An Australian Government Initiative

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RDAIS Submission on The Illawarra Shoalhaven Plan

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About Regional Development Australia (RDA) Illawarra Shoalhaven

RDA Illawarra Shoalhaven (RDAIS) is part of the national RDA network, a federally funded initiative supporting evidence based, locally informed regional development. RDAIS works across the local government areas of Wollongong, Shellharbour, Kiama, the Shoalhaven and the Jervis Bay Territory connecting government, industry and community to provide strategic advice and regional intelligence to inform Commonwealth, state and local decision-making.

Through its role as a connector and convenor, RDAIS supports alignment between regional priorities and national policy, particularly in infrastructure investment, economic transition and regional growth. Being positioned at the interface between federal policy and regional stakeholders across industry, business and community, RDAIS is able to provide directly relevant and data-informed feedback on The Illawarra Shoalhaven Plan.

RDAIS acknowledges that the draft Plan is the fourth iteration of regional planning for the Illawarra Shoalhaven, building on 30 - 40 years of analysis and planning at a regional scale. Many of the Plan's key decisions carry forward findings from earlier work, for example, West Dapto development, which was identified as an urban release area many years ago based on longstanding analysis of landscape impacts and development capacity. RDAIS welcomes the inclusion of the Wingecarribee LGA, given the importance of the relationship and connectivity within and across the region.

Cross-cutting themes

A) Commonwealth alignment and coordination

The Plan is framed around what the NSW Government and Councils will deliver, with implementation sitting with the Minister for Planning and Public Spaces (p.85), and governance built around Department / Council forums (p.85). However, a number of elements reside under Commonwealth jurisdiction, such as:

- Freight rail access to Port Kembla, which is already recognised by Infrastructure Australia as a national priority (p.35)
- Housing targets set under the National Housing Accord (p.22)
- Growth in the defence industry, which is tied to HMAS Albatross, HMAS Creswell and the Jervis Bay Territory (p.28, p.63).

RDAIS response:

RDAIS acknowledges the important investments in the region to date, including the transformative Mount Ousley interchange and the Princes Highway corridor upgrades, which are excellent examples of the Commonwealth supporting and collaborating with the NSW Government on significant projects.

RDAIS would like to see continuing coordination between Commonwealth, state and local agencies to deliver these nationally significant elements of the Plan. There is an opportunity for RDAIS, and state RDAs more broadly, to act as a convenors and facilitators in this space.

B) A workforce and skills strategy to deliver the jobs targets

The Plan sets out an ambitious jobs target of 101,850 additional jobs by 2046 (46% growth), including 78% growth in health and 43% in manufacturing and technology, but not the community services sector (Table 1, p.63). The 10 Responses predominantly refer to land supply, zoning and infrastructure sequencing and do not provide much detail on unemployment (including youth unemployment), workforce development, training pipelines and skilled migration (p.17, 59). RDAIS's State of the Workforce Report, which draws on direct evidence from industry, captures current workforce shortages and outlines their inhibiting effect on economic prosperity. The sectors in this Report match those in the Plan – health, manufacturing, clean energy and more.

RDAIS response:

RDAIS acknowledges the broader ecosystems around workforce attraction, development and retention, including Think Regional, the Welcome Experience, TAFE Centres of Excellence, Commonwealth funding for research commercialisation, RIEP school engagement, and more. RDAIS would support a cohesive and collaborative approach that optimises these ecosystems.

RDAIS recommends development of a workforce and skills strategy to address barriers, target local and youth unemployment, and support delivery of the jobs target (the RDAIS State of the Workforce Report identifies some potential barriers and solutions).

RDAIS stresses the intersection of jobs, housing and transport, and strongly recommends a cohesive, 'systems-thinking' approach, for example, affordable housing for key workers within Transport-Oriented Developments. Transport connectivity to higher education, vocational training and jobs is critical to achieve these targets.

C) Limited coverage of the southern Shoalhaven

The Plan speaks to the regional and state significance of the Shoalhaven supporting 'a mix of rural industry, tourism and strategic defence functions'; however, the Plan appears to overly focus on Nowra with minimal reference to the region south of Nowra, which includes Milton-Ulladulla, Mollymook and many small towns along the A1 east coast corridor. Although investment in the Country Universities Centre and the Princes Highway upgrades have been very welcome and successful, the state significance of the region south of Nowra merits greater focus in terms of ongoing investment and development.

