



Planning Proposal

Warra Warra Road South Nowra
Reference: Lysand Pty Ltd & Lyrock Pty Ltd
23 March 2026
Amended September 2026



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Executive summary

This Planning Proposal seeks to amend the Shoalhaven Local Environmental Plan 2014 (LEP 2014) as it applies to land at Warra Warra Road and Old Southern Road, South Nowra, being Lot 2 DP 1126288 and Lot 224 DP 755952. The proposal seeks to rezone part of the existing E3 Productivity Support land to R1 General Residential and C2 Environmental Conservation and amend the minimum lot size provisions applying to the residential land.

The proposal has been prepared in response to the growing demand for housing within the Shoalhaven and seeks to facilitate the delivery of approximately 202 additional dwellings within the Nowra-Bomaderry growth area. The proposal will contribute to housing supply and housing diversity in a location that is well connected to employment opportunities, community facilities, services, educational establishments and the Nowra City Centre. The proposal is consistent with the objectives of State, Regional and Local strategic planning documents that seek to increase housing supply and improve housing affordability outcomes.

The Planning Proposal has evolved following the earlier scoping process and consultation with Shoalhaven City Council and relevant government agencies. In response to issues identified during the scoping phase, the originally proposed MU1 Mixed Use zoning has been removed and the proposal redesigned to focus on residential development and environmental conservation outcomes. The revised proposal incorporates a substantially larger environmental conservation area associated with Browns Creek and adjoining biodiversity values and retains approximately 6.7 hectares of E3 Productivity Support land fronting the Princes Highway.

A comprehensive suite of technical investigations has been undertaken to inform the proposal, including assessments relating to biodiversity, Aboriginal cultural heritage, flooding, bushfire, traffic, infrastructure servicing, contamination, water quality, economic impacts, rifle range operations and environmental noise. These investigations demonstrate that the site is suitable for the residential zone proposed



for it, and that identified constraints can be appropriately managed through the proposed zoning framework and future development application processes.

The proposal achieves an appropriate balance between housing delivery and environmental conservation. Approximately 9.3 hectares of environmentally sensitive land associated with Browns Creek and identified biodiversity values are proposed to be protected through environmental conservation zoning. The proposal also retains employment land to the Princes Highway frontage whilst establishing a conservation corridor that provides separation between future residential development and retained employment uses.

Having regard to the strategic planning framework, the demonstrated need for additional housing, the findings of the supporting technical investigations and the environmental outcomes achieved by the revised proposal, it is concluded that the Planning Proposal exhibits both strategic merit and site-specific merit. Accordingly, it is considered appropriate that the proposal proceed to Gateway determination and public exhibition.



1 Introduction

The proponent for this proposal is Jervis Bay Town Planning who are acting on behalf of the owners of the land, Lysand Pty Ltd and Lyrock Pty Ltd.

The planning proposal seeks to amend the Shoalhaven Local Environmental Plan 2014 (LEP 2014) to enable residential development on land in South Nowra. The amendments include rezoning part of the existing E3 Employment Support zoned property to part R1 General Residential and part C2 Conservation. Amendments to the minimum lot size controls on the rezoned residential land are also required to facilitate appropriate development outcomes.

This report has been prepared to address the requirements of Section 3.33 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), as well as satisfying the requirements of the NSW Department of Planning and Environment (DPE) *Local Environmental Plan Making Guideline* (August 2023).

This report demonstrates that the proposed amendments to the LEP 2014 are consistent with the intent and objectives of the planning framework and strategic plans and policies.

Evolution of the Planning Proposal Following Scoping Consultation

The current Planning Proposal differs from the concept initially presented through the scoping process.

The scoping proposal lodged in March 2025 sought to rezone the site to a combination of MU1 Mixed Use, R1 General Residential, C2 Environmental Conservation and retained E3 Productivity Support land. The proposal contemplated a mixed-use precinct incorporating retail, commercial and residential development in the south-eastern portion of the site, together with residential development to the north-east and environmental conservation land associated with Browns Creek and adjoining vegetation corridors.

Following referral of the scoping proposal to Council, State agencies and infrastructure providers, and subsequent discussions with Council officers, a number



of matters were identified requiring further consideration. In particular, concerns were raised regarding the appropriateness of introducing a mixed-use zone in proximity to the Nowra Rifle Range and adjoining employment lands, and whether the proposed zoning pattern would inadvertently increase the number of sensitive residential receivers exposed to potential land use conflict.

Council's feedback noted that the proposed MU1 zoning could facilitate higher density residential development closer to both the rifle range and existing employment lands and may not achieve the intended buffering outcome identified in the scoping proposal.

In response to this feedback, extensive additional investigations were undertaken, including detailed assessments relating to flooding, biodiversity, traffic, bushfire, infrastructure servicing, Aboriginal cultural heritage, economics and noise.

As a consequence of the scoping process and consultation with Council officers, the Planning Proposal has been revised.

Key changes include:

- Removal of the proposed MU1 Mixed Use zone in its entirety.
- Expansion of the proposed environmental conservation land including a 50m wide corridor established along the southern boundary to protect habitat trees and to provide connectivity between Browns Creek and the Worrigee Nature Reserve.
- Concentration of future urban development within areas demonstrated to be suitable for residential purposes.
- Establishment of Browns Creek and associated conservation land as a more substantial separation between future residential development and land capable of accommodating employment generating activities.



- Simplification of the proposal to focus on the delivery of additional residential land supply in a location immediately adjoining existing and approved residential development.

The proposal now before Gateway has evolved through the scoping process and reflects the outcomes of detailed technical investigations undertaken since that time.

Response to Issues Raised During Scoping

The scoping process identified a number of strategic and site-specific matters requiring further investigation before progression of the Planning Proposal. In response, the proponent commissioned a comprehensive suite of specialist studies addressing land use compatibility, environmental constraints, infrastructure servicing, flooding, bushfire, traffic, cultural heritage and economic impacts.

Land Use Conflict – Rifle Range

A key issue raised during the scoping process was the proximity of the site to the Nowra Rifle Range and the potential for future residential development to create operational constraints or land use conflict.

To address this issue, GHD prepared a detailed Operational Impact Assessment of the Nowra Rifle Range. The assessment considered the operation of the range, the proposed rezoning and the relationship between future residential development and the range. The assessment concluded that the proposal would not adversely affect the ongoing operation of the rifle range and that the proposed zoning framework can coexist with the established range operations.

In addition, a Noise Impact Assessment prepared by Rodney Stevens Acoustics assessed environmental noise impacts associated with the proposal and confirmed that noise considerations can be appropriately managed through future subdivision design and building controls.

The proposal has also been substantially amended since the scoping phase. The originally proposed MU1 Mixed Use zone has been removed and replaced with a



simpler residential and conservation-based zoning framework, reducing the potential for land use conflict and concentrating residential development in the most appropriate portion of the site.

Biodiversity and Environmental Constraints

The scoping process identified the need to further investigate biodiversity values, ecological connectivity and environmental constraints associated with Browns Creek and adjoining vegetation communities.

Narla Environmental prepared a Biodiversity Certification Assessment Report to accompany the Planning Proposal. The assessment comprehensively evaluates biodiversity values across the site and informs the location and extent of proposed conservation lands.

The revised proposal significantly increases the area proposed for environmental conservation and establishes a substantial conservation corridor linking adjoining bushland with Browns Creek. The conservation corridor protects ecological values, maintains habitat connectivity and provides a physical separation between future residential development and retained employment lands.

Flooding and Riparian Constraints

Flooding and floodplain management were identified as matters requiring further assessment.

A detailed Flood Impact and Risk Assessment has been prepared by CivPlan together with supporting hydraulic modelling. The assessment considers existing flood behaviour, flood storage, flood conveyance, climate change impacts and future development scenarios.

The revised zoning framework responds directly to the findings of the flood investigations by locating conservation land within flood-affected areas associated with Browns Creek and concentrating future residential development on land demonstrated to be suitable for urban development. The flood assessment confirms



that flooding constraints can be appropriately managed through future subdivision design and detailed engineering assessment.

Bushfire

The site is identified as bushfire prone land and therefore required detailed strategic assessment.

Harris Environmental Consulting prepared a Strategic Bushfire Assessment for the Planning Proposal. The assessment considered vegetation classifications, asset protection requirements, access arrangements and compliance with Planning for Bush Fire Protection 2019.

The assessment confirms that the proposed rezoning can be accommodated within an appropriate bushfire planning framework and that future development can achieve the requirements of Planning for Bush Fire Protection through detailed subdivision design.

Traffic and Access

Traffic generation and network capacity were identified as matters requiring further investigation.

Traffic assessments prepared for the proposal examined anticipated traffic generation, network performance and access arrangements associated with the proposed residential development. The investigations confirm that the surrounding road network can accommodate the projected traffic demand and identify the infrastructure framework required to support future development.

Infrastructure Servicing

The availability of infrastructure and utility servicing was identified as a key consideration during scoping.

Detailed civil engineering investigations, servicing assessments and infrastructure reports have been prepared to examine potable water, wastewater, stormwater, electrical supply and associated infrastructure requirements.



These investigations demonstrate that the site is capable of being serviced and that required infrastructure can be delivered through future development stages.

Water Quality and Water Cycle Management

The proposal is supported by a Water Cycle Management Plan addressing stormwater management, water quality outcomes and catchment protection measures. The assessment establishes a framework for stormwater treatment and management that protects Browns Creek and downstream receiving environments.

Employment Land and Strategic Planning Considerations

A key strategic issue raised during scoping was the proposed reduction in employment land.

GapMaps prepared an Economic Assessment examining employment land supply, demand and housing need across the Shoalhaven LGA. The assessment concludes that the proposal will assist in delivering additional housing supply while retaining strategically important E3 land fronting the Princes Highway. The assessment also concludes that the conservation corridor and retained E3 land ensure that the proposal does not result in unreasonable impacts on employment land supply or the operation of surrounding employment precincts.

Importantly, the revised proposal no longer seeks a MU1 Mixed Use zone. Instead, it retains approximately 6.7 hectares of E3 Productivity Support land adjacent to the Princes Highway while focusing the eastern portion of the site on residential development and environmental conservation.

Land Contamination

A Preliminary Site Investigation was undertaken by Terra Insight to assess whether contamination issues may affect the suitability of the land for residential purposes.

The investigation concluded that the site is suitable for the proposed residential development subject to implementation of recommended management measures



and compliance with Chapter 4 of the State Environmental Planning Policy (Resilience and Hazards) 2021.

Mining and Resource Constraints

Consultation was undertaken with NSW Resources regarding potential mineral resource implications.

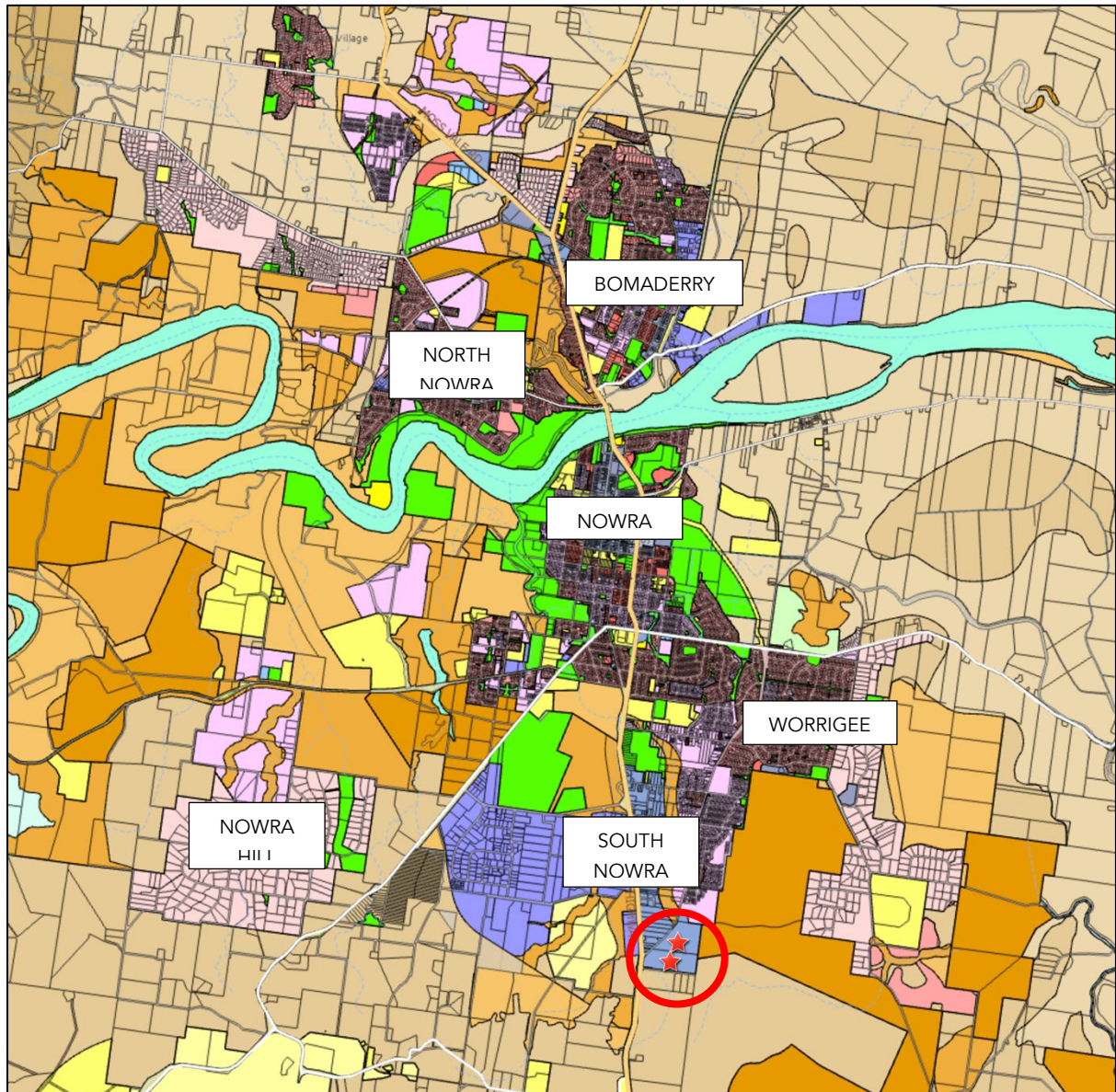
NSW Resources confirmed that there are no current exploration licences, mining leases or mining applications affecting the subject land and advised that the site has low mineral prospectivity. While a clay resource exists approximately 500 metres from the site, the proposal does not sterilise identified mineral resources.

