

Shoalhaven City Council Briefing for the Independent Planning Commission SSD 3846 – West Culburra Concept Proposal

This paper is provided to inform a meeting between Council staff and the Independent Planning Commission. Council has concerns with the state significant development assessment report (the report) prepared for SSD 3846, West Culburra Concept Proposal.

These concerns relate to report's commentary in relation to the strategic planning for Culburra Beach. Council does not intend to provide any commentary on any other technical matters involved in the assessment.

The report fails to recognise Council's long standing five centre growth strategy (that includes Culburra Beach) and consider the Shoalhaven Growth Management Strategy 2014 (GMS) in its consideration of the strategic context of the site.

The GMS is a strategic plan, adopted following robust community consultation, that seeks *to manage the social and economic implications of future growth in Shoalhaven whilst protecting and preserving the environmental values of the City*. It is disappointing that the Department did not discuss or clarify the strategic planning status of Culburra Beach with Council as the relevant local planning authority before finalising its assessment report.

The GMS was endorsed by the NSW Department of Planning on 20 May 2014. It is referenced in the Illawarra-Shoalhaven Regional Plan (ISRP) where it is noted alongside the Illawarra Urban Development Program (IUDP) as forming the strategic planning framework for the region, particularly in relation to the identification of urban investigation areas.

The GMS identifies the land subject to the SSDA as being an *existing urban expansion area* that needed its planning controls reviewed *in light of the Commission of Inquiry and Ministerial Decision on the proposed Long Bow Point subdivision*. The GMS identifies the land as an area for urban expansion within its limited environmental capacity. The failure to consider the GMS leads the report to the erroneous conclusion that the site *is not consistent with areas identified for urban expansion in the current strategic plans* (page v).

The report instead elevates the 2016 update report of the Illawarra Shoalhaven Urban Development Program (the UDP update) and assigns it the role of guiding the location of new urban development (page 20). This is not a valid application of the UDP update. The UDP update is essentially a monitoring tool that is assembled from Council, developer and agency data. It is intended to be informative only and is not intended to direct or determine growth. The GMS is intended to direct growth and as such was subjected to substantial community engagement, unlike the UDP update.

Consequently, Council submits that the following reasons for refusal tabled by the NSW DP&E should not be adopted by the commission:

- (a) (i) *the site ... is inconsistent with strategic planning for urban development across the region*
- (a) (ii) *the site... is incompatible with population growth projections for Culburra Beach*

We look forward to meeting with the commission to discuss these concerns further.



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