Milton-Ulladulla is referenced mainly as a tourism and marine destination, and it's shown as a minor activity centre on the Plan's maps with less detail around housing, jobs and infrastructure needs than Wollongong, Shellharbour or Nowra. However, the southern Shoalhaven region is experiencing growth and diversity in sectors such as health, aged care, hospitality, retail, entrepreneurship, construction, wine production, agriculture, and professional services. This part of the region does a lot of 'heavy lifting' in terms of services and infrastructure supporting surrounding communities and visitors, and it has significant potential for economic growth being on the 'grey nomad' east coast to Victoria and ACT routes.

RDAIS response:

RDAIS recommends additional detail on the importance of the southern Shoalhaven, the need to provide infrastructure that supports education, jobs and opportunities for economic diversification.

RDAIS recommends extending the priorities of prosperous, connected and liveable to have greater focus on the southern Shoalhaven, including precinct-style redevelopment and investment in the commercial heart of the Milton-Ulladulla activity centre aligned with the Ulladulla Harbour Master Plan and Local

Aboriginal Land Council initiatives. RDAIS welcomes measures that support the region's potential for growth, such as support for delivering quality commercial and industrial infrastructure, and measures that incentivise businesses to grow.

D) Housing

RDAIS strongly supports provision of housing, particularly affordable housing, which is essential to house students, key workers and the wider workforce needed to achieve the jobs targets outlined in the Plan, and economic growth. RDAIS supports the intent of medium-density housing targets in priority areas to accelerate cost-efficient housing delivery, and the focus on Transport Oriented Development (TOD) to build homes close to transport infrastructure.

The Plan acknowledges an estimated 3,500 dwellings in Shoalhaven operate as short-term rentals (p.25) and that the visitor economy's accommodation constraints limit capacity in peak periods (p.42), but the related response (Action 10.5, 'identify policy interventions') lacks detail and is ear-marked for 2028 – 2030, which we believe is too late.

The Plan contains good data on a range of metrics, including demographic information, the proportion of renters in rental stress, and the volume of affordable housing stock, but it doesn't contain any reference to homelessness or demand for affordable housing across locations.

The Plan cites five important actions under Response 2 (Prioritise housing diversity and choice to meet changing household needs) and two housing-related actions under Response 10 (Connect and grow the network of regional public open space and events infrastructure), but we feel these are too high-level, not specific enough, and not sequenced as soon as they should be.

RDAIS response:

Given that 37 - 42% of renters across the region's LGAs are already in rental stress (p.19), RDAIS would strongly support action 10.5 being brought forward as a near-term priority due to the importance of the visitor economy and the need for both Short-Term Rental Accommodation (STRA) as well as affordable housing. The region relies on visitors and STRA to sustain local jobs and businesses, therefore RDAIS supports housing supply solutions, such as in-fill affordable housing, that don't disadvantage visitors and harm the local economy.

RDAIS also supports actions 2.3 (social housing renewal) and 2.4 (an affordable housing contributions scheme) being brought forward with the inclusion of specific targets and commitments.

RDAIS urges the Government to strengthen the Plan by addressing homelessness as a core priority, publishing clear regional housing needs with supporting waitlist data and committing to measurable targets and accelerated delivery timelines for new social and affordable housing.

The Plan articulates clear and strong actions to respond to the housing priority (p.55), and RDAIS would strongly encourage inclusion of aged care in these actions. RDAIS is currently collaborating with key stakeholders to drive advocacy for aged care facilities and services. This is particularly important considering the current aged care shortage, which will be compounded in future years due to our ageing population (The Weekly Source).

E) Protection of rural and agricultural land against urban growth pressure

The Plan commits to protecting Biophysical Strategic Agricultural Land and the region's $491 million agricultural economy (p.30), but it doesn't articulate how this will be managed with greenfield growth areas expanding at West Dapto, Nowra - Bomaderry, West Kiama and South Bowral.

RDAIS response:

RDAIS would welcome more detail on how this tension will be managed, particularly given the region's growing agritourism sector and the rural-urban interface tension mentioned on p.30.