2 Site description and surrounding area

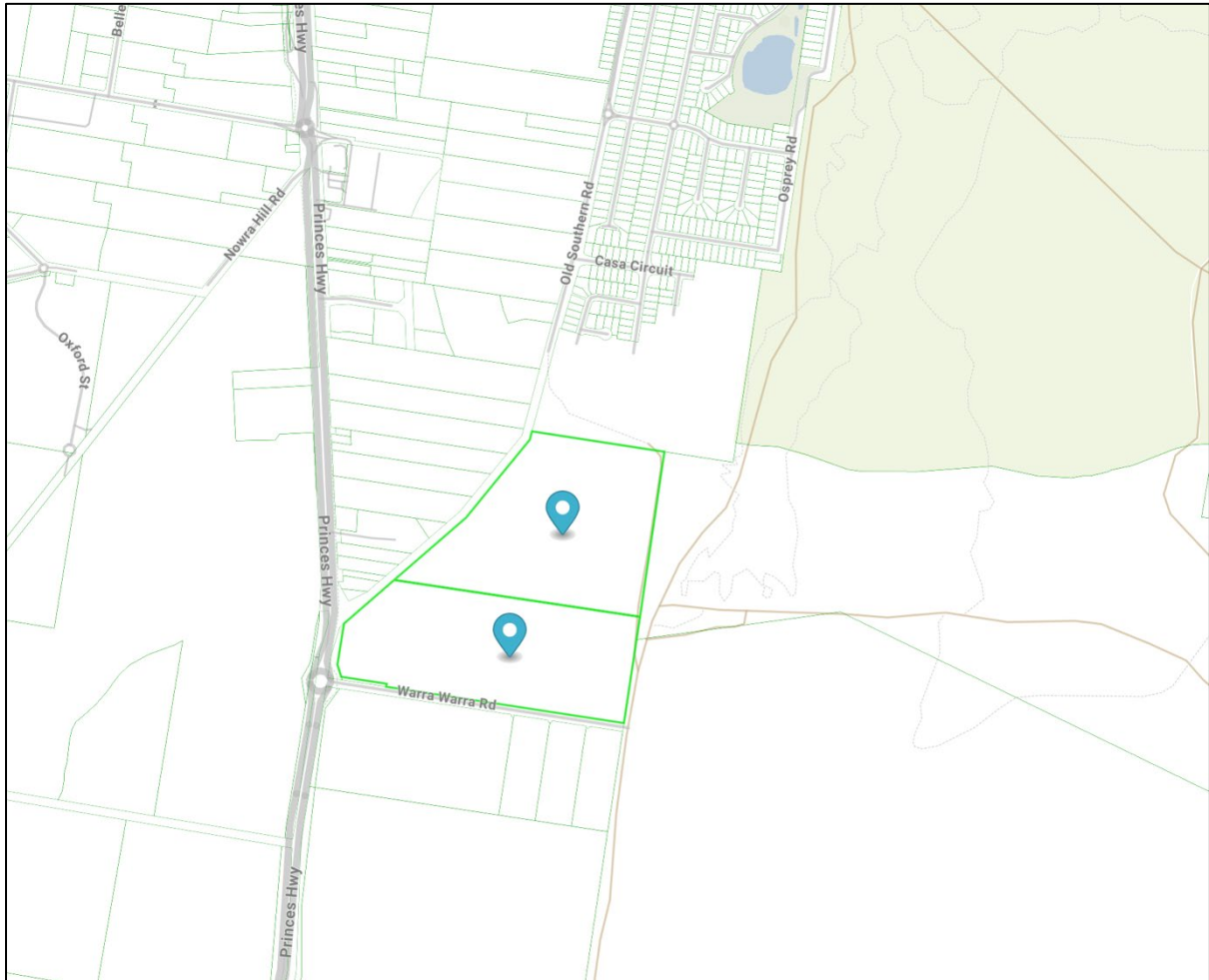
The site comprises two parcels of land as shown in the diagram below all of which is zoned E3 – Productivity Support.



Planning Proposal
Warra Warra Road South Nowra
Proposed Amendment to the Shoalhaven Local Environmental Plan 2014



Above: Location



Above: Site sketch

Key site features are summarised below:

Address: Warra Warra Road and Old Southern Road South Nowra

Legal Description: Lot 224 DP 755952 & Lot 2 DP1126288

Area: 32.39HA.

Existing Structures on Site: Nil

Bushfire Prone?: Yes

Flood Prone?: Yes

Heritage Status: Nil

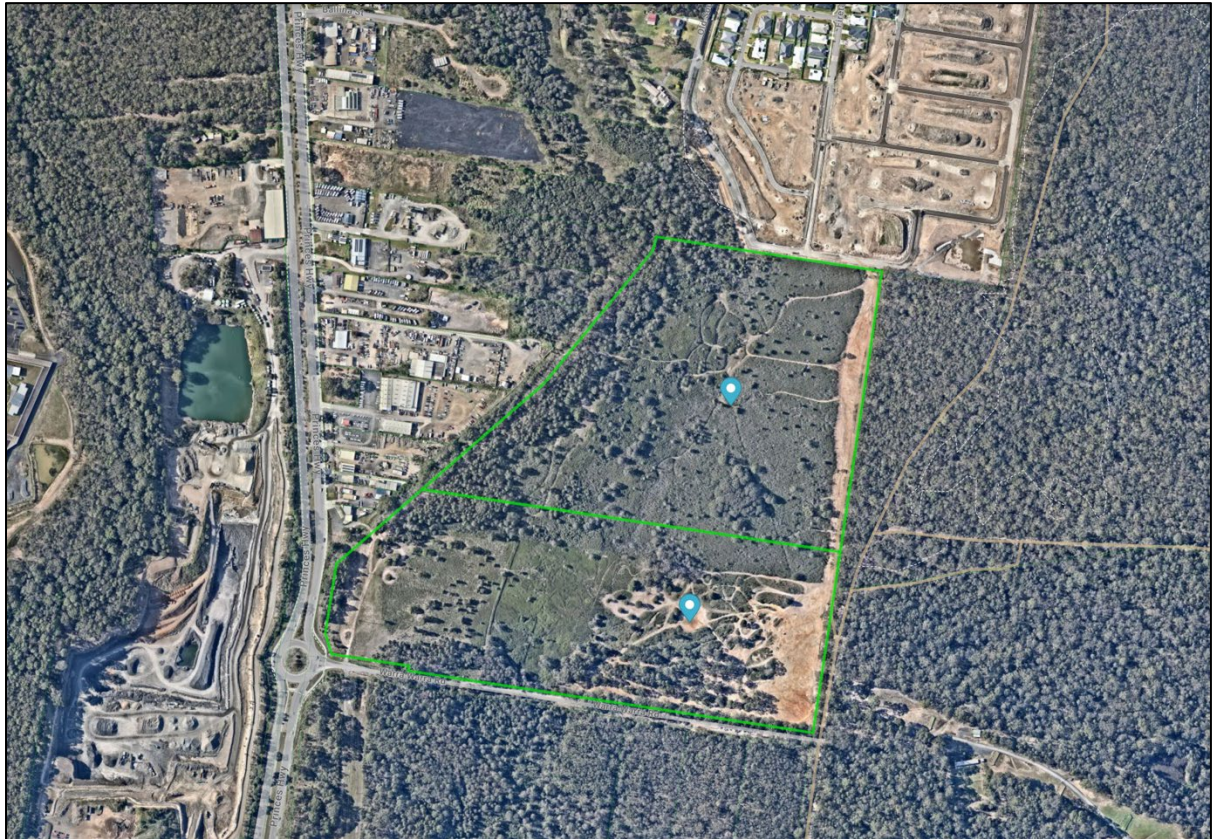
Easements / Restrictions on Title?: No

Vegetation on Site: Yes

Topography: Refer to map below.

Access: Available directly off Warra Warra Road.

Land Use Zone: E3 - Productivity Support



Above: Aerial photo of site.

The subject land defines the southern edge of the Nowra Urban Area.

Residential subdivision adjoins the site to the north. Industrial development adjoins to the northwest. State forest adjoins to the east. Privately owned bushland is to the south side of Warra Warra Road.



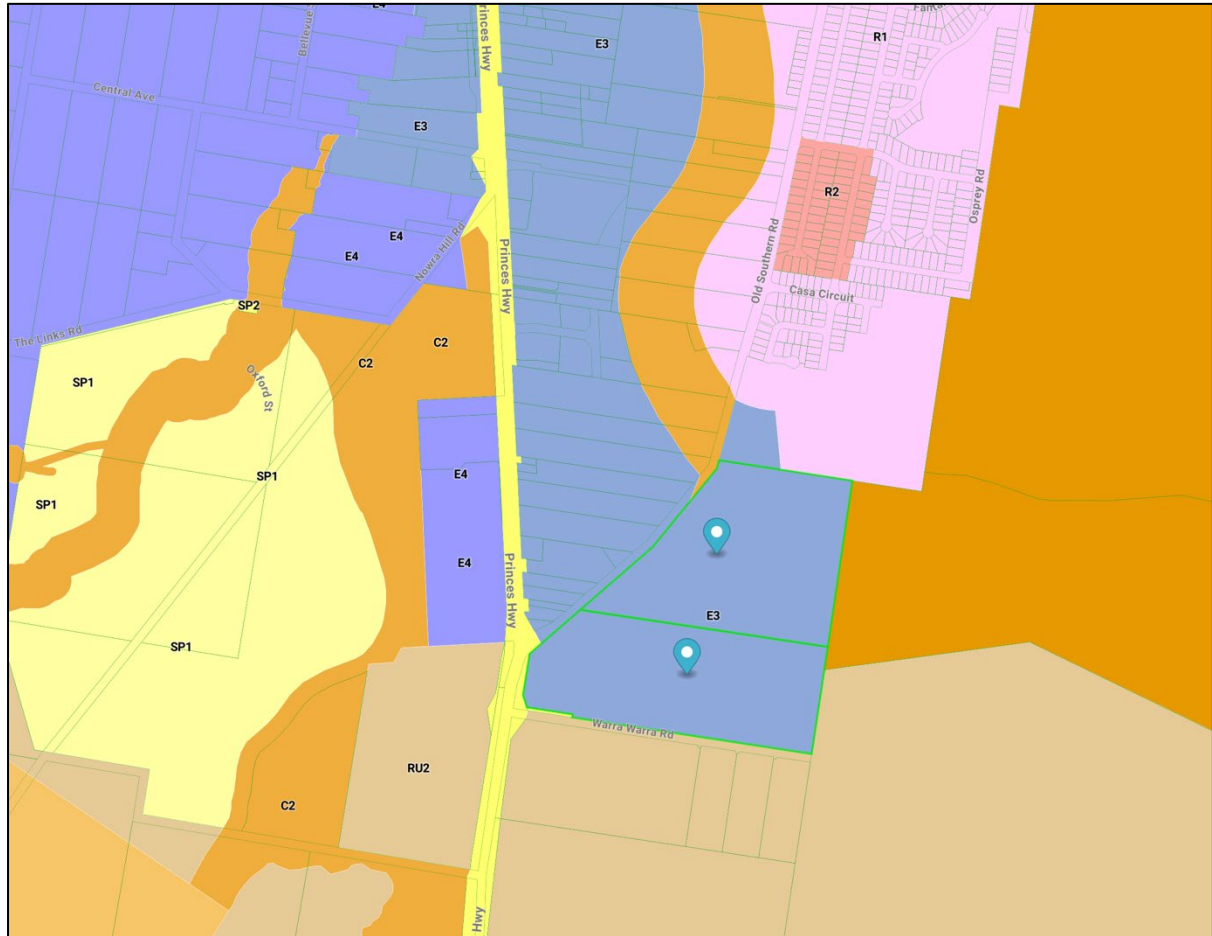
Planning Proposal
Warra Warra Road South Nowra
Proposed Amendment to the Shoalhaven Local Environmental Plan 2014



