

The key matters raised by the CRJO are as follows:

**1. The Draft Plan Contains Complex Language and a Confusing Structure.**

The draft plan is a critical document that to be successful needs to be able to be read and understood by a very broad audience. The CRJO has had consistent feedback that the draft plan is not an inviting read, the structure is generally difficult to read and follow, is not formatted in a way that makes it easy to understand directions and respond strategically, and contains significant text, strategy and actions that represent the standard day to day planning functions of Councils. This issue is dealt with in more detail later in the submission. The impact of this unnecessary content is that it clouds the important and key issues that require focus to make and achieve meaningful change.

Some examples include:

- The use of Objectives, Supportive Initiatives, Strategies, Department-led Actions, and Collaborative actions is confusing, fails to achieve any sense of priority or resourcing. This is made more confusing by the repetitive nature that some of these matters are addressed in the document.
- The plan introduces terms and concepts that are emerging but may not yet be broadly understood. More detailed explanation of concepts such as circular economy and its applicability to region and blue-green grid would assist with understanding of the plan.

**2. Lack of Acknowledgment Towards the Resilience Plan that the State Government has Invested Significantly in.**

The CRJO in partnership with the State and Federal Government have developed a Resilience Blueprint that will guide all stakeholders to better solutions for disaster management. That documents highlight that we need to move away from the status quo. We need to ensure that resilience principles are incorporated and continuously improved upon as part of everything we do.

There needs to be a greater understanding of risk and recognising lessons learned as opportunities to grow resilience. We need to be empowering people and communities to have a role by harnessing local solutions to local issues.

We need to create change for a more resilient and climate-ready future that guides our focus and investment to adapt to a changing world and how we work together to do things differently toward a more resilient tomorrow.

**3. Lack of a Compelling Vision for the Region, that Excites Communities and Encourages Buy-In.**

It is essential that the plan has a strong and compelling vision that captivates and inspires the reader. The current vision is passive and if read without knowing what the draft plan relates to (NSW South East and Tablelands), it could be mistaken for many regions.

The vision statement appears to reflect on existing industries, such as the statement that “Sustainable agriculture, tourism and renewable energy are key industries”. The vision should be articulating the future we aspire to and are planning for while acknowledging those existing industries that are part of our future, the challenges they will face and how they will be addressed.

It is essential that the vision address the emerging and new industries and make strong confident statements about the future that recognises investment currently occurring and planned for the region, such as acknowledging that the South East is an important MTB and Adventure Tourism destination that with current and proposed funding will become a destination of National/International Significance.

The vision and the actions that support it need to set a clear agenda and create a strategy that provides industry the confidence they require to invest in the region. The current vision fails to achieve this.

#### **4. Alignment with other State Government Plans.**

The CRJO would like to see better clarity or alignment with other NSW Government Plans, and in the timing and funding of government programs - in particular, the Regional NSW Housing Delivery Plans (currently under preparation), the Regional Economic Development Strategy (REDS); the DSNSW Destination Management Plan, and the Regional Transport Plan.

This more integrated approach could also lend itself to a review of current government funding models that tend to be siloed and focused on the goals and objectives of a single arm of government or an issue rather than a holistic integrated approach to place. This will assist in facilitating better leveraging of Government funding in infrastructure to deliver stronger and broader economic outcomes. The opportunity also exists to visit the way in which events are funded through consideration of broader industry links (for example, oysters, wine) and benefits to create a more sustainable funding model for key regional events.

Without this clarity there is a risk of duplication and effort in the delivery of strategies and actions. For example, the development of the current RNSW Regional Housing Plan, and Collaborative Action 18.1 to develop a regional affordable housing strategy. The development of a regional housing strategy will require Local Government input and will come at a time when councils are struggling to address their own housing issues and develop responses to crisis. There are many agencies working on housing, and it is overwhelming at the Local Government level to have appropriate resources to engage in all of these disparate processes whilst at the same time developing our own strategy.

#### **5. Identification of Resources to Ensure the Implementation of the Plan is Successful.**

The successful implementation of the Plan will be dependent on its resourcing. In part the implementation will rely heavily on Local Government being able to participate and support both State led and collaborative actions. The CRJO would welcome further refinement of the actions

and strategies and a timeframe for delivery based on the priority for delivery on the plans vision and key objectives.

It needs to be acknowledged that the capacity of Local Governments to resource the important work in delivering the plan is significantly constrained by the impacts of rate pegging. The accumulative impact of decades of rate pegging and the increasing of rates at a rate well below inflation, as experienced last year, is having a detrimental impact on our regions, our communities and ultimately the NSW Government through the inability to deliver in a timely manner the planning essential to creating the investment in infrastructure, jobs, and housing that is so essential to the growth of our economy and the wellbeing of our communities.