F) Supporting economic growth in our region(s)

RDAIS supports the NSW Government's vision for a connected, productive economic zone to Sydney's south-west, and agrees with the identified infrastructure and planning proposals to support the movement of workers and freight. RDAIS also views the future growth of the aerotropolis at Western Sydney Airport as essential to supporting long term jobs for residents of our region.

This is an ambitious plan for the Illawarra Shoalhaven (and Wingecarribee) region which, if implemented, opens opportunity for economic growth and social wellbeing for our populations.

RDAIS response:

RDAIS's recent Regional Transport Connectivity Report highlights the need for sustained focus on, and investment in, transport priorities, particularly rail infrastructure maintenance to reduce disruptions, Picton Road upgrades, Mount Ousley and M1 Princes Highway upgrades, improvements to major 'pinch points' into, and out of, Port Kembla (Masters Road, Springhill Road and Five Islands Road intersections), redundancy options for major routes, and, implementation of the Maldon-Dombarton rail link. Given the region's growing importance in the supply chains for Sydney, Western Sydney, NSW and the nation more broadly, these transport connections are of critical importance for economic growth – state-wide and nationally.

Given that many of the responses outlined in the Plan will require substantial procurement of goods and services, for example project management and construction, RDAIS would welcome changes to state and local government procurement policy that increase sourcing of products and services from within the region. Policy could also include greater weighting for broader regional benefit, e.g. local delivery of white card training. The Transport for NSW social procurement approach to the Albion Park Rail bypass, which delivered a pre-employment program and jobs for local people, is a good case study. The $190M Bewong to Milton Water Main Upgrade is an example of a project where clever application of procurement policy could drive significant, long-lasting benefits for the region.

RDAIS acts as a certifying body for the Skilled Employer Sponsored Regional (SESR) Visa program. The cost and complexity of this program has been raised by SMEs in the region, and this issue is worsening, as evidenced by the number of inquiries fielded by RDAIS on a monthly basis.

*RDAIS's work to develop the State of the Workforce Report highlighted failures in matching skilled migrants who are already living in the region with in-demand skills. Many of these workers are under-employed or working outside their field. Our conversations with the Welcome Experience team demonstrate that we are good at attracting skilled workers to the region, but not as good at placing them in their field. This is a worsening multi-agency problem and a barrier to the proposed jobs growth and economic prosperity outlined in the Plan (Response 7.) At the prompting of the Federal Member for Cunningham, the Hon. Alison Byrnes MP, who is concerned about these issues in our region, RDAIS, in collaboration with Business Illawarra, recently proposed a pilot **Regional Skills Utilisation and Retention Program**, which would be a worthwhile initiative to pursue in a coordinated approach with Commonwealth government to optimise the workforce/migration nexus.*

Feedback by priority area and response

G) Strategic drivers (p. 7)

RDAIS acknowledges the significant and impactful work already undertaken by the NSW Government, for example, establishment of the Housing Delivery Authority, Development Coordination Authority and Targeted Assessment Pathway, which will streamline processes and promote cohesion and coordination across portfolios. RDAIS also supports the NSW Government's focus on Transport Oriented Development (TOD) to increase housing around critical infrastructure, noting the need for strong public domain outcomes in these precincts, supported by local government.

While these initiatives are a significant step forward, RDAIS advocates for continued momentum and further measures from the NSW Government to overcome hurdles, address 'pain points' and accelerate provision of diverse housing types. Housing supply and affordability remain the top issues that need urgent and radical resolution. RDAIS views housing supply, particularly affordable housing for students, key workers, the broader workforce and our ageing population, as a critical foundation for economic growth.

RDAIS response:

RDAIS would support additional measures to improve cohesion and streamline processes between government departments and local councils to optimise housing development outcomes, improve sequencing and minimise lag between development and supporting infrastructure such as schools, public transport and health services.

RDAIS supports initiatives that expedite efficient application of sensible policy, streamline processes and reduce 'lodgement to keys' timeframes, for example, the NSW Housing Pattern Book and similar innovations. Supply of affordable housing for students, key workers, the broader workforce and ageing communities is a critical priority that requires urgent and radical solutions.

H) Introduction (p. 12 – 19)

The cross-regional commuting patterns (p.18) are a significant differentiator for the region, and RDAIS welcomes the acknowledgement of inter-regional relationships - an important factor when considering access to housing, employment and education, as well as supply chains that underpin development in the Macarthur area and South West Sydney, plus broader state and national economic growth.