Above: Site Topography



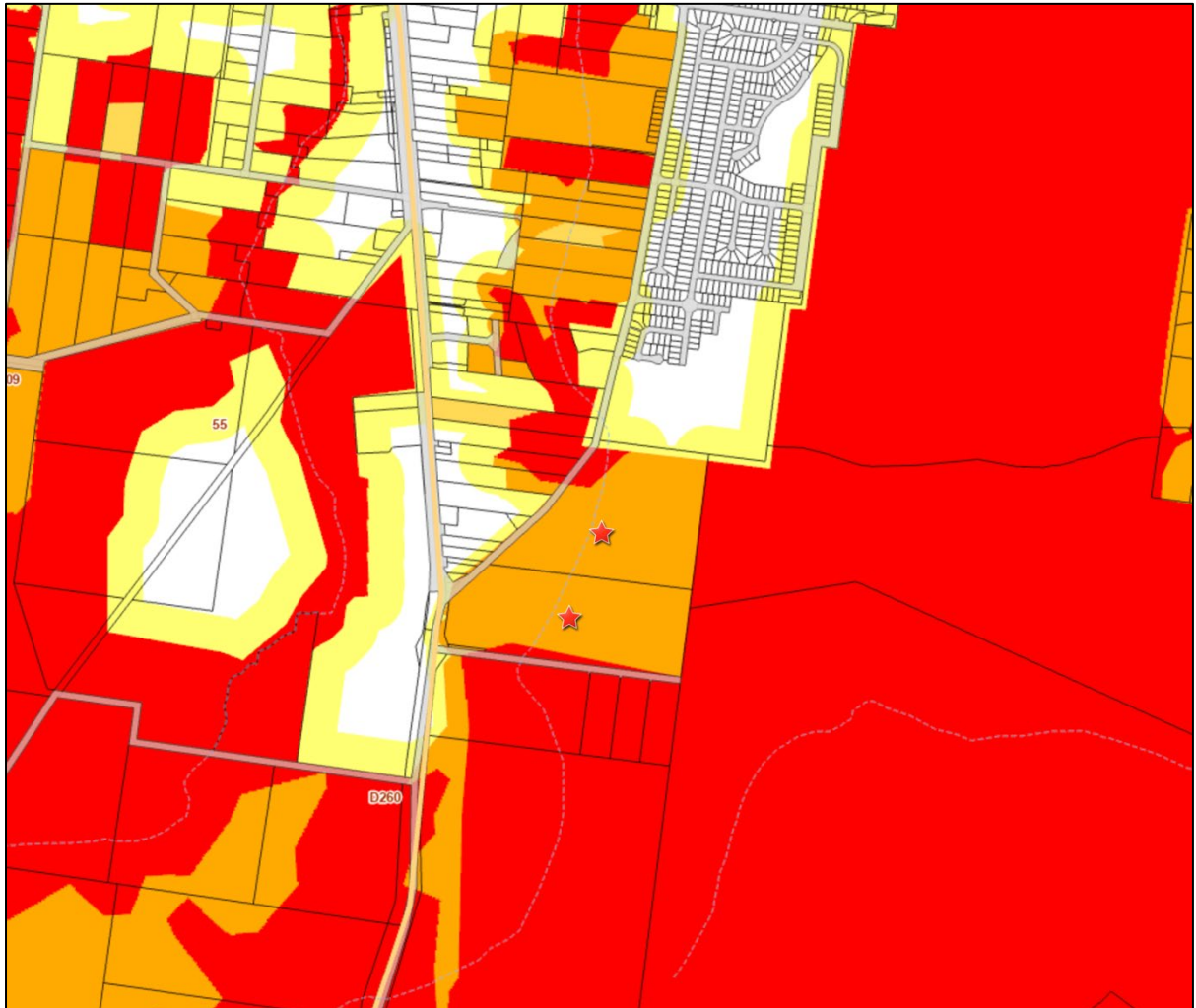
Planning Proposal
Warra Warra Road South Nowra
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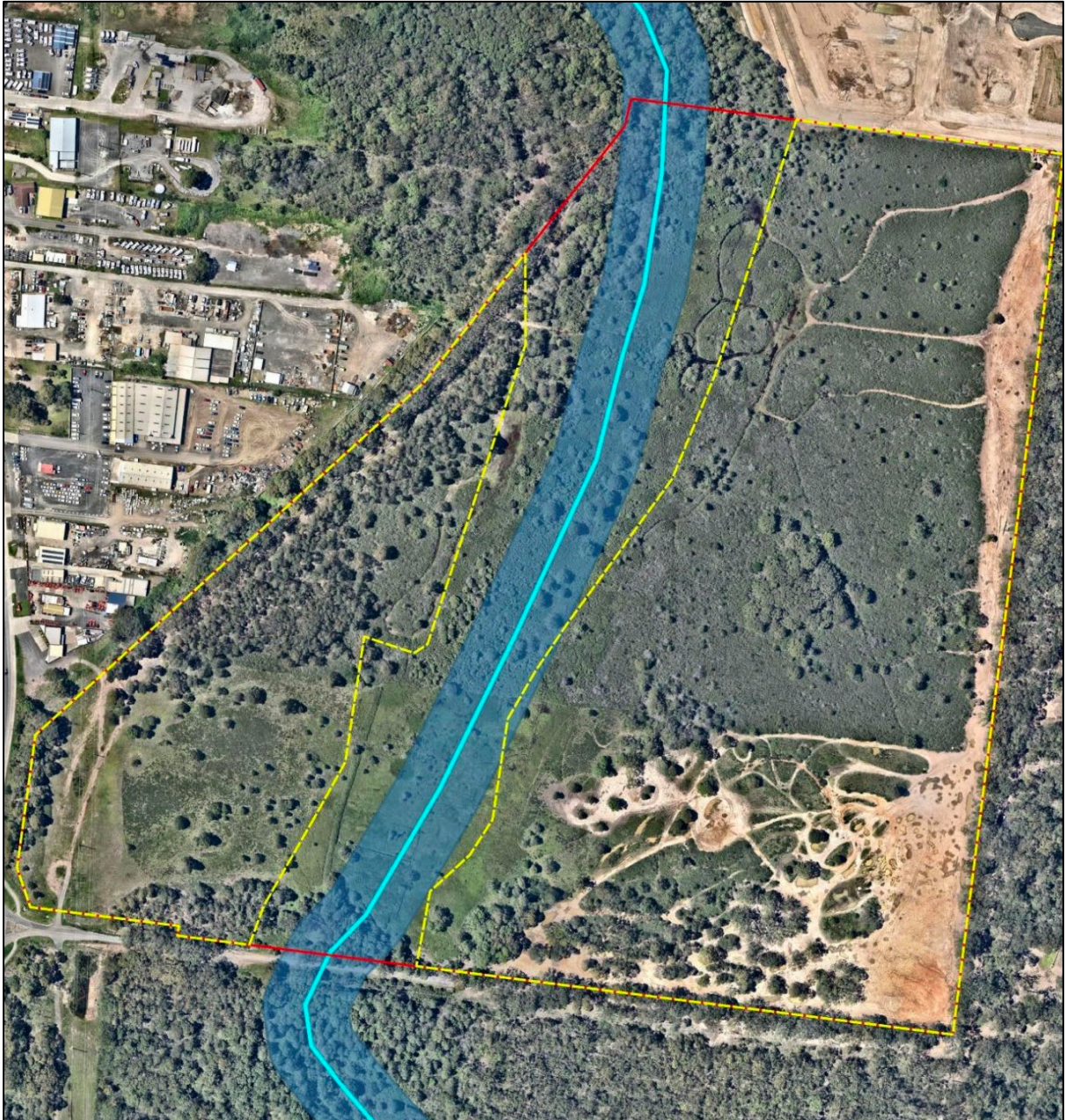
Above: Land use zones



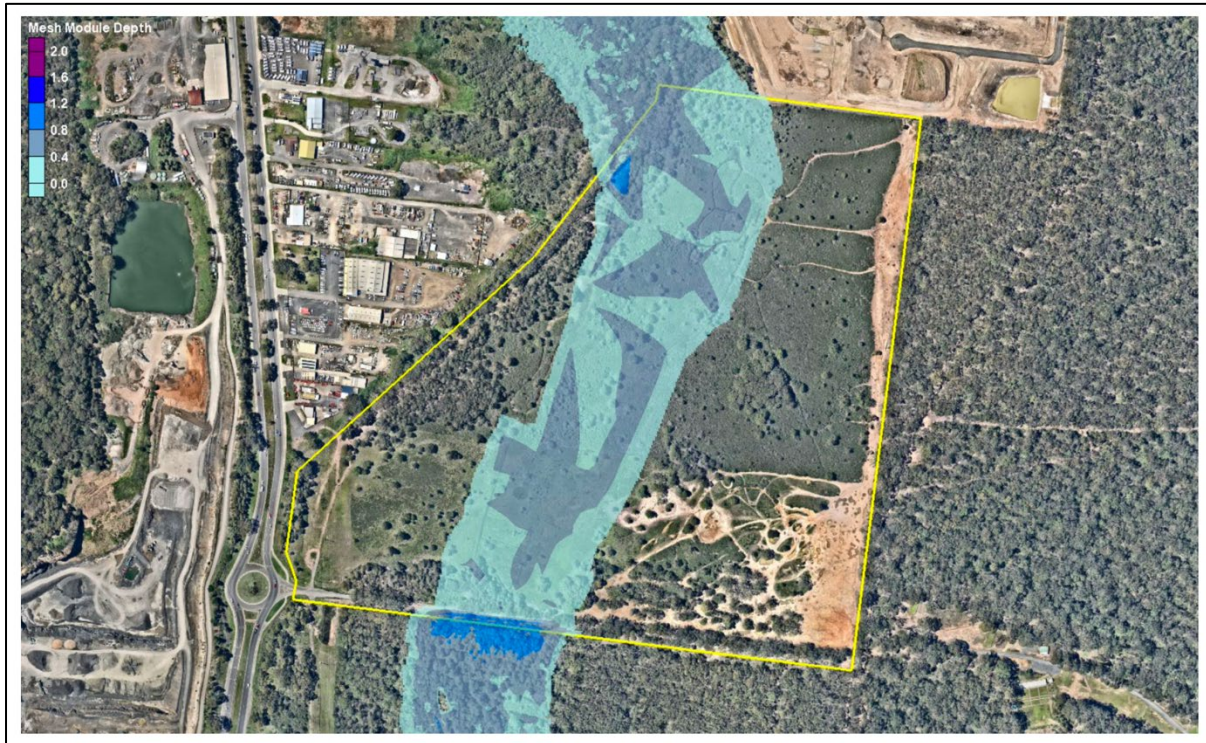
Planning Proposal
Warra Warra Road South Nowra
Proposed Amendment to the Shoalhaven Local Environmental Plan 2014



Above: Bushfire Prone Land Mapping



Above: Water Courses – Browns Creek (3rd Order Watercourse)



Above: 1% AEP Flood Extend and Depths

3 Objectives and intended outcomes

The objective of this Planning Proposal is to:

1. Facilitate residential development on existing urban zoned land adjacent to an existing residential living area;
2. To diversify housing choice;
3. Rationalise land use zoning to better reflect the physical characteristics, constraints, and strategic role of the land;
4. Protect environmentally sensitive land through the application of a C2 Environmental Conservation zone;
5. Retain viable employment land with exposure to the Princes Highway; and
6. Resolve land use conflict between existing residential areas and employment zoning.

The intended outcome is a land use structure comprising:

- A new area of R1 General Residential zoned land (16.2ha),



- A new area of C2 Environmental Conservation land (9.3ha), and
- Retained E3 Productivity Support land (6.7ha).

The intended use of the new residential area is for a greenfield residential subdivision with a target lot yield of ~202 lots.

4 Explanation of provisions

This planning proposal seeks to amend the Shoalhaven LEP 2014 to facilitate:

- 1) Residential development on part of the site.
- 2) The conservation of environmentally sensitive land.
- 3) The retention of viable employment support land.

This is to be achieved by the following mapping changes below and detailed in **Table 1:**

Control	Current	Proposed
Land Use Zone	E3	E3, R1 and C2
Minimum lot size	Not mapped	400m ² (Residential) 350m ² (Residential) 40HA (Conservation)
Additional Permitted Uses	Schedule 1.27	Schedule 1.27 mapped area reduced

Above: Table 1

Proposed Zones

- 1) The western portion of the site that has exposure to the Princes Highway is proposed to retain its E3 – Productivity Support zone, and Schedule 1.27 additional permitted uses.
- 2) Central to the site, a C2 Environmental Conservation zone is proposed over Browns Creek and its associated riparian land consistent with protections the same watercourse has been provided north of the subject land. Additionally, land along the southern boundary of the site and adjacent to Warra Warra Road is proposed to be zoned in the same manner. The land is currently zoned E3 Productivity Support.



Browns Creek and its associated riparian land ought to be protected and zoned C2 Environmental Conservation consistent with the upper reaches of the water course north of the subject land. The current E3 zone for this land is inappropriate.

- 3) The land east of Browns Creek is proposed to be zoned R1 – General Residential. The land is currently zoned E3. This has the potential to increase housing supply by up to 202 additional dwellings.

The E3 zone as it is currently located immediately adjacent to existing R1 zoned land is inappropriate and poses a risk to the amenity of established living environments. Within the E3 zone, uses such as heavy industrial storage establishments (liquid fuel depots, offensive storage establishments, hazardous storage establishments, depots, warehouses and distribution centers are permissible.

Proposed Lot Sizes

The proposal provides a transition between traditional large-lot suburban development (500m²+), and higher density forms such as multi dwelling housing.

The Planning Proposal seeks to introduce a minimum lot size of 400m² across the majority of the residential land, and 350m² within a defined central precinct.

Lots in the order of 350m² – 450m² support smaller detached dwellings, smaller households, and more attainable housing options, noting that almost 70% of dwellings in Nowra are occupied by one and two person households.

