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Submission to the public exhibition of the draft South East & Tablelands Regional Plan 2041

Introduction

Wingecarribee Shire Council appreciates the opportunity to comment on the draft South East and Tablelands Regional Plan 2041 (the draft Plan) currently on public exhibition.

Council is supportive of the Department's commitment to working with Council on important strategic planning projects, including developing an affordable housing strategy for the region and place-based master plans for the Bowral-Mittagong-Moss Vale strategic cluster.

Council generally supports those priority actions for the Region (p16) relevant to Wingecarribee Shire, recognising that each provides a valuable contribution to the strategic framework for future management of the Region. It is understood that some of these actions would be better addressed earlier rather than later within the cycle of the Regional Plan, while others are longer term and would evolve as the Plan progressed. It is assumed that, although the Regional Plan has a 20-year time frame, it will continue to be reviewed every five years.

Sub-regions

The draft Plan introduces three (3) sub-regions, being the Tablelands, Capital and Alpine and Far South Coast sub-regions. Council questions the logic of sub-regions, and is unclear as to the purpose, and therefore the need, for sub-regions.

Wingecarribee Shire is part of the Tablelands sub-region with Hilltops and Upper Lachlan Local Government Areas (LGA). While it is acknowledged that the Tablelands sub-region contains the northern-most LGAs, the Wingecarribee Shire has limited economic or land use planning relationships with the Tablelands sub-region. It is noted that Wingecarribee Shire is its own Functional Economic Region (FER) with its own Regional Economic Development Strategy (REDS), and Council does not support being part of the Tablelands sub-region.

Wingecarribee Shire has always, and will continue to be more closely aligned with the former Sydney-Canberra Corridor LGAs, particularly in terms of population, agriculture and industry as well as through physical connections such as road and rail.

Working with you

If retained, Council considers that the draft Plan should adopt a consistent approach to identifying cross sub-region pressures or opportunities. Council’s preference however is that there be no sub-regions at all, especially as the current arrangement seems to be working well.

Alignment with the Vision for the Region

The draft Plan correctly identifies the COVID-19 pandemic and climate change as the two most relevant global ‘drivers of change’ in terms of future strategic planning within the region. References to climate change emphasise the urgent need for recognition and action to ameliorate a broad range of potential consequences. Within this context, Council supports those strategies which seek to ensure new development is located to minimise any adverse impacts on the environment in all its manifestations.

The introduction to the draft Plan recognises that *the South East and Tablelands Region (is) Australia’s most geographically diverse natural environment.* (p6). This observation particularly applies to Wingecarribee Shire. Virtually all of the Shire is within the Sydney Drinking Water Catchment, and much of the remaining land is additionally constrained in some way. Almost 50% of the Shire comprises national parks and nature reserves, including the addition of over 2,500ha through the recently created Guula Ngurra National Park to support one of the most significant koala habitats within the state. The Shire also contains significant waterways which Council believes would warrant the same focus and attention in the draft Plan currently reserved for coastal waterways.

There are almost 1,000 ha of land zoned Environmental Management as well as areas of productive agricultural land much of which also contains areas of threatened and endangered ecological communities. Correlating with these natural areas are areas of high bushfire and flood threat. These were all mapped to provide the constraints context for the Wingecarribee Local Housing Strategy (LHS), reproduced as Figure 1 below.