RDAIS response:

RDAIS would like to stress the importance of inter and intra-regional transport connectivity and would welcome budget commitments for continued investment in key corridors such as Picton Road, M1/Mount Ousley and the shared rail network, complementing the newly released Strategic Regional Integrated Transport Plan (SRITP), which is key to enabling the desired outcomes of this regional Plan. The region's strategic and operational importance relative to supply chain logistics and freight movements in and out of Port Kembla, the intermodal terminal at Moorebank and the Western Sydney International Airport, coupled with closure of the working port at Glebe Island, cannot be understated.

RDAIS welcomes protection of key corridors and supports far-horizon forward planning to identify and preserve future corridors, for example, the Maldon-Dombarton corridor and connection to the Outer Sydney Orbital. More feedback on the subject of transport connectivity is provided later in this submission.

I) Priority 1: Aboriginal outcomes

Response 8: Define appropriate land use pathways to support Aboriginal outcomes (p. 20 – 21, 73 – 75)

As noted in the Plan, the region holds particular significance for people, family groups and language groups across the Dharawal, Gundungurra and Yuin nations, including the Wodi Wodi, Jerringa, Wandi Wandandian, Dhurga and Murramarang peoples. This region spans Land and Sea Country and holds particular significance for Saltwater People – Kutangal. The rivers, sea country, bays and creeks of this region have profound cultural and spiritual significance.

RDAIS welcomes and supports:

- Strong emphasis on embedding Aboriginal knowledge, Country and culture in planning (p.20).
- Articulation of both Native Title and Aboriginal Land Rights Act pathways, and commitment to resolving administrative barriers to land use (p.21).

- Land use pathways tied to environmental, economic and social/cultural purposes as defined by LALCs, rather than imposed (p.73).

While these measures recognise Aboriginal peoples' prior occupation and care of this land, they do not deliver housing security, economic independence or intergenerational opportunity. As currently framed, the Plan's Aboriginal housing benefits flow primarily through Land Councils and Native Title holders, with no clear pathway for individual Aboriginal people - particularly young people - to enter the housing market. As outlined previously, RDAIS views housing supply, particularly affordable housing for students, key workers, the broader workforce and our ageing population, as a critical foundation for economic growth.

RDAIS response:

RDAIS would like to see consideration of the following measures:

- *Dedicated Aboriginal first-homebuyer assistance*
- *Low-deposit loans, grants and culturally safe financial guidance*
- *Deposit protections during new housing developments*
- *Affordable housing allocations within developments built on Aboriginal lands*
- *Shared-equity and rent-to-buy pathways co-designed with Aboriginal people and communities*

These measures have potential to deliver tangible, lasting impact by enabling young Aboriginal people to secure homes, build equity, and build a future on their own Country.

RDAIS acknowledges the state-wide backlog of unresolved land claims (~44,000 across NSW, NSWALC Sept' 2026) and would welcome firmer commitments and milestones under Response 8 (currently framed around 'explore' and 'work with' for 2026–2030) to resolve outstanding issues and provide greater certainty around land status and use. Given the region's bushfire and flood risk, and reports of Crown land being returned without land management support, RDAIS would welcome further detail on change management, transition planning and funding - particularly given Yuin Country's active cultural-burning practice post-Black Summer. This is especially relevant to the Booderee National Park transition to the Wreck Bay Aboriginal Community Council in May 2028, for which RDAIS would welcome a repeatable transition framework.

Finally, RDAIS would welcome more detail on how outcomes under the Plan will be measured.

J) Priority: Housed

Response 1: Increase housing supply in the Urban Growth Area

Response 2: Prioritise housing diversity and choice to meet changing needs

Response 3: Align sequenced infrastructure delivery with growth priorities

(P. 22 - 25, 50 – 55)

RDAIS welcomes the following:

- A clear housing pipeline with over 86,000 homes already in planning and a target of 80% of new homes within the existing urban area (p.50).
- Explicit recognition of affordability pressure and a commitment to a regional affordable housing contributions scheme (p.54).
- A focus on Transport Oriented Development (TOD) to optimise existing infrastructure.
- Named case studies (Bellambi Estate renewal, Bomaderry Build to Rent) that demonstrate the approach is already being tested (pp.52, 55).
- Clear and strong actions (p.52) to support prioritisation and accelerated development, particularly in relation to local planning controls.