Within the Shoalhaven Local Government Area, land with a minimum lot size of 500m² or greater can be developed by way of dual occupancies and semi-detached built form outcomes.

While these forms are permissible and appropriate in some contexts, their widespread and uncoordinated delivery can result in inconsistent streetscapes, dominance of built form over landscaping, and reduced amenity outcomes.



The proposed minimum lot sizes of less than 500m² provide an alternative approach by:

- achieving increased dwelling yield through subdivision design, rather than dual occupancy proliferation; and
- enabling a more consistent and predictable built form outcome.

The proposed approach ensures better urban design outcomes, improved streetscape consistency, and a more cohesive neighbourhood character.

The proposed controls:

- respond to current housing demand,
- align with affordability objectives,
- align with the prevailing household size (1-2 persons), and
- provide a modern alternative within a strategic growth area.

The introduction of a 350m² minimum lot size within a defined central area:

- allows for slightly higher density in an appropriate location,
- supports housing diversity, and
- creates a logical transition within the subdivision.

This ensures density is targeted and controlled, not uniform or excessive.

The proposed minimum lot size controls:

- implement regional and local strategic objectives,
- deliver housing diversity and affordability,
- provide a planned approach to density, and
- avoid unintended built form outcomes associated with larger lots.

The controls are therefore strategically justified, contextually appropriate, and essential to achieving the intended urban design outcomes of the proposal.



Additional Permitted Uses

The PP seeks amendment to the Additional Permitted Uses Map to reduced the extent to which Schedule 1.27 applies to the land.

Currently all of the site benefits from the following additional permitted use:

26 Use of certain land at Bomaderry, Culburra Beach, Nowra, Sanctuary Point, South Nowra and Ulladulla

(1) This clause applies to land identified as "Sch 1.27" on the Clauses Map.

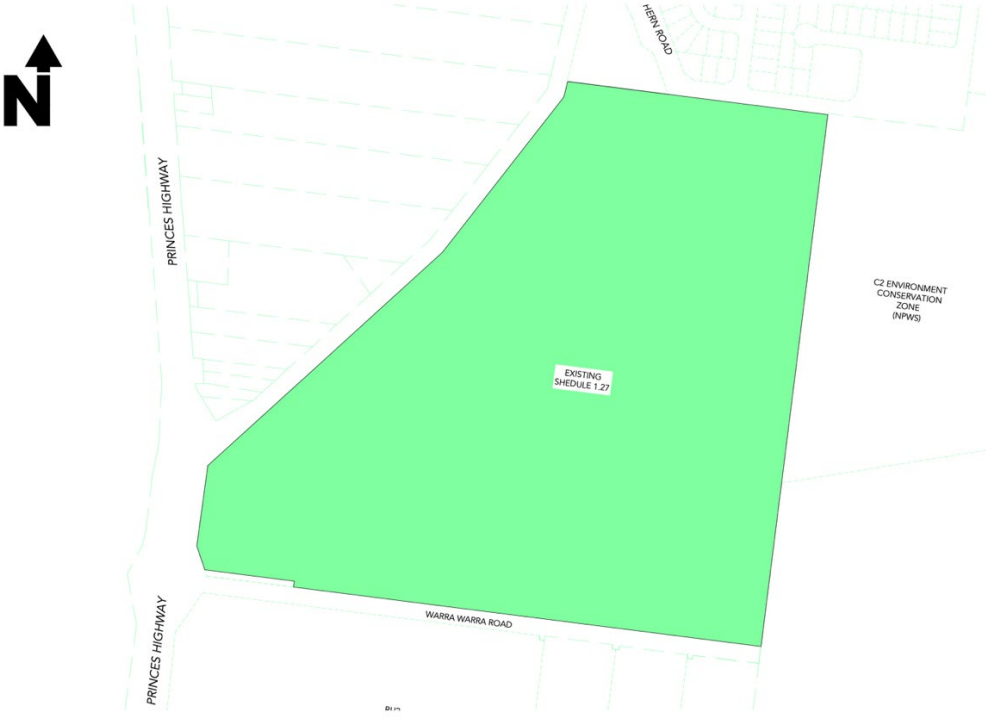
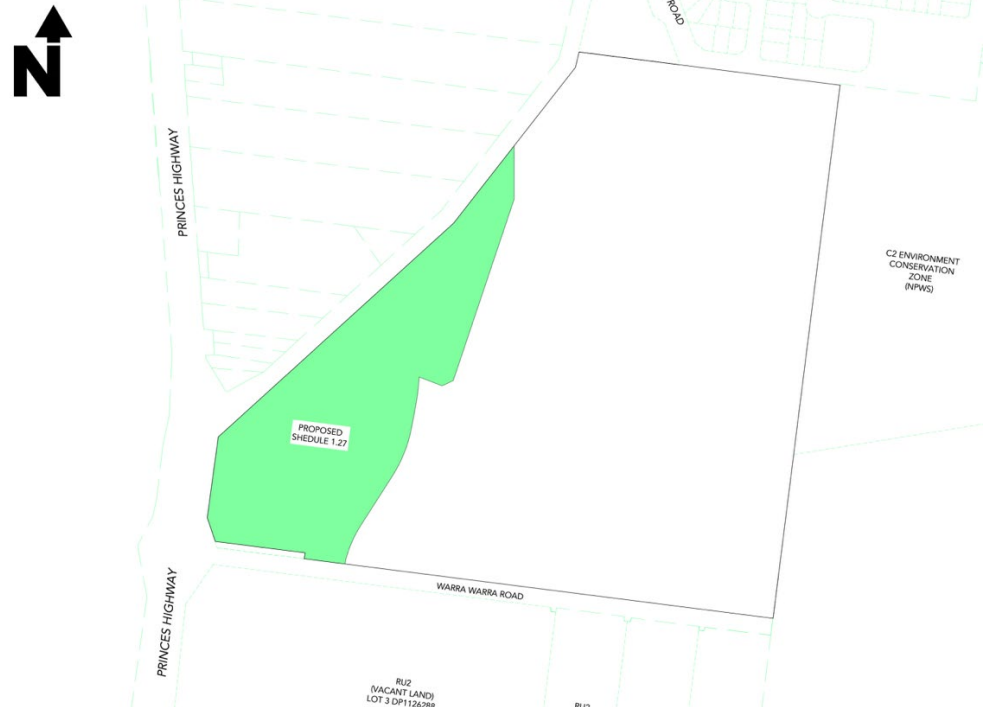
(2) Development for the purposes of retail premises, signage and transport depots is permitted with development consent.

The changes proposed to the land use zone maps trigger the need to change the additional permitted uses maps, such that the extent of the site identified as Sch 1.27 is limited to that land zoned E3 – Productivity support.

The maps below outline the existing LEP map sheets and the proposed mapping amendments.





EXISTING ADDITIONAL PERMITTED USE	
PROPOSED ADDITIONAL PERMITTED USE	



5 Justification of strategic and site-specific merit

Strategic Merit

5.1 Section A – Need for the Planning Proposal

Is the planning proposal a result of an endorsed LSPS, strategic study or report?

This planning proposal is proponent initiated and the result of a request from its owners to change the planning controls that relate to the site.

The site is located in South Nowra and while it is not directly identified in a current strategic study or plan as a future residential area, it is found to be consistent with, the Illawarra Shoalhaven Regional Plan 2041 and the Shoalhaven 2040 Local Strategic Planning Statement, particularly as they relate to the general objectives of housing.

The proposal would provide significant public benefit, by protecting land with environmental values, and delivering housing, which, is needed. Shoalhaven Council's housing target is 4,900 completed homes by 2029 in line with the National Housing Accord. By delivering housing, this proposal represents a positive response to the ongoing housing crisis in NSW.

The planning proposal also includes a number of supporting studies. Together they describe how the proposal is consistent with strategic framework.

Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

This planning proposal seeks to amend the Shoalhaven LEP 2014. The amended controls as proposed will facilitate additional housing and improved conservation of Browns Creek and associated riparian land.

Amending the Shoalhaven LEP 2014, is the best means of achieving the objectives of the planning proposal.



The current E3 zoning:

- is inconsistent with adjoining residential land,
- permits uses incompatible with residential amenity, and
- does not reflect the site's constraints or market function.

The proposal provides a clear, zone-based solution by:

- allocating residential land where appropriate,
- protecting environmental land, and
- retaining only viable employment land.

No alternative mechanism can achieve this outcome.

5.2 Section B – Relationship to the Strategic Planning Framework

Will the planning proposal give effect to the objectives and actions of the applicable regional or district plan or strategy (including any exhibited draft plans or strategies?)

Table 2 presents an assessment of the applicable objectives and strategies of Illawarra Shoalhaven Regional Plan 2041 against this proposal:

Table 2: Applicable objectives and strategies of Illawarra Shoalhaven Regional Plan 2041 (ISRP 2041)

Objective	Comment
Objective 2: Grow the region's regional cities	The proposal is consistent with Objective 2 as it facilitates additional housing within the Nowra-Bomaderry growth area, one of the region's designated growth areas intended to support the ongoing development of Nowra as a regional city. By accommodating approximately 202 additional dwellings within South Nowra, the proposal will increase the resident population that relies upon Nowra for employment, education, health, retail, cultural and recreational services. The additional population will support the continued growth, vitality and economic function of Nowra City Centre, reinforcing its role as Shoalhaven's principal commercial, administrative and service centre. The proposal therefore contributes to the Regional Plan's objective of growing the region's regional cities and supporting the long-term growth and activation of Nowra.



Objective 4: Activate regionally significant employment precincts to support new and innovative economic enterprises	The proposal retains the most commercially viable E3 Productivity Support land fronting the Princes Highway, while rezoning land that has limited practical employment potential due to its lack of highway exposure and commercial attractiveness. The broader Shoalhaven LGA has a substantial surplus of undeveloped E3 and E4 employment land, equating to approximately 60–70 years of supply at current take-up rates. The proposal therefore does not compromise the long-term function of the South Nowra Employment Precinct and will continue to support employment growth through retained employment land, home-based businesses and the provision of housing for the local workforce.
Objective 7: Respond to the changing nature of retail	The proposal supports the viability and growth of existing centres. The future resident population generated by the proposal will increase expenditure within the Nowra City Centre and surrounding employment precincts, strengthening the role of established centres as the focus for retail, commercial and service activities.
Objective 11: Protect important environmental assets	The proposal has been designed to avoid, minimise and offset impacts on biodiversity values. The western portion of the site is unaffected by the proposal and retains its existing zoning, while a 50-metre-wide C2 Conservation Zone will be established along the southern boundary to protect habitat trees and formalise ecological connectivity between the Browns Creek and the Worrigee Nature Reserve. The proposal also seeks to protect Browns Creek and its associated riparian corridor with a newly proposed conservation zone in place of the current employment zone.
Objective 12: Build resilient places and communities	The proposal has been informed by detailed flood and bushfire investigations which demonstrate that natural hazard risks can be appropriately managed. The Strategic Bushfire Assessment confirms that future development can achieve compliance with Planning for Bush Fire Protection 2019 through the provision of asset protection zones, perimeter roads, emergency access and appropriate servicing. The Flood Impact and Risk Assessment includes modelling of flood behaviour, flood risk and climate change scenarios to the year 2100 and demonstrates that future development can be designed to manage flood impacts while protecting the Browns Creek corridor and maintaining the flood function of the site. The proposed residential area is not affected by coastal hazard risks.
Objective 13: Increase urban tree canopy cover	Street tree planting opportunities can be considered which do not compromise bush fire safety requirements such as Asset Protection Zone (APZ) to accommodate trees/shrubs



	within the proposed development, especially along proposed road reserves.
Objective 14: Enhance and connect parks, open spaces and bushland with walking and cycling paths.	The area of land proposed to be rezoned to residential is positioned between existing residential development to the north, Browns Creek to the West and State Forest to the east.
Objective 15: Plan for a Net Zero region by 2050	The proposed residential area is within walking and cycling distance of local services. This is consistent with the goal of reducing transport emissions by reducing frequency of car trips to local facilities.
Objective 17: Secure water resources	The proposal is consistent with Objective 17 as it incorporates a comprehensive Water Cycle Management Plan that applies WSUD principles, including bioretention basins, rainwater harvesting, on-site detention and stormwater quality treatment measures. The proposal protects the Browns Creek corridor through C2 Environmental Conservation zoning, achieves Council stormwater quality targets through MUSIC modelling, reduces post-development stormwater flows to pre-development levels, and promotes sustainable water reuse through rainwater harvesting and Smart Tank technology.
Objective 18: Provide housing supply in the right locations	The proposal seeks to expand the existing residential area in the locality. The proposal delivers 16.2ha of residential land within the existing Nowra urban area, consistent with the objective of locating housing in serviced and accessible locations. The <i>Illawarra Shoalhaven Regional Plan 2041</i> identifies Nowra-Bomaderry as a growth area, and opportunities to increase housing supply that are in keeping with Council's long-term vision should be considered. The subject land is both a valuable and untapped resource that can accommodate additional much needed well placed development. Nowra is identified for urban growth by the Regional plan, the proposal is not inconsistent with it. Strategy 18.2 of the Regional Plan aims to facilitate housing opportunities in existing urban areas, particularly within strategic centres. The strategy states that: <i>Strategic planning and local plans should consider opportunities to:</i> • <i>review planning controls so that they are creating flexible and feasible conditions for housing supply</i>



