1 Council will establish a Heritage Design Advisory Service to provide expert advice.</p> <p>A14.2 Council will update the European Heritage Study</p> <p>A14.3 Council will develop a heritage interpretation program for selected settlements.</p> <p>A14.4 Council will develop a conservation management plan</p>	<p>Property Council understands that like many areas across the South Coast, the Shoalhaven is home to unique natural and built heritage assets, and we are supportive-in-principle of these steps and looks forward to further engagement and consultation with Council as these actions are initiated.</p>

<p><u>Planning Priority 15 – Scenic and cultural landscapes</u></p> <p>A15.1 Council will identify scenic and landscape values and develop controls to protect and enhance these values, starting with the Cambewarra Escarpment.</p>	
<p><u>Planning Priority 16 – Promoting events and public art</u></p> <p>A16.1 Council will review planning controls to promote and support events to activate public spaces, including sporting facilities.</p>	<p>Property Council is supportive of the actions listed and encourage further opportunities for local events to activate the Nowra CBD and other town centres within the LGA, supporting the visitor economy and further opportunities for local jobs. We look forward to the next steps in this process.</p>