RDAIS response:

RDAIS notes that housing for temporary and seasonal workforces is acknowledged as an issue (p.25) and would welcome more information regarding a roadmap to address this particular issue. This is a priority for our region due to the importance of the visitor economy and the need for Short-Term Rental Accommodation (STRA) as well as affordable housing. The region relies heavily on visitors and STRA to sustain local jobs and businesses, therefore RDAIS supports policy interventions and housing supply solutions, such as in-fill affordable housing, that don't disadvantage visitors and harm the local economy.

The State of the Workforce Report produced by RDAIS in 2025, outlines the region's longer development processing averages (101 days in the region vs 84 days in the Lower Hunter), which is partly attributed to a shortage of planners. Given the delivery model outlined in the Plan (UDP, ELDP, IOP, local planning) depends on Council and DHPI planning capacity, we feel this is a risk that needs to be mitigated to ensure achievement of intended outcomes.

RDAIS supports targeted, accelerated investment in innovative solutions, such as adoption of agentic AI for automation of appropriate tasks. Some aspects of the development assessment process are highly suitable for automated triage, which would significantly reduce processing times.

State-level policy improvements and process efficiencies around planning and development can be difficult to realise at the local government level due to the plethora of policies requiring consideration, for example, flood zone, bush fire, car parking, height restrictions and more. RDAIS would welcome state-wide initiatives that support Councils to expedite sensible policy and process requirements more efficiently, including automation and triage of appropriate tasks, thereby accelerating delivery of these important housing supply outcomes.

The Plan articulates clear and strong actions to respond to the housing priority (p.55), and RDAIS strongly recommends the inclusion of aged care in these actions. RDAIS is currently collaborating with key stakeholders to drive advocacy for aged care facilities and services. The shortage of aged care beds is a critical issue in our region, and this will be compounded in the future due to the ageing population.

The regional affordable housing contributions scheme (Action 2.4) is ear-marked for 2028 – 2030 despite the social housing waitlist being described as 'significant' (p.25) and rental stress already at 37 - 42% across the region (p.19). RDAIS recommends this action be accelerated.

K) Priority: Prosperous

Response 4: Support a vibrant centres network

Response 5: Intensify and grow the region's industrial lands

Response 6: Deliver Australia's first Urban Renewable Energy Zone

(P. 26 - 31, 58 - 65)

RDAIS supports:

- Substantial industrial land pipeline (4,500 hectares, with a 20 ha/year development-ready supply target) and clear jobs targets by industry (Table 1, p.63).
- Recognition of the Port Kembla / BlueScope land transformation as an important catalyst for advanced manufacturing and clean energy jobs (p.29).
- Sensible protection of rural and agricultural industry alongside urban growth (p.30).

The Illawarra Urban Renewable Energy Zone (REZ) is included in the Plan (Response 6, pp.66 - 69), and RDAIS acknowledges that infrastructure requirements for the REZ are in the design stage and are evolving.

RDAIS response:

Coal mine closures are flagged with 'opportunities to re-purpose sites' (p.64); however, the Plan doesn't include information regarding a transition timeline and transition support for the workforce. RDAIS would welcome more detail, even at a high level, on regional economic transition.

Data centre growth is flagged as an emerging land use with 'infrastructure-heavy, resource-intensive' needs (p.64), but the Plan also flags water security as an increasing constraint (p.46). RDAIS would welcome more information around how these competing demands might be considered/resolved before land is committed.

RDAIS notes the omission of the Innovation Campus (iC), which is a significant entity bridging education and research with commercialisation, entrepreneurship and industry – highly relevant to population and jobs growth in the region. Further, there is potential for the iC to have greater strategic purpose as a precinct for wider public utilisation aligned with Government priorities. For example, if the University of Wollongong were to (re)develop student housing, there would be potential for key worker housing alongside innovation and entrepreneurship capabilities, and other opportunities to advance Government priorities.

