



25 February 2020

The General Manager
Shellharbour City Council
Locked Bag 155
Shellharbour City Centre NSW 2529

Via email: council@shellharbour.nsw.gov.au

Dear Carey,

Draft Shellharbour Open Space and Recreation Needs Study and Strategy

The Urban Development Institute of Australia (UDIA) NSW is the leading industry body representing the interests of the urban development sector and has over 500 member companies in NSW. Our membership includes major landowners and developers in Calderwood, Tullimbar, Shell Cove and Shell Heights. UDIA NSW advocates for better planning, timely and affordable housing, and the building of vibrant communities to increase local job opportunities.

We would like to thank Council for the opportunity to comment on the open space and recreation needs of the Shellharbour community. Council is to be commended for proactively and transparently planning for open space needs, and engaging highly experienced consultants to prepare the Strategy.

UDIA is generally supportive of the findings within the Study that Shellharbour residents have access to a wide variety of open space and recreation facilities. Our industry supports and funds the provision of some of this infrastructure, and it provides value to homebuyers and investors. We provide the following comments on the Study and Strategy.

Density forecast

One of the main areas of the UDIA's advocacy in Shellharbour is to encourage Council and the community to embrace medium density housing near local centres and higher density development in major centres. We believe this will foster distinct identities for these centres and encourage street activation and walkability.

The UDIA's market analysis via our quarterly Residential Developer Market Intelligence report indicates there is significant unmet demand for medium- and high-density product in the Shellharbour LGA. UDIA raised this in our submission to the draft Shellharbour Local Housing Strategy in 2019.

We acknowledge the predictions in the Study of a shift to greater medium density take-up but believe this shift will be larger than predicted in the Study, and will also include a similar shift to high density in areas of high amenity. Direction 1 of the Strategy needs to be clearly aligned to the optimal density outcomes achievable under the Shellharbour Local Environmental Plan.

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Urban open space needs

Given this anticipated intensification of higher density in local and major centres, UDIA recommends that the Strategy identify more opportunities for urban space and recreation facilities, associated directly with higher density areas of the LGA. In most cases this will mean smaller but more robust open space areas suitable for higher user volumes.

The delivery of these spaces at the same time as the completion of higher density development would help to address community concerns about increasing densities.

Review schedule

The 2020s will be a critical decade for the Shellharbour LGA as several major new communities progress or complete – Calderwood, Tullimbar, Shell Cove and Shell Heights. We also expect infill development to increase in line with significant demand for medium density product.

UDIA therefore recommends that Council commit to reviewing the Strategy every two years to ensure it aligns with the latest level of demand for open space and recreation in the LGA.

Marina Recreation Opportunities

Direction 3 notes the community's strong ties to water and beaches, but does not appear to harness the potential opportunities for recreation associated with the new Shell Harbour Marina which Council will take ownership of next year. This is a significant missed opportunity in the draft strategy. The Strategy should proactively plan for Shellharbour's future positioning in the marine industry, giving itself the ability to maximise both economic and recreational advantages.

Contributions Plan and Maintenance Costs

UDIA notes Action 2.11 of the Strategy is to "ensure all Council planning instruments - including the ... Contributions Plan - accurately reflect the full cost of required maintenance works and upgrades". UDIA notes that any amendments to open space provisions in the Contributions Plan will need to demonstrate nexus and apportionment based on the demand generated by new development. The service catchment for open space and recreation facilities is usually wider and more difficult to define than other local infrastructure.

UDIA also notes that many local councils are considering how to manage the maintenance cost of lands dedicated to them during the development process. While we support a reasonable maintenance funding period by the developer, we would expect Council to engage directly with the industry on this issue before making a policy decision.

Thank you again for the opportunity to comment on the draft Study and Strategy. I would be pleased to discuss this further with you and can be contacted on 0435 243 182 or kthomas@udiansw.com.au.

Yours sincerely,



Keiran Thomas
Southern Regional Manager