

14 September 2012

New Planning System Team
Department of Planning and Infrastructure
GPO Box 39
Sydney NSW 2000

Dear Sir/Madam

Thank you for providing the opportunity to put forward our comments relating to *A New Planning System for NSW Green Paper (July, 2012)*. Regional Development Australia (RDA) Illawarra makes the following comments in its role as the peak regional development agency for the region encompassing Wollongong, Shellharbour and Kiama Local Government Areas.

Blueprint (pp 4-7)

- Community Participation is a welcome and necessary operating principle that should allow clarity of purpose and transparency.
- Strategic Focus replaces perception of partisan advantage and affirms a correlation between regional plans and infrastructure rollout. Sub-regional delivery plans suggest an obvious role for Regional Development Australia (RDA) committees to engage stakeholders in concert with local government authorities.
- Streamlined Approval allows depoliticised decision making to comply with timeframes for development. While “extended reviews and appeals” provides opportunities to democratise the planning process, caution must be exercised to not retard the rollout process by objections from sectional interests (hopefully screened during the framing of regional and subregional plans). We would strongly urge that the approval decisions include consideration of social benefit or social return on investment and thereby promote social procurement practices in tendering.
- Provision of Infrastructure confirms the links between planning and infrastructure (point 17). The definition of what constitutes “Public Priority Infrastructure” must include an assessment of community benefit or impact rather than simply an investment threshold. The coupling of planning and infrastructure should ensure the predictability and appropriate sequencing of infrastructure projects sought by regions.
- Delivery Culture is concerned with governance and management and there is clearly a role for RDA committees to participate on Regional Planning Boards.
- Community Participation enables progressive accountability through plain English updates to communities affected. Staged opportunities for community input should be made clear in plans. There is an implicit opportunity to promote the current and forecast contribution of a given region to the NSW economy.

- Strategic Planning should integrate employment lands in regional plans and facilitate Transport Oriented Developments.
- Infrastructure Delivery. There is a sense in which all infrastructure is “Public Priority Infrastructure” unless there is an attempt to differentiate “publics” that identify sectoral interests that may conflict with broader community amenity interests. Presumably the public can influence sequencing?

Chapter 5 Strategic Planning

- Regional Growth Plans should recognise at least two distinct types of infrastructure (there needs to be a mix of both pursued concurrently):
 1. Quantum enhancements to current infrastructure to make it work more productively and create a greater public benefit (eg. employment or better transport access and trip times).
 2. New “greenfield” innovative developments (eg. high speed rail, location of new airport).
- NSW Government Proposed Reforms (p34-5). RDAI welcomes the statement: “NSW Government will strengthen strategic planning efforts to facilitate growth in regional and rural NSW. Regional Growth Plans for these regions will be a priority in the roll out of the new planning system”:
 - It is assumed that the engagement process employed will ensure that the direction in which the NSW Government “expects a region to grow over a 20 year period” aligns with articulated community expectations. Regional Growth Plans should reflect aspirations for industry diversification (in particular green technology), employment opportunities, public amenity and environmental enhancement.

Change 7 Subregional Delivery Plans

RDAI particularly welcomes the emphasis on Subregional Delivery Plans and the opportunities for regional communities to determine their preferred future in a way that offers predictability. Again, the construction and realisation of such plans will be assisted by the existing facilitation role of RDA committees in achieving consensus.

Enterprise Zones (p45)

RDA Illawarra welcomes the intention to create the new land use class of Enterprise Zone and believes the Illawarra region would benefit greatly from this approach as industry diversification and employment opportunities are its twin imperatives. The one caveat would be that engagement and consultation offers sufficient insurance against adverse environmental and other impacts. Investment attraction is vital to the regeneration of enterprise development in the Illawarra following the significant downsizing of a major employer in BlueScope Steel. Precincts might include clean energy businesses and social enterprises.

Regional Infrastructure Identified in Growth Infrastructure Plan (p76)

Items referred to here are pertinent to the Illawarra, particularly the road network and a designated health precinct.

Regional Planning Boards (Change 21, p86)

There is a clear role for RDA committees to be represented on such Boards and contribute to whole of government synergies.

Planning Culture (Change 23, p88)

In making the business case for infrastructure projects according to economic modelling, measures of social benefit should be included and every effort made to promote social procurement principles and practice.

Again, thank you for the opportunity to provide input to *A New Planning System for NSW Green Paper (July, 2012)*. RDA Illawarra would welcome the opportunity to further discuss our comments if necessary.

Yours sincerely

Natalie

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