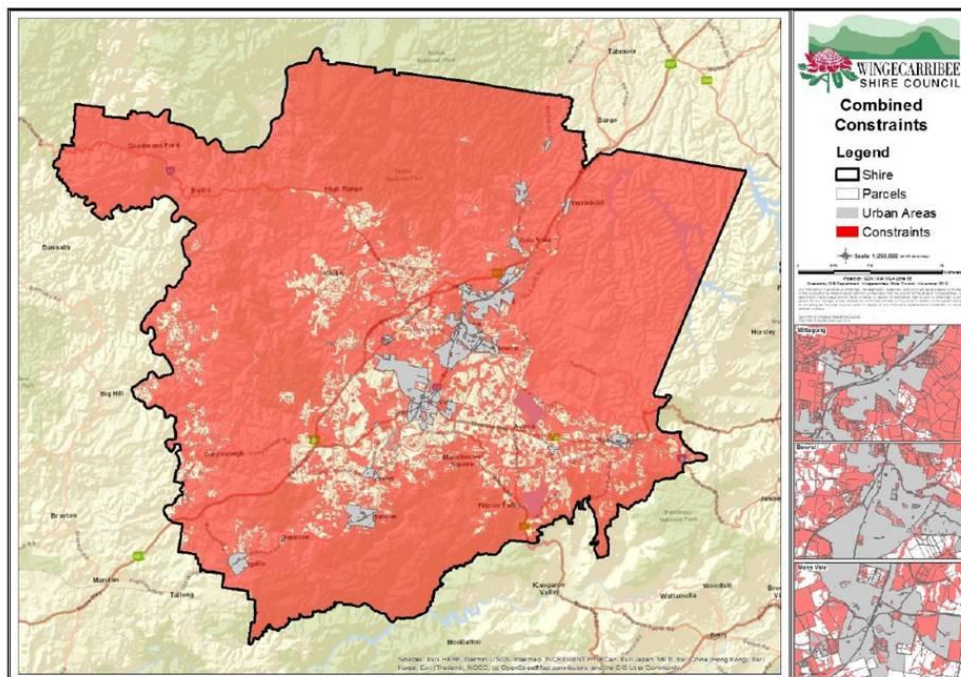


Figure 1 – Combined Mapped Constraints (Wingecarribee Local Housing Strategy)

Council supports the Vision statement - *By 2041, the South East and Tablelands will be recognised as a region of collaboration and innovation. Sustainable agriculture, tourism and renewable energy are key industries, and Country is recognised as a foundation for the region's future. Communities will play a significant role in unlocking the region's opportunities and potential, with the natural environment at the heart of planning and decision-making.* (p12)

However, careful consideration needs to be given to the wording of the Actions and Strategies contained within the draft Plan, to ensure there is a clear alignment between the Vision, Objectives, Actions and Strategies. By way of example, Council fully supports the comment in the draft Plan that, *in balancing the rich environmental values of this land, we recognise the need for an adaptive and considered approach to growth and change* (p6), and the need to balance such growth against *measures to enhance the value and protection of a natural environment that enriches lifestyles, sustains the region's water supply and protects biodiversity and productive agricultural land.* (p13). This commentary clearly aligns with the Vision and Objectives of the draft Plan.

Collaborative Action 17.2 states, *Work with councils and the Canberra Region Joint Organisation to develop a set of master planning principles that provide examples on how to address planning barriers to rezoning and developing residential land, in the context of high environment, cultural and heritage significance, important agricultural land and areas affected by natural hazards.* (p17). While it is acknowledged that the intent of this action is to build capacity within Council's to properly plan for residential land release, and to appropriately manage and protect site specific constraints such as areas of high environmental value. The wording of the Action implies that areas of high environmental value (as an example) are a 'planning barrier' to rezoning.

Council suggests that careful consideration be given to the wording of the Actions, and that the intent of the Actions is clearly articulated in the relevant sections of the draft Plan. Council recognises and appreciates the many competing and often conflicting elements inherent in developing a functional strategic framework and the need for 'balance', but potential (or perceived) conflicting views within the Regional Plan as to how those values will be managed could undermine the value of the strategic approach the Plan seeks to promote.

As the Minister notes in his Foreword (p5), *Strategic planning is vital ... and essential for the region's planning to adapt to changing needs and circumstances.* One concern Council does have is that all these separate 'strategic planning initiatives' could dilute the overall, relatively simple intent of strategic planning – to define a vision and create an actionable framework within which clear priorities are set consistent with that vision. A clearer rationalisation of these Actions would do much to allay community concerns regarding environment protection and Council's own concerns regarding hazard minimisation.

Managing Population Growth

The Wingecarribee Shire has experienced a higher than expected rate of population growth in recent years, undoubtedly influenced by the COVID-19 pandemic through which the introduction of working from-home-arrangements has enhanced the viability and attraction of regional areas as places of permanent residence.

In 2022, the DPE revised its previous (2019) population forecasts for each LGA within the State. For the Wingecarribee Shire, this has resulted in a significant increase in the forecast 2041 population. In December 2019, the Department forecast the Wingecarribee Shire population would grow to 52,000 people by 2041, whereas the 2022 forecasts now predict the Wingecarribee Shire population will grow to some 70,000 people by 2041 (higher than Council's forecast of 66,000 people).

Under the draft Plan, Wingecarribee is anticipated to accommodate almost 30% of the region's total estimated population growth (p10). Council appreciates that these estimates are not suggestive of population 'quotas' or 'mandates', but rather a prediction of population growth based on recent trends.