	• <i>align infrastructure and service delivery to match housing supply needs</i> • <i>explore public domain improvements that would increase capacity for growth</i> • <i>identify policies and processes that could be reviewed to improve certainty and streamline development processes</i> • <i>promote urban design outcomes to support healthy and vibrant communities.</i> The proposal is consistent with strategy 18.2 for the following reasons: 1) The PP seeks to review planning controls to increase the supply of housing. 2) The locality is one that has good levels infrastructure and services. 3) The ultimate urban design outcome would support a healthy community.
Objective 19: Deliver housing that is more diverse and affordable	The proposed residential zone would facilitate the delivery of additional housing in South Nowra. The proposed minimum lot size of 350m² – 400m² allows for a mix of housing types and sizes including small lots. Irrespective of proposed minimum lot size controls, the proposal provides opportunities to increase housing choices as the proposed R1 zone allows for different housing types such as detached dwellings, dual occupancies (attached and detached), group homes, multi dwelling housing, residential flat buildings etc. The proposal is entirely consistent with objective 19.
Objective 21: Respond to the changing needs of local neighbourhoods	The proposal is not inconsistent with objective 21, which, has only limited application to the proposal. The objective and associated strategy do not impact on the proposal to provide additional housing in South Nowra.
Objective 22: Embrace and respect the region's local character	The Shoalhaven Local Character Assessment prepared by Roberts Day for the Shoalhaven City Council sets out the future desired character of South Nowra as follows: <i>South Nowra, West Nowra and Worrigea will become inspiring, attractive and well established neighbourhoods with a local flair. Continuing to provide residential support to central Nowra, they will maintain their suburban character and provide affordable and diverse housing options for residents in close proximity to retail and services. Improved connections will bring together what is currently fragmented parts, including improved cycling and</i>



	<i>walking connections to encourage greater uptake of active travel to Nowra CBD. The introduction of small local hubs, increased street tree planting, greater diversity of accessible open spaces, and more community services will help to define a stronger, more localised character and support a growing community. The neighbourhoods will continue to offer residents what they need, while also improving lifestyle opportunities and connection to place.</i> The proposal to rezone part of the site from E3 to R1 (General Residential) is consistent with the future character of South Nowra for the following reasons: 1) The proposal facilitates additional residential support for central Nowra. 2) A key aim of the proposal is to provide for a greater diversity of housing and thus more affordable housing. 3) The housing proposed will be in close proximity to retail and other services.
Objective 23: Celebrate, conserve, and reuse cultural heritage	An Aboriginal Cultural Heritage Assessment (ACHA) has been prepared by Apex Archaeology in accordance with the <i>Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW</i>, the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010</i> and the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales</i>. The assessment included consultation with Registered Aboriginal Parties (RAPs), archaeological investigations and consideration of both tangible and intangible Aboriginal cultural heritage values. Eleven Aboriginal organisations and individuals registered as RAPs for the project and were provided opportunities to participate throughout the assessment process. The archaeological survey identified no Aboriginal objects, no Aboriginal sites and no areas of archaeological potential within the study area. The assessment concluded that the site has been substantially disturbed by historical land clearing, earthworks, infrastructure construction, illegal dumping and recreational vehicle activity, and is unlikely to retain Aboriginal archaeological deposits. The ACHA concludes that the Aboriginal archaeological potential of the site is negligible, no further archaeological assessment is required, and no Aboriginal Heritage Impact Permit (AHIP) is necessary. Appropriate unexpected finds and stop-work procedures are nevertheless recommended



	should Aboriginal objects or human remains be encountered during future works. Accordingly, the proposal has appropriately identified, assessed and considered Aboriginal cultural heritage values and establishes measures to protect any unforeseen heritage items, demonstrating consistency with Objective 23 of the Regional Plan.
Objective 27: Protect major freight networks	The proposal does not impact on major freight networks.
Objective 28: Create connected and accessible walking and cycling networks	Detailed designs for walking and cycling facilities are best addressed at subdivision stage and in the event this planning proposal is supported. There are many opportunities for a future living area within the proposed R1 zoned land to be provided with good pedestrian facilities that connect with existing networks.

Is the planning proposal consistent with a Council LSPS that has been endorsed by the Planning Secretary or GSC, or other endorsed local strategy or strategic plan?

Assessment against Council's Local Strategic Planning Statement (LSPS) is summarised in table 3.

Table 3: Applicable Planning Priorities of Council's LSPS

Planning Priority schedule	Comment
1 - Providing homes to meet all needs & lifestyles	The proposed residential zoning will facilitate a range of housing types and densities within the South Nowra urban area. The site is located in proximity to employment lands, services, community facilities and public transport, supporting the creation of a well-connected residential community. The <i>Shoalhaven 2040 Our Strategic Land-use Planning Statement</i> identifies that Shoalhaven's population is expected to increase by more than 23,000 people by 2041, average household sizes are expected to decline, and more than 14,600 new dwellings will be required to meet future housing demand. The proposal will contribute to the delivery of additional housing supply within the Nowra-Bomaderry growth area, supporting Council's objective of providing homes to meet a range of needs and lifestyles. The proposal provides for a diversity of lot sizes, ranging from approximately 363m² to 774m², enabling a variety of housing outcomes. Development adjoining the existing residential area to the north will be compatible with the established neighbourhood character, while larger lots and lower-density outcomes can be achieved in other parts of the site. Accordingly, the proposal is consistent with Planning Priority 1 – Providing homes to meet all needs and lifestyles.



2 - Delivering Infrastructure	The proposal represents a logical extension of the South Nowra urban area and is supported by detailed infrastructure investigations. The Services Infrastructure Report confirms that potable water supply, wastewater servicing, electricity supply and telecommunications infrastructure can be provided to the site, with servicing strategies identified in consultation with Shoalhaven Water and Endeavour Energy. The reports conclude that the site can be adequately serviced by existing and planned infrastructure networks, with water capacity available, sewer servicing achievable through new pump station infrastructure, electrical supply available from the South Nowra Zone Substation and NBN fibre services capable of being extended to the development. Accordingly, the proposal promotes efficient delivery and utilisation of infrastructure in a location adjoining the existing urban area.
3 - Providing Jobs closer to home	South Nowra is a major employment / business centre. The proposal is consistent with this planning priority as it seeks to provide residential accommodation within the same suburb.
4 - Nowra City Centre	Planning Priority 4 seeks to strengthen Nowra City Centre as Shoalhaven's principal commercial, administrative, employment and service centre. The Economic Impact Assessment demonstrates that the proposal will accommodate additional population within the Nowra-Bomaderry urban area, increasing demand for retail, commercial, health, education and community services located within Nowra City Centre. The assessment concludes that the proposal will generate additional local expenditure, support employment growth and contribute to the economic vitality of the broader Nowra area. By providing additional housing in proximity to established employment lands, services and infrastructure, the proposal supports the role of Nowra as the regional centre of Shoalhaven and contributes to the ongoing growth and activation of the Nowra City Centre.
5 - Ulladulla Town Centre	N/A
6 - Strengthening commercial centres	Planning Priority 6 seeks to strengthen the role and viability of existing commercial centres by directing growth to locations that support local businesses, services and employment opportunities. The proposal will accommodate approximately 520 additional residents who will generate ongoing demand for retail, commercial and community services within existing centres, particularly Nowra. The additional population will increase local expenditure, support business growth and reinforce the viability of established commercial centres without creating a competing retail destination. Accordingly, the proposal contributes to the strengthening of Shoalhaven's commercial centres and is consistent with Planning Priority 6.
7 - Responsible visitor economy	The proposal will increase housing supply within the Nowra-Bomaderry urban area, supporting the workforce required to service Shoalhaven's visitor economy, including tourism, hospitality and accommodation sectors.



	The proposal is located within an existing urban area and does not adversely affect tourist destinations, visitor infrastructure or tourism assets.
8 - Supporting Agriculture & Aquaculture	The site is not identified as productive agricultural or aquaculture land. The proposal is located within the South Nowra urban area and does not result in the loss or fragmentation of agricultural land resources or create land use conflicts with agricultural activities.
9 - Industrial & defence-related opportunities	While the proposal involves the rezoning of part of an existing employment zoned site, the Economic Impact Assessment demonstrates that the subject land has limited industrial development potential and that substantial undeveloped employment land remains available within South Nowra and the broader Shoalhaven. The proposal retains the most commercially attractive employment land and will provide housing to support the local workforce employed within nearby industrial and defence-related precincts.
10 - Protecting the environment	The proposal incorporates extensive environmental protection measures, including retention of significant vegetation, protection of the Browns Creek corridor, establishment of a conservation zone, biodiversity offsets and long-term environmental management measures.
11 - Adapting to natural hazards through building resilience	Detailed flood and bushfire assessments demonstrate that future development can appropriately manage identified natural hazards through suitable subdivision design, asset protection zones, evacuation access, stormwater management and climate change adaptation measures.
12 - Managing resources	The proposal incorporates Water Sensitive Urban Design principles, stormwater quality treatment, rainwater harvesting and water reuse measures. The site's proximity to employment areas, services and infrastructure also supports efficient use of existing resources and reduced vehicle dependence.
13 - Protecting & enhancing neighbourhoods	The proposal will provide additional housing within a logical extension of the South Nowra residential area while integrating with surrounding development, protecting environmental assets and providing access to open space, conservation areas and community infrastructure.
14 - Heritage items and places	Aboriginal and historic heritage investigations have been undertaken. The Aboriginal Cultural Heritage Assessment concluded that no Aboriginal objects, sites or areas of archaeological potential were identified within the study area and no further heritage approvals are required.
15 - Scenic & cultural landscapes	The proposal protects environmentally sensitive land associated with Browns Creek and surrounding vegetation corridors, maintaining important landscape values while directing urban development to land adjoining the existing urban area.
16 - Promoting events & art	While the proposal is not specifically directed toward events or public art, it will contribute to population growth within the Nowra-Bomaderry area, supporting the viability and utilisation of community facilities, cultural activities and public spaces.



Is the planning proposal Consistent with any other applicable State and regional studies or strategies?

The Shoalhaven Growth Management Strategy (GMS)

The planning proposal is consistent with the Shoalhaven Growth Management Strategy (GMS).

The GMS recognises the need to identify additional urban land capable of accommodating future population growth and housing demand while ensuring that environmental constraints and infrastructure requirements are appropriately addressed. The Strategy identifies that Shoalhaven is expected to experience substantial population growth and will require significant additional housing supply to meet future needs.

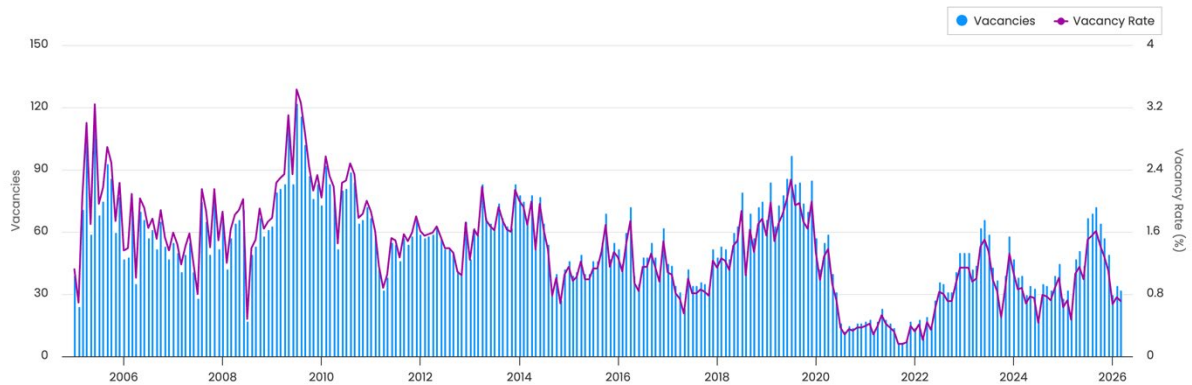
The proposal will facilitate approximately 202 additional dwellings within the Nowra-Bomaderry growth area, contributing to the supply of housing in a strategically appropriate location adjoining the existing South Nowra urban area. The proposal is supported by detailed investigations relating to biodiversity, flooding, bushfire, traffic, infrastructure servicing, contamination and Aboriginal cultural heritage, demonstrating that the site is capable of accommodating residential development in a sustainable manner.

The need for additional housing is further evidenced by current market conditions. Residential vacancy rates within postcode 2541 are approximately 0.7%, indicating an extremely constrained housing market and a significant shortage of available housing stock. The proposal will assist in increasing housing supply and improving housing choice within the Shoalhaven Local Government Area.

Postcode: 2541

Vacancy Rates

Source: SQM Research



Accordingly, the proposal is consistent with the objectives and strategic intent of the Shoalhaven Growth Management Strategy by facilitating additional housing in a serviced urban location where local housing demand has been demonstrated.

Shoalhaven 2032 Community Strategic Plan

One of the priorities for Theme 2 (Sustainable, Liveable Environments) of the Shoalhaven 2032 Community Strategic Plan is to plan and manage appropriate and sustainable development to provide for population growth. Community concerns identified in the Plan include protection of the natural environment, preserving the Shoalhaven's unique environmental values and ensuring development occurs in an appropriate and sustainable manner.

A key challenge identified in the Community Strategic Plan relates to housing affordability and diversity:

"Ever increasing price of housing and lack of affordable stock and housing options, particularly for people on low incomes, people with a disability and young people."