The recent RDAIS Regional Transport Connectivity Report highlighted the importance of a cohesive, coordinated and sequenced approach to land activation and development of supporting infrastructure. Whilst applauding the significant investment and work already achieved, RDAIS would like to stress the importance of upgrading and improving existing transport networks to support vibrant centres, social wellbeing and economic growth. This includes addressing pinch points such as intersections on Masters Road, Springhill Road, Five Islands Road and Picton Road. The Report also highlighted the pressing need for redundancy options for Mt Ousley, with many stakeholders fearing a Great Western Highway, Mt Victoria scenario, which would have dire consequences for the whole region. This is a high priority for our region, but also the state more broadly given the critical importance of these corridors for state-significant supply chain logistics.

The Plan references the potential for new freight infrastructure at Maldon – Dombarton to support a 'network of highly productive industries.' As highlighted in our Regional Transport Connectivity Report, this is viewed as critical infrastructure for the region and the broader state. The Maldon -Dombarton line would play an important role in supporting mode shift and mitigating traffic volume growth along key road corridors, and around Port Kembla. RDAIS believes this is a high strategic priority for the region and the state.

RDAIS supports the clear and strong actions for Response 4 (p.61) supporting a 'vibrant centres network, anchored by Wollongong as the region's principal CBD,' and would welcome engagement with LALCs, peak bodies and other key stakeholders when implementing these actions.

RDAIS supports greater focus and investment in activity centres in the southern Shoalhaven, primarily Milton, Ulladulla and Mollymook. These activity centres do a lot of 'heavy lifting' in terms of services and infrastructure for surrounding communities and visitors, but communities south of Nowra are significantly disadvantaged by lack of public transport and access to opportunities. RDAIS supports pro-employment initiatives for small to medium-sized enterprises to attract and retain skilled workers, and, planning initiatives that open more land in for industrial and commercial uses. Investment in these centres is warranted to service communities and visitors south of Nowra.

With regard to Action 4.4 (p.61), which relates to LGA jobs targets, RDAIS's State of the Workforce Report identifies barriers that could impact achievement of these targets. We would therefore welcome a coordinated approach to mitigation of these barriers.

L) Priority: Connected

Response 7: Unlock the productivity, economic and lifestyle benefits between the region and South West Sydney

(P. 32 - 35, 70 - 72)

RDAIS supports the important recognition of Port Kembla freight rail access as an Infrastructure Australia national priority (p.35), and the strong framing of the strategic relationship with South West Sydney, Western Sydney Airport and inter-modal freight terminals at Moorebank, which are significant economic opportunities, not only a commuting corridor (p.70).

The Plan articulates the national significance of networks that provide a 'foundation for global markets accessed via Port Kembla and Western Sydney Aerotropolis', which cannot be understated as critical for state and national prosperity. Coupled with the recently released Sydney Plan and the planned closure of the Glebe Island port, which has ramifications for cement importation and processing, the criticality of the inter and intra-regional road and rail connections for supply chain logistics and construction state-wide, cannot be understated.

These elements of the Plan align with RDAIS's findings and priorities outlined in our Regional Transport Connectivity Report and also align with the recently released Strategic Regional Integrated Transport Plan.

RDAIS response:

The Plan recognises the vulnerabilities and challenges of the escarpment crossings (Bulli Pass, Mount Ousley Road, Moss Vale Road and the Illawarra Highway plus the South Coast Rail Line and the Unanderra – Moss Vale freight line) as 'increasingly vulnerable to disruptions' (p.34) but the actions under Response 7 refer to strategy and planning documents rather than funded upgrade commitments. RDAIS would welcome clearer prioritisation and significant funding commitments, in collaboration with Transport for NSW.

Whilst applauding the significant investment and work already achieved, RDAIS would like to stress the importance of inter and intra-regional transport connectivity and would welcome clearer commitments around continued investment in key corridors such as Picton Road, M1/Mount Ousley and the shared rail network, complementing the newly released Strategic Regional Integrated Transport Plan (SRITP), which is key to enabling the desired outcomes of this Plan. This includes addressing pinch points such as intersections on Masters Road, Springhill Road, Five Islands Road and Picton Road, as well as redundancy options for Mt Ousley. Many regional stakeholders fear a Great Western Highway, Mt Victoria scenario, which would have dire consequences for our region and beyond, given the critical importance of these corridors for state-significant supply chain logistics. These are critical corridors supporting economic growth and performance for the state and the nation.