The NSW Government should utilise the planning levy collected by local Councils on behalf of the NSW Government to provide a funding source to Local Governments to do this critical work. This levy when introduced was used in this manner, however is now used simply to fund the Departments core functions and arguably to undertake work that has questionable benefit to the regions and the NSW planning system. The success of the plan is reliant on its implementation and this will not occur without adequate resourcing for the NSW Government and Local Governments across the region.

There is also an opportunity to provide funding to the CRJO to lead and deliver on the implementation of regional wide actions. There are obvious benefits to this given the CRJOs investment in the region and established relationships with the Local Governments within the region, their communities and the other key stakeholders.

## **6. Population Forecasts Don't Appear to be Realistic.**

The population projections need to be considered in the context of each Council's Local Housing Strategy and the associated population projections.

There are often discrepancies between Local Government and State Government population forecasts. As an example, the current Eurobodalla Shire population forecast for 2022 is 40,129 and is forecast to grow to 45,515 by 2036 (Forecast ID). This is much higher than the projections of 45,402 by 2041 contained within the Plan.

Whereas, Wingecarribee Shire Council has a population projection based on the adopted Local Housing Strategy that is evidence based. 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). Further Wingecarribee 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.

The CRJO encourages the department to include a comparative analysis of its own population forecast with that of Forecast ID, alongside adopted Local Housing Strategies for the individual Councils. It is essential that this issue be addressed in a meaningful way given the reliance by the NSW Government and other investors, on such forecasts for investment decisions.

It is also recommended that other data in the plan be updated to reflect the most recent census data that is now becoming available.

#### **7. Too Much Focus on Current Embedded Strategies and Actions**

The draft plan contains a lot of strategy and actions that are already well embedded in the planning system and process – they focus on work already done or being done as a matter of course. Including this in the draft Plan to the degree that it has been, unnecessarily bulks the plan up making it a more difficult read, clouds the key issues and factors that need to be addressed to drive material change for the better within the Region, and in many instances can lead to confusion within some sectors of the audience.

As an example, Strategies 4.1, 5.1, 6.1, 7.2, and 10.1 are routine considerations in the planning process as it stands or relate to factors that to improve efficiency and certainty should be work undertaken by the NSW Government in collaboration with Local Government and other stakeholders.

As a further example the draft plan should not look to Local Governments to address issues in an ad-hoc manner when there are established regulatory tools better placed to achieve the necessary change in a far more efficient and coordinated manner. As an example, Strategy 7.1 looks to identify and incentivise means to improve building sustainability and resilience. Building design to improve resilience and adaptation can be achieved by looking at “orientation, shading, provision of appropriately sized eaves, light colours, reflective roofing, inclusion of a cool refuge, (and) complimentary landscaping” (Commonwealth 2018, Submission 28). However, none of these ‘solutions’ are formalised in the National Construction Code (NCC) or BASIX, where they should be included. It is very hard for councils to incentivise when the legal framework does not support this.

The draft plan would better serve its purpose by concentrating on those strategies and actions which step outside business as usual and are essential to drive change and position the Region toward achieving its vision and best capitalise on the opportunities that present.

## **8. The Need for a More Proactive and Inclusive Response to Biodiversity and Bushfire Management.**

The CRJO is supportive of the validation of HEV mapping however this should be a function of the NSW Government – not Local Government or ad-hoc process undertaken by Developers. The Government should be undertaking this work with a prioritisation around the urban rural interface and those areas identified for or under pressure of development.

Further, it is recommended that HEV mapping is incorporated into the NSW Biodiversity Values Map. One layer, as opposed to multiple layers, would make it clear and efficient to Council, developers and the community.

The CRJO is supportive of protecting HEV lands however, if HEV land is incorporated into the Biodiversity Values map this would negate the need to also include in LEPs. It would be helpful if the Department made the HEV mapping more accessible to the public via an online GIS viewing tool. (For example, Seed Map).

It is also recommended that the NSW Government undertake in a proactive manner detailed biodiversity assessments of urban release areas, taking into consideration regional biodiversity values, the level of existing protection of vegetation communities in National Parks and NSW Forests. This process should be undertaken to deliver bio-certification of the key urban release areas, overcoming the current ad-hoc process of assessment, the impediments and costs to land supply process and assist in meeting housing supply.

A further recommendation is for a department-led action to align the Planning for bushfire management guidelines and Biodiversity Conservation Act 2016 goals to address the current conflicting objectives. This conflict could also be addressed through integrating the consideration of bushfire management into the recommended biodiversity assessment and certification process for urban release areas discussed above.

Such a strategic and integrated approach by the NSW Government would deliver significant efficiencies and created significant certainty for the community and developers.

## **9. Support of Growth Areas**

There are a number of significant growth areas in the South East and Tablelands region that would benefit from collaboration between State and Local Government. These areas are recognised by the State Government in their strategy of regional development with a potential for population growth, industry and employment opportunities. The two levels of Government need to work collaboratively to support the growth areas.