The proposal seeks to facilitate additional housing supply within the South Nowra urban area and responds directly to identified housing demand within the Shoalhaven. The proposal will:



- increase the supply of residential land and housing opportunities within the Nowra-Bomaderry growth area;
- provide opportunities for a range of housing outcomes in close proximity to employment lands, services and facilities within South Nowra and Nowra;
- support housing affordability through the provision of additional housing stock in an area experiencing significant housing demand; and
- protect environmentally sensitive land through the application of environmental conservation zoning and the retention of key biodiversity corridors and habitat areas.

Accordingly, the proposal balances the need to accommodate population growth and housing demand with the protection of important environmental values and is therefore consistent with the Shoalhaven 2032 Community Strategic Plan.

Nowra Bomaderry Structure Plan (NBSP)

The Nowra Bomaderry Structure Plan (NBSP) establishes the long-term strategic framework for growth within the Nowra-Bomaderry area and recognises Nowra's role as the Shoalhaven's principal commercial, administrative and service centre. The NBSP seeks to accommodate population growth whilst balancing environmental conservation, economic vitality and community wellbeing. The Structure Plan also recognises the importance of directing growth to locations that support the ongoing role and function of Nowra as the region's primary centre.

The subject site was not identified as one of the nominated future living areas within the NBSP. However, the Structure Plan was prepared between 2005 and 2008 and was based on the demographic forecasts, housing demand assumptions and strategic planning considerations applicable at that time. Since adoption of the NBSP, the Shoalhaven has experienced significant population growth, increasing housing affordability pressures, declining rental vacancy rates and a growing need for additional housing supply.



Importantly, the NBSP projected that the population of the Nowra-Bomaderry area would increase from approximately 30,000 people in 2001 to more than 53,000 people by 2036, representing an increase of approximately 23,500 residents. More recent population data indicates that the Nowra-Bomaderry area had a population of approximately 38,239 people in 2021, demonstrating that substantial additional population growth is still required to achieve the Structure Plan's long-term growth projections.

The proposal will facilitate approximately 202 additional dwellings on 16.2 hectares of residential land, equating to a gross residential density of approximately 12.9 dwellings per hectare. This density is consistent with contemporary greenfield residential development outcomes and represents an efficient use of serviced urban land. The proposal is not characterised by high-density development but instead provides a balanced housing outcome that supports increased housing supply whilst maintaining an appropriate residential character.

The site is located adjacent to the existing South Nowra urban area and in close proximity to employment lands, community facilities, educational establishments, retail services and the Nowra City Centre. The proposal therefore supports the strategic intent of the NBSP by increasing the population base that supports the role and function of Nowra as the region's principal commercial and administrative centre.

The proposal also responds to contemporary environmental planning requirements that have evolved since the preparation of the NBSP. Detailed biodiversity, flooding, bushfire, contamination and cultural heritage investigations have informed the site design. Significant environmental areas associated with Browns Creek and identified biodiversity values are proposed to be retained and protected through environmental conservation zoning, ensuring that housing growth is balanced with the protection of important environmental assets.

Whilst the proposal differs from the specific urban release areas identified within the NBSP, it is consistent with the broader strategic objectives of the Structure Plan by facilitating additional housing within the Nowra-Bomaderry urban area, supporting the continued growth of Nowra as a regional centre, making efficient use of existing



infrastructure and protecting significant environmental values. Accordingly, the proposal is considered to be broadly consistent with the strategic intent and desired outcomes of the Nowra Bomaderry Structure Plan.

Shoalhaven Affordable Housing Strategy 2024.

The planning proposal is strongly consistent with the Shoalhaven Affordable Housing Strategy 2024.

The Strategy identifies a significant housing affordability crisis within the Shoalhaven and estimates that the Local Government Area is experiencing a shortfall of approximately 3,300 affordable dwellings. The Strategy also identifies more than 4,100 households that are experiencing unaffordable rental costs and recognises the need for increased housing supply, housing diversity and the delivery of low-cost housing options throughout the LGA.

Importantly, the Strategy recognises that improving housing affordability is not limited to the delivery of subsidised affordable housing. The Strategy specifically supports the provision of diverse low-cost market housing and identifies high demand for smaller dwelling sizes together with a limited existing supply of such housing within the Shoalhaven. It also identifies increasing dwelling diversity and supporting higher density outcomes in appropriate locations as key actions to improve housing affordability outcomes.

The proposal will facilitate approximately 202 additional dwellings within South Nowra and will provide a range of lot sizes capable of accommodating a broader diversity of housing outcomes than is currently available within the local market. The inclusion of smaller residential lots will reduce the underlying land cost associated with each dwelling and create opportunities for more attainable housing products for first home buyers, key workers, smaller households, downsizers and moderate-income households.

The proposal is located adjacent to existing employment lands, community facilities and services within South Nowra and the Nowra City Centre. This location aligns with the Strategy's objective of ensuring housing is provided in well-serviced locations that allow residents to live in proximity to employment opportunities and



essential services. By increasing housing supply, improving housing diversity and facilitating more affordable housing outcomes through a variety of lot sizes, the proposal directly responds to the housing challenges identified in the Shoalhaven Affordable Housing Strategy 2024.

Accordingly, the proposal is considered to be strongly consistent with the objectives and strategic directions of the Shoalhaven Affordable Housing Strategy 2024.

Housing 2041 – NSW Housing Strategy

The planning proposal is strongly consistent with the objectives and strategic directions of the NSW Government's *Housing 2041: NSW Housing Strategy*, which establishes a long-term vision to deliver more homes, in the right locations, with greater diversity, affordability and resilience.

The proposal directly advances the four pillars of the Strategy—Supply, Diversity, Affordability and Resilience—through the delivery of approximately 202 additional dwellings within the South Nowra urban area. The proposal will increase housing supply in a strategically appropriate location adjoining existing urban development, employment lands, infrastructure and services. The need for additional housing is clearly demonstrated by ongoing housing affordability pressures throughout the Shoalhaven and extremely low residential vacancy rates within the Nowra area. The proposal will make a meaningful contribution towards increasing housing supply and addressing housing demand within the Nowra-Bomaderry growth area.

The proposal also supports the Strategy's objective of increasing housing diversity. A range of residential lot sizes are proposed, generally ranging from approximately 363m² to 895m², which will facilitate a variety of housing outcomes and provide opportunities for different household types, including first-home buyers, downsizers, smaller households and families. The visioned subdivision layout provides flexibility for future housing choice and responds to changing demographic trends and housing needs.



Housing 2041 recognises that increasing housing supply and encouraging a broader range of housing products are important mechanisms for improving housing affordability outcomes. Whilst the proposal does not in itself directly provide subsidised affordable housing, it will improve housing affordability by increasing the supply of residential land and facilitating smaller lot sizes than are typically available within traditional greenfield subdivisions. This reduces the underlying land component of housing costs and creates opportunities for more attainable housing outcomes within the local market. The proposal is also consistent with the Shoalhaven Affordable Housing Strategy 2024, which identifies a significant shortage of affordable and diverse housing throughout the Local Government Area and supports increased housing supply and housing diversity as key measures to address affordability challenges.

The proposal is also consistent with the Resilience pillar of Housing 2041. Detailed technical investigations have informed the site layout and development footprint, ensuring that environmental constraints, biodiversity values, bushfire risk, flooding, stormwater management and cultural heritage considerations have been appropriately addressed. Approximately 9.3 hectares of environmentally sensitive land is proposed to be protected through environmental conservation zoning, ensuring that housing delivery is balanced with long-term environmental outcomes. The site is located within the Nowra-Bomaderry growth area and represents a logical extension of the existing South Nowra urban area. It benefits from proximity to employment lands, community facilities, schools, retail centres and regional transport connections. The proposal therefore supports the growth of Nowra as the Shoalhaven's principal regional centre and aligns with the Strategy's objective of delivering housing in locations with access to jobs, services and infrastructure. The proposal will facilitate approximately 202 dwellings on 16.2 hectares of residential land, equating to a gross residential density of approximately 12.9 dwellings per hectare. This represents an efficient use of serviced urban land whilst maintaining a suburban residential character and protecting significant environmental areas.

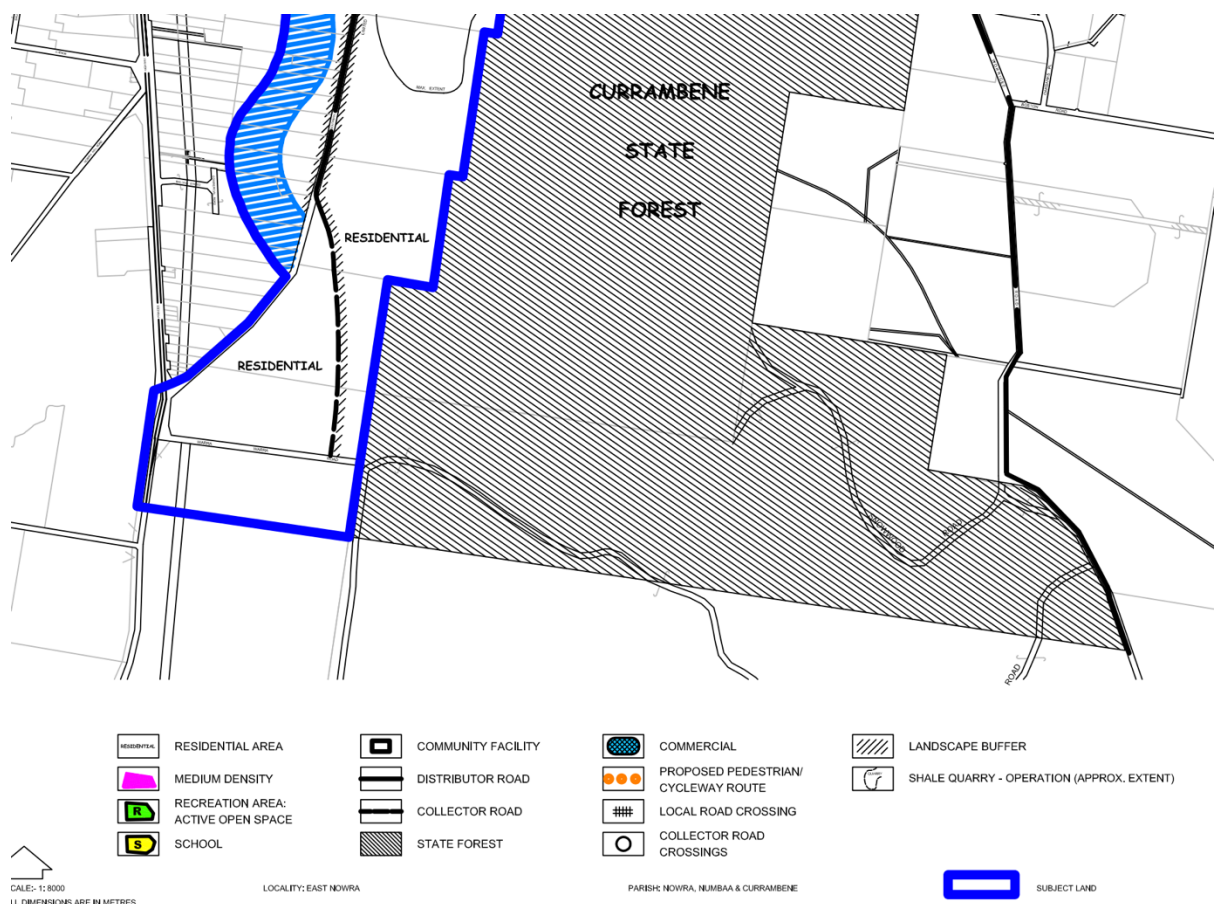
Accordingly, the proposal is considered to be strongly consistent with Housing 2041 by increasing housing supply, supporting housing diversity, improving housing



affordability outcomes, protecting environmental values and delivering housing in a well-located and serviced urban area.

Shoalhaven Development Control Plan 2014

Chapter N10 of the Shoalhaven Development Control Plan 2014 identifies the land for residential purposes.



CITY OF SHOALHAVEN DEVELOPMENT CONTROL PLAN 2014

The extent to which the proposal seeks to utilise part of the land for residential purposes, and for mixed use purposes is consistent with the Shoalhaven DCP 2014.



Draft Illawarra Shoalhaven Plan

The draft Illawarra Shoalhaven Plan was released by the NSW Department of Planning, Housing and Infrastructure for public exhibition in July 2026. The draft Plan is intended to replace the Illawarra Shoalhaven Regional Plan 2041 and establish the strategic land use framework for the region for the next 20 years.

At the time of preparation of this Planning Proposal, the draft Plan remains subject to the outcomes of public exhibition and has not replaced the current Regional Plan. It nevertheless represents an applicable exhibited draft regional strategic plan and has therefore been considered in detail as part of this Planning Proposal.

The draft Plan applies seven State land use priorities to the Illawarra Shoalhaven context. For the purposes of the Environmental Planning and Assessment Act 1979, the priorities operate as the Plan's objectives and the subsequent regional responses operate as its strategies. The seven priorities are Aboriginal Outcomes, Housed, Prosperous, Connected, Resilient, Liveable and Coordinated.

Aboriginal Outcomes

The Aboriginal Outcomes priority seeks to embed Aboriginal knowledge, Country and culture in planning, strengthen opportunities for Aboriginal economic self-determination and provide greater certainty for Aboriginal land planning. The draft Plan emphasises engagement with Traditional Owners, Aboriginal communities, registered Aboriginal organisations and Local Aboriginal Land Councils so that cultural knowledge can inform land use decisions.