RDAIS's recent work on the Regional Transport Connectivity Report highlighted the need to identify and protect current and potential future transport corridors, for example, the Maldon – Dombarton rail link and potential corridor(s) enabling future connection to the Outer Sydney Orbital. Noting the tension between population and housing growth, RDAIS would welcome a 'far horizon' future-focused approach to identifying and preserving corridors that might be required in the longer term.

Public transport accounts for only 4.6% of trips regionally. 79% of trips are car dependent in the Shoalhaven (p.34). RDAIS would welcome greater support for mode shift to public and active transport and more detail on how this might be incentivised and facilitated.

The Plan discusses rail/bus reliability for the Nowra - Bomaderry cluster and general public transport rollout but doesn't mention this in terms of access to training. RDAIS's State of the Workforce (SOTW) Report outlines the significant impact that lack of public transport is having on TAFE/VET and university access and participation. This is particularly relevant for access to TAFE and Country University Centre

campuses in Ulladulla, the Bay and Basin, and Bomaderry areas, and is a significant barrier to apprenticeships and skills uptake. Given the importance of connectivity, jobs growth and economic prosperity, RDAIS would welcome greater consideration of access to training and education in transport sequencing.

The SOTW Report also highlights childcare 'deserts' as barriers to workforce participation and would welcome inclusion of measures to address this issue, particularly commitment to include childcare infrastructure in future developments.

M) Priority: Resilient

Response 9: Protect the region's natural places so both people and nature can thrive as the climate changes

(P. 36 - 41, 76 - 77)

RDAIS appreciates the recognition of flood, bushfire and coastal hazard exposure, with the Lower Shoalhaven River catchment named as the highest flood-risk catchment in the region (p.38).

RDAIS supports the sensible principle of prioritising investment in connected biodiversity corridors over disconnected patches (p.36).

RDAIS response:

The Illawarra Biodiversity Strategy dates from 2011 and is being updated to include Shoalhaven and Wingecarribee (p.76). The evidence base from this 15-year-old plan might need to be revisited.

The Plan defers updating the Urban Growth Area for flood/hazard risk until a separate, still-to-be-completed Disaster Adaptation Plan process concludes (p.76). There is risk exposure if that process is delayed.

N) Priority: Liveable

Response 10: Connect and grow the network of regional public open space and event infrastructure

(P. 42 – 43, 78 – 81)

RDAIS supports the Blue-Green Grid concept, which connects parks, cultural venues and shaded streets within one accessible network. This is a good approach (p.80).

RDAIS also supports the development of Warrawong Parklands and Nowra Riverfront – areas of great potential for revitalisation that enables communities and visitors to connect with nature, culture and recreation. We support this in the context of broader precinct development where housing is complemented with lifestyle infrastructure such as retail, commercial, education and health services – all achievable for the Nowra Riverfront development.

RDAIS also supports the recognition of the region's growing cultural and linguistic diversity, and the role of community organisations in supporting it (p.42).

RDAIS response:

Accommodation capacity constraints for the visitor economy (10 - 12 million visitors per year, limited accommodation in peak periods, p.42) are identified but the policy response (Action 10.5) lacks detail and is ear-marked for 2028 -2030. As outlined previously, the importance of the visitor economy for jobs, businesses and future growth cannot be over-stated. RDAIS would welcome policy interventions that increase housing supply without negatively impacting valued visitors to our region and local businesses, for example, easing of planning controls to accelerate delivery of hotel accommodation in key areas and

affordable housing for key workers. There is a need for increased supply of affordable housing for students, key workers, the broader workforce and our ageing population, but the economy of this region also relies on Short-Term Rental Accommodation (STRA).

RDAIS welcomes housing development supported by broader precinct development, where housing is complemented with lifestyle infrastructure such as retail, commercial, education and health services.

O) Priority: Coordinated

Response 3: Align sequenced infrastructure delivery with growth priorities

(P. 44 – 46, 82 – 86)

RDAIS commends extension of the Urban Development Program to cover Wingecarribee LGA (p.83).

The Infrastructure Opportunities Plan and Urban Development Program together provide a sensible mechanism for sequencing housing against infrastructure delivery (p.83).

RDAIS response:

Governance (p.85) is described in terms of Department / council forums, including planning liaison meetings, the Regional Leadership Executive, and bi-annual council forums, with no mention of regional bodies, industry or community representatives in monitoring implementation. RDAIS (or an equivalent regional voice) would be a valuable addition to this process given our cross-LGA remit.