However, the past three (3) years have demonstrated that population forecasts represent a snapshot in time, and are heavily influenced by factors outside of Council or the Department's control. While it is unclear to what extent the recent rate of growth will continue, Council is committed to implementing the Local Housing Strategy, and ensuring that the local housing stock continues to meet the needs of the community both now and into the future.

The draft Regional Plan states that Council will need to plan for some 13,000 new dwellings to accommodate the anticipated 18,000+ increase in population out to 2041. This represents the provision of 1 new dwelling for every 1.4 persons increase in population.

Council has significant concerns about how the dwelling numbers were determined, and how they will be used in the Regional Plan. The stated 13,000 new dwellings required, is significantly higher than the DPE's own forecast dwelling demand of 9,544 dwellings based on the 2022 forecast and appears to have no basis. With the forecast occupancy rate, and a vacancy rate of approximately 10% (as outlined in the Departments projections), approximately 9,500 new dwellings would be required by 2041 to accommodate the forecast population growth (similar to the Departments own forecast dwelling demand of 9,544).

Council is confident that the actual housing needs (9,000 plus dwellings) can be accommodated in accordance with the adopted Local Housing Strategy, through infill development as well as within the identified six (6) New Living Areas and additional Investigation Areas, without the need to further expand beyond the identified town and village boundaries.

The Local Housing Strategy provided an evidence based planning framework to meet the long-term housing needs of the community, and planned for a surplus of housing supply, to ensure that, if population growth occurred at a faster rate than what was predicted, housing supply could be provided in a planned and orderly manner.

Council has significant concerns that including a baseless figure of 13,000 dwellings in the draft Regional Plan will undermine the Local Housing Strategy and will provide a pathway for speculative spot-rezonings, and unplanned development that undermines community confidence in the planning system.

It is Council's view that the dwelling targets are not required in the draft Regional Plan. Council has, and will continue to, plan for the housing needs of the local community in a strategic manner, including baseless dwelling targets in the draft Regional Plan only undermines Council's strategic planning which has included extensive research and consultation.

The Wingecarribee LHS identifies six New Living Areas based on excluding high value environmental and agricultural land as well as major hazards such as flood and bushfire (as mapped in Figure 1 above). Two additional endorsed Investigation Areas have also been identified.

Council is acutely aware of the need to optimise the development of these areas through innovative urban design and infrastructure and service provision. It is Council's intention to undertake appropriate strategic and infrastructure planning for all New Living Areas, and ensure that these areas are 'development ready' when key enabling infrastructure is provided. A concept master plan which demonstrates how each development will meet Council's housing objectives will need to be adopted together with an associated development control plan as provided for under Part 6 (Urban Release Areas) and clause 7.10 (Public utility infrastructure) of the Wingecarribee Local Environmental Plan (LEP) 2010.

It is Council's intention that the LHS is a 'living' document and that, as each New Living Area progresses, optimum use will be made of that land to provide an innovative & imaginative 'housing product' with a focus on quality urban design which delivers housing diversity supported by efficient and sustainable infrastructure and services. Council is also developing a housing monitor, to track housing supply against demand, to inform future reviews of the LHS.

It is also intended to enable some population growth to be accommodated through the gradual revitalisation of town and village employment zones with the same innovative & imaginative focus on urban design to deliver housing diversity supported by efficient and sustainable infrastructure and services.

Council strongly recommends that the draft Plan reference and support each Council's Local Housing Strategy as well as other key strategic documents such as the Local Strategic Planning Statement and the Community Strategic Plan (CSP). Support in the Regional Plan for these Council prepared and community endorsed documents would help reinforce the legitimacy of these strategies and would greatly assist Councils in ensuring that Planning Proposals and other proponent initiated applications also have due and genuine regard to these strategies.

It is the Regional Plan that provides the 'strategic merit' for any Planning Proposal. Overstated estimates are unhelpful, providing proponents with the opportunity to use, or misuse them for speculative Planning Proposals which places pressure on Council to include additional living areas in the LHS, or to increase existing urban densities. Even the knowledge that Council cannot progress those New Living Areas already identified within the LHS due to infrastructure and servicing limitations, does nothing to deter proponents from actively and persistently seeking to have additional sites included.

Infrastructure Provision

Council strongly supports the recognition of *the need for a coordinated approach to infrastructure provision that leverages resources and collaboration across state agencies* (p8).