The Planning Proposal has appropriately considered Aboriginal cultural heritage through the Aboriginal Cultural Heritage Assessment prepared by Apex Archaeology. The assessment was prepared in accordance with the applicable NSW Aboriginal cultural heritage assessment and consultation requirements and included consultation with Registered Aboriginal Parties. Eleven Aboriginal organisations and individuals registered as RAPs and were provided the opportunity to participate in the assessment process.



The archaeological investigation identified no Aboriginal objects, Aboriginal sites or areas of archaeological potential within the study area.

The proposal does not involve Aboriginal-owned land or seek to determine the future use of land subject to an Aboriginal land activation process. Nevertheless, the cultural heritage assessment process ensures that Aboriginal cultural values have been appropriately investigated and provides a framework for their protection as future planning and development progresses.

Housed

The Housed priority is directly relevant to the Planning Proposal. The draft Plan projects the regional population to exceed 677,000 people by 2046 and identifies the need for additional housing supply, affordability, diversity and accessibility. It expressly recognises inconsistent housing supply, infrastructure constraints and changing household needs as regional challenges.

Significantly, the draft Plan identifies Nowra-Bomaderry as one of the locations expected to accommodate a substantial proportion of the region's future housing. Approximately 38,000 new homes are anticipated in West Dapto and greenfield areas around Nowra-Bomaderry over the next 20 years.

The Planning Proposal gives direct effect to this priority by facilitating approximately 202 additional dwellings within South Nowra. The proposal is particularly consistent with the draft Plan's emphasis on locating housing within the identified urban growth area, contiguous with established urban development, close to employment and services, where infrastructure is existing or capable of being efficiently provided, and in a form that broadens housing diversity and affordability.

The proposed R1 General Residential land directly adjoins existing and approved residential development and represents a logical continuation of the South Nowra residential growth front.



The proposed minimum lot size framework also directly responds to the objective of increasing housing diversity. Rather than perpetuating the traditional 500m² minimum lot size prevalent throughout much of Nowra, the proposal provides a combination of 350m² and 400m² minimum lot sizes, with most lots expected to be approximately 450m². This will facilitate a greater variety of detached housing products and more attainable land parcels while achieving increased density through a planned subdivision pattern rather than relying on subsequent ad hoc dual occupancy development.

The draft Plan expressly identifies increasing overall housing supply as an important response to affordability pressures and recognises that greater flexibility in planning controls can facilitate broader dwelling types and densities in appropriate locations. The proposal is therefore strongly consistent with the Housed priority.

Prosperous

The Prosperous priority seeks to grow a resilient and innovative economy, support jobs growth, activate centres and maintain productive industrial lands.

The Planning Proposal recognises the importance of South Nowra as an employment location and does not seek the wholesale removal of employment land from the site. Instead, the proposal establishes a differentiated land-use pattern that reflects the physical and commercial characteristics of the land:

- approximately 6.7 hectares of E3 Productivity Support land is retained adjoining the Princes Highway;
- approximately 9.3 hectares is proposed to be zoned C2 Environmental Conservation, principally associated with Browns Creek, riparian and biodiversity values; and
- approximately 16.2 hectares on the eastern side is proposed to be zoned R1 General Residential.



The draft Plan recognises South Nowra's contribution to manufacturing and identifies the precinct as having long-term capacity for future industrial needs, while also acknowledging that environmental and infrastructure constraints require resolution. The Planning Proposal does not challenge that broader strategic role. Rather, it seeks to rationalise the edge of that employment area by retaining the portion of the subject land with the strongest locational characteristics for E3 activity and applying alternative zones to land that performs materially different functions.

The supporting Economic Assessment prepared by GapMaps establishes that at least 860 hectares of E3 and E4 zoned land exists within the Shoalhaven LGA, of which at least 307 hectares is undeveloped or underdeveloped. Based upon an assumed employment-land take-up rate of approximately 4–5 hectares per annum, this represents approximately 60–70 years of available E3/E4 land supply. The Economic Assessment further identifies that approximately 70% of the undeveloped E3/E4 supply within Shoalhaven is located in the broader South Nowra area.

The approximately 16.2 hectares proposed to be rezoned R1 therefore represents approximately 5.3% of the presently undeveloped E3/E4 land within the Shoalhaven and does not materially compromise the quantitative supply of employment land. At the regional scale, the draft Plan similarly identifies approximately 4,500 hectares of zoned industrial land, approximately 30% of which is undeveloped, and identifies sufficient regional industrial land supply for the next 10 years.

The eastern portion of the subject site has significantly less practical utility for E3 Productivity Support uses than the land retained adjacent to the Princes Highway. The eastern land has no direct highway frontage, has limited commercial exposure, is located behind the retained E3 land and Browns Creek corridor, adjoins existing and approved residential development, and has limited relationship to the freight and customer-facing functions for which the Princes Highway frontage is particularly advantageous.

The proposal seeks to retain the land having the strongest commercial and strategic employment characteristics rather than indiscriminately removing employment-



zoned land. Additional residential population will also support the broader Nowra economy by providing housing for workers, increasing expenditure in Nowra City Centre and existing commercial areas and increasing the labour pool available to businesses throughout South Nowra. The proposal is therefore capable of supporting the broader Prosperous priority, subject to the detailed assessment of industrial land policy provided later in this report.

Connected

The Connected priority seeks to link communities with efficient transport systems and improve access between homes, jobs and services. The draft Plan recognises that Shoalhaven currently has limited public transport options and high private vehicle dependence, while seeking improved public transport, active transport and better integration between transport planning and future urban growth.

The subject land is strategically positioned between established residential development, the South Nowra employment area and the broader Nowra urban area.

The future development of the land can provide opportunity for future pedestrian and cycling infrastructure to connect the residential precinct with adjoining residential areas, employment land and the wider urban network. Detailed active transport arrangements will appropriately be resolved through the subsequent subdivision development application. The proposal also locates new housing in close proximity to a major concentration of employment rather than establishing a remote residential release area requiring long-distance travel to employment. Accordingly, the proposal is consistent with the intent of the Connected priority.

Resilient

The Resilient priority recognises the significant exposure of the Illawarra Shoalhaven region to bushfire, flooding, storms, coastal hazards and urban heat and seeks to ensure that new urban development is safe and capable of adapting to climate change. The priority also places significant emphasis upon biodiversity conservation, waterways and ecological connectivity.



The Planning Proposal has been comprehensively investigated in relation to both natural hazards and environmental values. The submitted Flood Impact and Risk Assessment has been prepared using appropriate climate change scenarios, a 2100 planning horizon, and considers flood events through to the Probable Maximum Flood. The assessment demonstrates that future residential development can be appropriately designed and filled having regard to flood risk and that safe access and evacuation arrangements can be achieved.

Bushfire risk has similarly informed the concept subdivision, including access, asset protection and perimeter-road considerations.

Biodiversity considerations have resulted in a substantial reduction in the area proposed for urban development compared with earlier concepts. Approximately 9.3 hectares is now proposed to be zoned C2 Environmental Conservation, including Browns Creek and associated riparian land and a 50-metre-wide southern conservation corridor connecting Browns Creek toward the Worrigee Nature Reserve.

The proposal therefore responds strongly to the Resilient priority by concentrating development on the part of the site demonstrated to be capable of accommodating urban development while placing environmentally sensitive land into a conservation zone.

Liveable

The Liveable priority seeks to create inclusive, well-serviced and connected neighbourhoods with access to housing, employment, community facilities, open space and services. The draft Plan identifies Nowra as a major centre providing essential services and a hub for community life, including education, healthcare, retail and recreation.



The proposal is consistent with this objective. Future residents will have convenient access to the Nowra City Centre, the South Nowra employment area, schools and educational facilities, retail and commercial services, health and community facilities, and existing and future recreation opportunities.

The proposed lot-size structure also promotes a coherent and planned residential environment. Density is achieved through deliberate subdivision design rather than the widespread subsequent redevelopment of traditional 500m² lots for dual occupancies. This assists in creating a more predictable streetscape and provides greater opportunity for coordinated road design, street tree planting, pedestrian infrastructure and public-domain outcomes. The proposed C2 conservation corridor will also provide an important landscape and environmental element within the broader precinct, although it is not relied upon as public open space. The proposal is therefore consistent with the Liveable priority.

Coordinated

The Coordinated priority seeks to align land-use change with infrastructure, environmental protection, housing delivery and employment outcomes. It recognises that competing demands for finite urban land require coordinated decision-making and that growth should be focused in areas where infrastructure can be efficiently delivered.

The Planning Proposal has been informed by a comprehensive suite of technical investigations addressing water and wastewater servicing, stormwater and water quality, road infrastructure and traffic, flooding, bushfire, biodiversity, contamination, Aboriginal cultural heritage, environmental noise and employment land supply and demand. Concept civil engineering plans have also been prepared to demonstrate the practical servicing and development of the future residential precinct.

The land is not an isolated greenfield proposal remote from the existing urban area. It adjoins established and approved development and forms part of land already zoned for urban purposes. The proposal therefore makes use of the existing Nowra



urban structure and is capable of being integrated with existing and planned infrastructure. It also demonstrates a coordinated response to competing land-use objectives by retaining viable employment land, protecting environmental land and directing residential development to the part of the property adjoining the residential growth front. The Planning Proposal is therefore consistent with the Coordinated priority.

Relevant Regional Responses

The seven priorities are implemented through 10 regional responses. While not every response has a direct bearing on this Planning Proposal, each has been considered below.

Draft Plan Response	Assessment
Response 1 - Increase housing supply in the urban growth area	Strongly consistent. The proposal facilitates approximately 202 additional dwellings on existing urban-zoned land within South Nowra. The draft Plan states that feasible, well-located locations within the UGA should be prioritised, and establishes a long-term objective that 80% of new housing be located within the existing urban area.
Response 2 - Prioritise housing diversity and choice to meet changing household needs	Strongly consistent. The proposed 350m ² and 400m ² minimum lot size controls deliberately provide an alternative to the predominantly 500m ² + subdivision pattern found throughout Nowra. They facilitate smaller and more attainable lots and a wider range of housing outcomes. The draft Plan specifically identifies Nowra as a location where increased housing diversity should be investigated.
Response 3 - Align sequenced infrastructure delivery with growth priorities	Consistent. The proposal is supported by detailed infrastructure and concept civil investigations and is contiguous with the existing urban area. Required servicing and local infrastructure can be coordinated with future subdivision. The draft Plan recognises that growth within the UGA may proceed where infrastructure can reasonably and feasibly be upgraded.



Draft Plan Response	Assessment
Response 4 - Support a vibrant centres network	Consistent. The proposal reinforces Nowra's role as a major centre by increasing its residential catchment and providing additional residents within convenient proximity of jobs, retail, education, healthcare and other services.
Response 5 - Intensify and grow the region's industrial lands potential and capacity for future industries	The proposal retains the most strategically useful E3 land fronting the Princes Highway but seeks to rezone the less commercially useful eastern component. The Economic Assessment submitted demonstrates substantial remaining E3/E4 supply. The draft Plan identifies sufficient industrial land supply across the region for the next 10 years and states that planning controls should be reviewed for land best suited to future industry needs. A detailed assessment against Appendix F (State Wide Policy for Industrial Lands) follows.
Response 6 - Deliver Australia's first Urban Renewable Energy Zone	Nothing within the proposal prevents future incorporation of rooftop solar, battery storage, electric vehicle infrastructure or other distributed renewable-energy measures within the residential precinct.
Response 7 - Unlock the productivity, economic and lifestyle benefits between the region and south west Sydney	Consistent. The response recognises increasing pressure to maximise housing within the Urban Growth Area (UGA) while maintaining industrial capacity. The proposal provides additional housing within the UGA while retaining strategically useful employment land.
Response 8 - Define appropriate land use pathways to support Aboriginal outcomes	Not directly applicable. The proposal is not an Aboriginal land activation proposal. Aboriginal cultural heritage has nevertheless been comprehensively considered through the ACHA and RAP consultation process.
Response 9 - Protect the region's natural places so both people and nature can thrive as the climate changes	Strongly consistent. Approximately 9.3 hectares will be zoned C2 Environmental Conservation, including Browns Creek and ecological connectivity land. Flooding and bushfire have been assessed having regard to future climate conditions, and the BCAR is being reviewed by DCCEEW.



Draft Plan Response	Assessment
Response 10 - Connect and grow the network of regional public open space and events infrastructure	Not directly applicable. The proposal does not prejudice the delivery of the regional open-space network. Future subdivision design will provide opportunities for active-transport and local open-space connections.

Appendix A - Local Government Narratives - Shoalhaven

Appendix A to the draft Plan provides specific strategic guidance for each Local Government Area. The Shoalhaven narrative is particularly relevant to this Planning Proposal.

The narrative identifies a resident population increasing from approximately 119,622 in 2026 to 163,418 in 2046, approximately 49,200 existing jobs, manufacturing and production, health and business services as primary employment sectors, and Nowra-Bomaderry as the principal contemporary residential and employment centre within the LGA. The narrative recognises both the need to accommodate substantial housing growth and the economic role of South Nowra.

Shoalhaven Statewide Priorities

Aboriginal Outcomes

The Shoalhaven narrative seeks improved relationships with Aboriginal communities, greater use of co-design and protection of Aboriginal cultural heritage. As discussed previously, the proposal has been subject to a comprehensive Aboriginal Cultural Heritage Assessment and RAP consultation process. Appropriate mechanisms are established to protect Aboriginal cultural heritage should previously unidentified material be encountered.

