The Planning Institute of Australia (PIA) is the peak professional body representing professions involved in planning Australia’s cities, towns, regions and places. PIA is a not-for-profit association delivering benefits to over 4,500 members nationally. Our members are drawn from a range of planning professions – urban and regional planning, social planning, urban design, environmental planning, economic development planning, transport planning and planning law. A large proportion of our membership is employed in local government.

The following submission is lodged on behalf of the NSW Division of the PIA and provides a collaborative response to the Draft Strategy, based on input from PIA NSW members, in particular members of the PIA NSW Illawarra and South Coast Branch.

General

The Department of Planning is commended on the considerable work undertaken to produce the Draft South Coast Regional Strategy.

PIA NSW strongly supports the preparation of Regional Strategies and welcomes this important indication for the future of development on the South Coast. With some reservations, we agree with the general thrust of the Strategy and endorse it as a framework within which statutory plans can be prepared. We consider that this is a better approach than the previous Regional Plans, which tended to take a more legalistic and dogmatic attitude towards directing local planning. Nevertheless, we believe that the Strategy ought to have more statutory importance than can be given through Section 117 Directions.

PIA NSW is also concerned that most of the elements of the draft Strategy do not provide adequate strategic direction for economic growth/re-direction and do not give a basis for how the key challenge of economic change in the region is to be handled, along with the challenge of an aging population.

Given that LEPs prepared in accordance with the Strategy are meant to be reasonably spatially specific, the generalities of the "strategies" do not give adequate guidance for developing local spatial strategies that can inform a good set of planning controls.

Furthermore, in light of recent regional strategies released by the NSW Government, PIA NSW is concerned that there is no consistent approach to regional planning in NSW. The fundamental approach to regional planning in the Draft South Coast Regional Strategy, which appears to be based on environmental sensitivity, is inconsistent with that used in the Draft Far North Coast Regional Strategy, for example, which appears to be based on growth management using urban containment boundaries.
Whilst it is acknowledged that each region of NSW is unique, with their own regional identities, and distinct environmental, community and landscape characteristics, there should be some degree of consistency in the approach to the planning of these regions.

**Specific Comments**

We would like to make a number of suggestions which we believe would improve the Strategy and make it more relevant and useful.

1. **It would be helpful if the role of the Region within the State were to be made explicit.** For example, the basis for the planned population increase is not stated, but it is down to only a third the rate of that over the past 25 years. One could hope that, given the constraints and counter-productive side-effects of the growth of Sydney, a more pro-active, planned policy towards decentralisation would be in evidence.

2. **The provision of infrastructure is absolutely fundamental to any planning proposal.** We appreciate that it may be inexpedient to include specific costed and scheduled proposals, such as have been prepared for the South East Queensland Regional Plan for instance, nevertheless it is essential that some idea of regional infrastructure is included – priorities for such elements as roads, housing, hospitals, higher education, ports, energy and communications. Where this is to be paid for by developers, the principles underpinning contributions should be spelt out.

3. **We support the commitment to protect the natural environment.** However, without the detailed background mapping being made public, it is difficult to make more specific comment. For example, why is there an Indicative Habitat Corridor along the eastern fringes of the South-East National Park west of Bega? We suggest that, in line with the government’s one document policy, Management Plans (eg Coastal or Riparian) ought to be incorporated into the appropriate Council statutory document, rather than being stand alone policies.

4. **The need to concentrate most new development within or adjacent to existing settlements makes sense, although some threshold analyses would provide better justification and might accelerate development in some settlements at the expense of others.** However, it is important to retain the traditional character of south coast towns and villages. Too much new development could change this significantly, for example in Berry.

5. **We believe that, at least in some parts of the region, there is an opportunity to continue this historic pattern by introducing new settlements in strategic locations, linked to arterial transport routes.** They could make use of lower land prices to pay for all the new infrastructure they might require. Such settlements could also incorporate sustainability principles much more easily than trying to retrofit existing villages.

6. **Affordable housing is an issue of enormous importance.** It is essentially a State Government responsibility, using fiscal rather than development control measures, yet the strategy has little to say on how it is to be tackled. Local Government can make very little impact on total need. Seniors Living Estates on the outskirts of towns are bad social and planning policy, making only a marginal contribution to affordable housing.

7. **To provide employment, the Strategy rightly places considerable emphasis on the availability of vacant industrial and commercial land.** However, most users of this land service local communities – the building and automotive trades in particular – rather than basic employment. The expectation that over three-quarters of the new households in the region will made up of singles and childless couples, primarily in the 65 + age group, implies that much new employment will be home based. This suggests a need for communications infrastructure and planning policies which encourage and support working from home.
8. The emphasis placed on tourism is appropriate. However, perhaps a more specific identification of the location of major tourism precincts would be helpful. The question of tourism cabins, facilities (eg restaurants or farm stays) and resorts outside the settlements is also one that needs some strategic direction.

9. The restriction on the proliferation of rural residential development is supported and this should be extended to the elimination of concessional lots. Where it is appropriate to provide some rural residential it should act as a buffer on marginal land to manage fire and weeds along a forest fringe. Restrictions on the fragmentation of agricultural land are supported as is the principle of the right to farm.

10. Energy is another crucial issue. Declining world oil supplies mean that there is a need to facilitate the transition to renewable energy. In the absence of a State Plan, the Strategy should specifically promote the decentralisation of power generation.

11. We are concerned by the two appendices which have been included. We suggest that the strategic components of the sustainability criteria ought to be included in the Regional Strategy proper and the remaining elements are standard planning practice.

12. We believe that the “expert panel” represents another layer of bureaucracy which is more likely to delay and confuse the process than facilitate development. If external strategic review is required that is beyond the remit of the Regional Office of the Department of Planning, then perhaps a more appropriate agency would be a component of the Regional Organisation of Councils, such as the Southern Councils Group. This would have the added advantage of locking local government more firmly into the regional planning process.

13. Implementation is to be primarily through local councils and state infrastructure provision. As noted, the plan ought to be much more specific about infrastructure provision proposals or there is no real strategy. It also would be helpful if the processes by which local plans are assessed for compliance with the Strategy were to be spelled out, and, specifically, the mechanisms for conflict resolution.

14. Finally, a major weakness is that none of the background papers justifying much of the Strategy have been made public. Also much depends on documentation which is not yet available, for example the State Infrastructure Strategy; Aboriginal Heritage Studies, Water Sharing Plans, or the Affordable Housing Strategy. Without this documentation it is difficult to comment further, and it is possible that some of our queries have been covered but not explicitly stated.

We trust that these comments will be of assistance in preparing the final South Coast Regional Strategy, and look forward working with the Department in the implementation of its policies and recommendations.