The biggest challenge for regional Councils in achieving any form of development and growth is the planning for and funding of essential infrastructure and services, particularly water and sewer, needed to support that development. Wingecarribee Shire currently faces an acute need for additional infrastructure, particularly augmentation of the three principal town Sewage Treatment Plants at Mittagong, Moss Vale and Bowral as well as upgrading the Shire's Water Treatments Plants and trunk infrastructure.

This enabling infrastructure is critical to the implementation of the Local Housing Strategy, with development of New Living Areas unable to proceed in advance of significant infrastructure upgrades. The successful development of the Shire's economic base is also heavily reliant on adequate infrastructure including the Moss Vale strategic centre and the adjoining Southern Highlands Innovation Park (SHIP).

The SHIP is the largest employment precinct outside of the Western Sydney Aerotropolis and has the potential to support economic development and employment at a regional scale. However, unlocking the potential of this regionally significant employment precinct requires a strong commitment from the State Government in both the planning and provision of enabling infrastructure. While Council welcomes the commitment under the Regional Plan to investigate a regional jobs precinct for the SHIP, Council encourages the Department to play an active role in the planning and provision of enabling infrastructure for this regionally significant employment precinct.

Regional Councils are generally their own water and sewer authority and do not benefit from the assistance provided by authorities such as Sydney Water. Council will continue to advocate for the Department to play a greater role in the planning and delivery of essential infrastructure to unlock new living areas, support its own goals of providing regional housing supply in appropriate locations, and ensure that new communities are supported by essential infrastructure.

Council strongly supports the identified priority for the Southern Highlands strategic cluster, comprising the towns of Moss Vale, Bowral and Mittagong, to *investigate funding for infrastructure, and utilities to unlock and fulfil the economic potential of the Southern Highlands Innovation Park* (p24), noting that, *looking to 2041, strategic centres and clusters will be the focus for more intensive employment uses and public space improvements, as well as technology and transport connections to Canberra and Sydney. This will encourage investment, housing, job opportunities and services. Local centres also drive the regional economy and provide complementary services to support resident, visitor and worker populations.* (p77)

Heritage Management

One other aspect of particular significance to Wingecarribee Shire is heritage management. Council strongly supports acknowledgement of the importance of both Aboriginal and non-aboriginal local character, culture and heritage within the draft Plan. There are approximately 400 items of heritage

listed within the Wingecarribee LEP together with a further 17 heritage conservation areas and 10 archaeological sites. A further 400 properties are currently under consideration for future listing.

Council is aware that many aspects of local character, environment & heritage intersect with economic drivers across the region. For example, Council is supportive of initiatives to develop agritourism across the Shire, recognising that it offers rural land owners a potential income stream with many flow-on benefits throughout the economy. These opportunities and benefits help protect both the agricultural land itself and the environmental values they often include as well as benefiting the community and visitors through the rural pastoral landscape they support.

Council is also aware of the significant role heritage plays as a tourist attractor to the Shire, and this would certainly be true of much of the region. Although the Minister references 'heritage towns' in his Foreword, the draft Plan itself does not mention 'heritage tourism' as such, even though there are many locations across the region where heritage character is a major driver of tourism.

The Shire is also recognised as an area of great Aboriginal significance. Council supports *recognising and integrating Aboriginal culture and heritage into planning practice* (p8) provided this is done in full consultation with local Aboriginal knowledge holders and their communities and extends to all levels of the planning process. Collaborative Action 4.1, *Work with councils and NSW Heritage to undertake and implement heritage studies, including Aboriginal cultural heritage studies to inform local land use strategies* (p17), is strongly supported.

A Regional Plan must embrace a broad range of objectives and 'balance' is frequently necessary to manage competing and at times conflicting priorities. In general Council recognises that the draft Plan aims to deliver a meaningful connection to Country, improved environmental outcomes, a diverse economy, appropriate housing, and liveable communities supported by essential infrastructure, and Council supports these objectives.

However, careful consideration needs to be given to the wording of the Actions and Strategies contained within the draft Plan, to ensure there is a clear alignment between the Vision, Objectives, Actions and Strategies. Many of Council's concerns could be addressed through an 'edit' of the document to provide a more consistent 'voice' throughout, and to better clarify alignments and explain how potential inconsistencies could be managed.

Council thanks the Department for the opportunity to comment on the draft Plan and would be willing to engage further with the Department through the review process.

Yours sincerely

A solid black rectangular box used to redact the signature of Michael Park.

Michael Park
Executive Manager Strategic Outcomes

cc.

The Hon. Wendy Tuckerman, MP

Mr Nathaniel Smith, MP