Housing

The Shoalhaven narrative specifically calls for increased housing completions, an appropriate balance between greenfield and well-located infill development,



increased housing diversity, smaller dwellings and adaptable housing, and improved affordable-housing outcomes. The Planning Proposal directly advances these objectives. The proposed 202-lot residential precinct provides additional housing adjoining the existing South Nowra residential area and includes minimum lot sizes materially smaller than the traditional 500m² lot pattern common throughout Nowra.

Prosperous

The Shoalhaven narrative seeks to resolve planning, biodiversity and infrastructure constraints affecting regionally significant industrial land at South Nowra and to provide additional industrial land in locations suited to advanced manufacturing, health, defence and knowledge-based industries. The Planning Proposal does not impede the ongoing operation or expansion of the core South Nowra employment area. The proposal retains highway-facing E3 land and seeks to remove from the employment-land supply only that eastern land demonstrated to have inferior industrial and commercial characteristics. This matter is addressed in detail against Appendix F below.

Connected

The narrative identifies the need to address Shoalhaven's reliance on private motor vehicles, single-access roads and broader connectivity limitations. The proposal provides an improved road framework, multiple access opportunities and the capacity to incorporate pedestrian and cycle infrastructure as detailed subdivision design proceeds.

Resilient

The Shoalhaven narrative places particular emphasis upon bushfire, flooding and environmental constraints and recognises that approximately 70% of the LGA is protected or constrained. This makes efficient use of suitable land within the existing urban area particularly important. The proposal has been subject to detailed flood, bushfire, biodiversity and contamination assessment. Constrained



environmental land is proposed to be conserved rather than incorporated into the residential development footprint.

Liveable

The proposal will establish additional housing close to Nowra, South Nowra employment areas, health, education, shopping and community infrastructure and is consistent with the narrative's objective of establishing vibrant, inclusive and healthy communities.

Coordinated

The proposal is supported by detailed technical and infrastructure assessment and makes use of existing urban land adjoining established residential areas. This is consistent with the narrative's objective of concentrating development in priority areas capable of accessing established centres and infrastructure.

Shoalhaven Jobs Guidance

The Shoalhaven narrative establishes an aspirational increase in employment from approximately 49,200 jobs to approximately 75,450 jobs over the next 20 years. It identifies South Nowra as regionally significant industrial land, with approximately 2,934 existing jobs and a 2046 aspiration of approximately 4,676 jobs, an increase of approximately 1,742 jobs.

This employment objective is acknowledged. The Planning Proposal does not seek to constrain the South Nowra employment precinct or remove its most strategically useful employment land. Instead, 6.7 hectares of E3 land is retained on the Princes Highway frontage, the proposed C2 corridor provides separation between future residential development and retained employment uses, and only the eastern land with limited exposure and weaker industrial characteristics is proposed for residential development.



The accompanying Economic Assessment demonstrates substantial undeveloped E3 and E4 capacity within the Shoalhaven and concludes that removal of the proposed R1 land will not compromise the LGA's future employment-land requirements. Further, the additional residential population will provide housing for the workforce required to support the substantial employment growth anticipated by the narrative. Housing supply and employment growth should therefore not be viewed as mutually exclusive objectives. Providing additional housing close to the South Nowra employment precinct supports the ability of the wider economy to attract and retain workers.

Shoalhaven Housing Guidance

The Housing Guidance contained in Appendix A is particularly supportive of this proposal. It confirms that Shoalhaven has a Housing Accord target of 4,900 new homes by mid-2029 and, importantly, identifies that there are not enough homes forecast for delivery to meet the short-to-medium term requirement. The narrative specifically identifies Nowra, Bomaderry and Milton-Ulladulla as priority areas for additional housing, alongside the greenfield location at Moss Vale Road North.

The subject proposal is capable of delivering approximately 202 additional dwellings within the Nowra urban area and therefore provides a direct and tangible response to the shortfall identified by the draft Plan. This is a particularly important strategic consideration when balanced against the relatively small reduction in the very substantial supply of undeveloped E3/E4 land identified in the Economic Assessment.

Draft Industrial Land Mapping

Figure 4 of Appendix A currently identifies industrial land within South Nowra as regionally significant. The subject land is understood to fall within this exhibited categorisation.



The exhibited mapping is nevertheless draft and remains subject to validation, stakeholder feedback and refinement before finalisation. The Planning Proposal therefore acknowledges the exhibited categorisation but submits that a more refined assessment of the subject holding is warranted before the Regional Plan and industrial-land mapping are finalised. The western, central and eastern components of the holding perform materially different functions and should not automatically be treated as a single homogenous industrial precinct.

Appendix B - Urban Growth Area Policy

The Urban Growth Area Policy establishes the spatial framework within which future housing and employment growth is to occur. The purpose of the UGA is to accommodate housing and jobs, address cumulative undersupply and provide additional capacity for potentially higher population growth, while aligning infrastructure investment and directing development away from high environmental value and hazard-constrained land.

Of particular importance, the Policy expressly includes E3 Productivity Support land within the existing urban area. Accordingly, the Planning Proposal does not seek to bring rural or non-urban land into the urban footprint. The land is already urban zoned and forms part of the existing urban area for the purposes of the draft Regional Plan.

The Policy also expressly recognises land progressing through active planning proposals and statutory processes for land-use change as part of the UGA framework. It anticipates that the appropriate zoned development footprint of those lands will be refined through the rezoning process. That is precisely what has occurred through this Planning Proposal.

The original concept has been progressively refined following environmental, engineering, economic and land-use investigations, resulting in retention of appropriate E3 land, a considerably expanded C2 conservation area, and concentration of residential development within the eastern portion of the holding.



Assessment Against Urban Growth Criteria

Urban Growth Criterion	Assessment
Policy	Consistent. The proposal occurs within the existing urban area, is contiguous with existing residential development and responds to the housing, environmental, infrastructure and economic outcomes sought by the draft Plan. It does not involve leapfrog expansion of the urban footprint.
Demonstrated Need	Strongly demonstrated. Appendix A confirms that Shoalhaven does not presently have enough homes forecast to meet its short-to-medium term housing need and identifies Nowra/Bomaderry as a priority housing area. The proposal also provides a different lot-size and price-point product from much existing Nowra housing.
Deliverability	Demonstrated. A concept subdivision for approximately 202 lots has been prepared and tested through civil engineering, servicing, flood, traffic, bushfire, biodiversity, contamination, acoustic and cultural heritage investigations.
Infrastructure	Consistent. The site adjoins established urban areas and can be connected to existing urban infrastructure. Detailed servicing and civil investigations accompany the proposal. Required infrastructure can be progressively delivered with future subdivision.
Environmental and heritage	Consistent. The development footprint has been refined to avoid and protect significant environmental land. Approximately 9.3 hectares is proposed to be C2. A BCAR and ACHA have been prepared, with the BCAR presently subject to direct DCCEEW engagement.
Avoiding risk	Consistent. Flood, climate change, bushfire and contamination risks have been specifically investigated. The revised FIRA includes the 2100 SSP3-7.0 climate change scenario and the full suite of relevant flood events.
Land-use conflict	Consistent. The proposal provides a substantial C2 conservation corridor separating much of the proposed residential land from



Urban Growth Criterion	Assessment
	retained E3 land. Noise, rifle-range operations and other interface issues have been investigated.
Aboriginal land	This criterion is not directly applicable because the proposal does not concern land being advanced through an Aboriginal Community Land and Business Plan. Aboriginal cultural heritage has nevertheless been comprehensively assessed.

The Urban Growth Criteria require growth to be contiguous with the existing urban area, appropriately serviced, environmentally responsible and capable of managing natural hazards and incompatible adjoining land uses. The Planning Proposal satisfies these characteristics. The Urban Growth Area Policy therefore provides considerable strategic support for the location of the proposed residential development.

Appendix F - Statewide Policy for Industrial Lands

The Statewide Policy for Industrial Lands was finalised in August 2026 as Appendix F to the State Land Use Plan. The Policy establishes three categories of industrial land: State significant, regionally significant and locally significant.

The classification is based upon five principles concerning strategic infrastructure, strategic network importance, economic and employment contribution, scale/supply and demand, and other matters of strategic importance. Industrial precincts need only satisfy one applicable principle to attain State or regional significance. The Policy recognises that different industrial areas perform different functions and therefore require tailored planning responses, including appropriate alternative uses where strategically justified and assessed against the Policy criteria.

Application to the Subject Land

The existing E3 Productivity Support zoning means that the Policy applies to the subject land. The exhibited Shoalhaven LGA mapping currently categorises the subject land as part of the regionally significant South Nowra industrial land.



Appendix F provides strong protection to regionally significant industrial land and states that such land should generally be retained for industrial purposes. In particular, residential use is not supported while land remains categorised as regionally significant industrial land.

The Planning Proposal provides a substantial site-specific evidence base demonstrating why the exhibited categorisation should be refined in its application to this particular holding. The proposal should therefore be understood not as an attempt to introduce residential development into land that must permanently remain regionally significant industrial land, but as a statutory planning process examining whether part of the existing industrial-zoned holding continues to warrant that strategic categorisation.

This approach is expressly contemplated by Appendix F. Section 3.5 recognises that industrial areas and strategic priorities may change over time and allows industrial land categorisation to be reviewed and updated. It also specifically acknowledges that planning proposals may demonstrate a shift in land-use demand or strategic priorities, and that land subject to an alternate planning pathway may ultimately be rezoned, following which its categorisation is updated.

Site-Specific Application of the Policy Principles

The subject holding should not be treated as functionally homogenous. The characteristics of the western and eastern portions are materially different.

Strategic Infrastructure

The retained western E3 land has a direct relationship with the Princes Highway and has the strongest connection to the transport and service infrastructure relevant to E3 Productivity Support activities. The eastern land proposed to be rezoned R1 does not share those characteristics to the same degree. It lacks direct Princes



Highway frontage and exposure and is physically removed from the highway by the retained E3 land and Browns Creek corridor.

Strategic Network Importance

The eastern R1 land does not perform a demonstrated freight, logistics or strategic network function. The proposal does not remove or compromise a strategic freight corridor or prevent the broader South Nowra employment precinct from accessing the Princes Highway and regional transport network.

Economic and Employment Contribution

The subject site's existing employment contribution is limited. The land proposed for R1 development is currently undeveloped and does not accommodate a significant concentration of industrial employment. Conversely, the retained 6.7 hectares of highway-facing E3 land preserves the part of the holding having the strongest potential future employment contribution.

Scale, Supply and Demand

The Economic Assessment demonstrates a very substantial supply of undeveloped E3 and E4 land. At least 307 hectares of E3/E4 land is undeveloped or underdeveloped within the Shoalhaven, equivalent to approximately 60–70 years of supply based upon an assumed take-up rate of 4–5 hectares per annum. The 16.2 hectares proposed to be zoned R1 represents approximately 5.3% of this undeveloped supply. At the regional scale, the draft Regional Plan similarly identifies approximately 30% of some 4,500 hectares of industrial land as undeveloped and identifies sufficient industrial land supply for the next 10 years. The proposal therefore does not create an industrial-land shortage.

Strategic Importance

South Nowra unquestionably performs an important employment role. The proposal does not undermine that role. Instead, it retains the strategically useful highway-facing E3 land while providing a more logical urban interface between employment



land, environmental land and existing residential development. The proposal also directly supports another major State strategic priority by facilitating approximately 202 additional homes in a location expressly identified as a housing priority area and where the draft Regional Plan identifies a shortfall in near-term housing delivery.

Assessment Against Alternative Use Considerations

Although Appendix F states that residential use is not supported while land remains regionally significant, the Technical Note's site-specific considerations provide a useful framework for examining whether the current exhibited categorisation appropriately reflects the eastern part of the site.

Consideration 1 - Strategic Alignment

The proposed residential use has strong alignment with broader State, regional and local housing policy. The land lies within the UGA, adjoins existing residential development and is located at Nowra, which Appendix A specifically identifies as a priority location for additional housing. There is therefore a clear strategic planning basis for considering an alternative future land use.

Consideration 2 - Alignment with Existing Zone Objectives

Residential development is not the intended primary use of the existing E3 zone. For this reason, the proposal seeks a change of zone rather than attempting to rely upon an additional permitted use or other site-specific mechanism. The Planning Proposal is the appropriate statutory mechanism through which the future zoning of the land can be considered.

Consideration 3 - Supply and Demand

Technical Note 2 requires consideration of industrial land supply at both macro and site-specific levels and expressly recognises that where supply is sufficient or suitably located alternatives exist, an alternative proposal may progress. It also



recognises that an alternative may be justified where a site has limited industrial utility because of its characteristics or constraints.

The GapMaps assessment directly addresses this consideration. There is at least 307 hectares of undeveloped or underdeveloped E3/E4 land within the Shoalhaven, approximately 70% of which is located within South Nowra. At a micro level, the eastern part of this particular site lacks the highway exposure and commercial characteristics of the retained western land. This strongly supports reconsideration of the eastern component.

Consideration 4 - Economic Contribution and Proximity

The land proposed for residential development does not currently accommodate a substantial industrial employer, significant supply-chain activity or strategic freight infrastructure. Its current direct employment contribution is negligible. The highway-facing land with the greatest opportunity to generate future employment is retained in the E3 zone.

Consideration 5 - Utility and Connectivity

Technical Note 2 requires consideration of lot characteristics, freight access, adjacency to industrial lands and the site's practical function within the wider industrial network. It recognises that a site which is isolated, constrained or unviable for future industrial development may be suitable for transition.

The eastern land is separated from the Princes Highway, lacks meaningful highway exposure, adjoins residential development and is separated from much of the retained E3 land by the Browns Creek environmental corridor. These characteristics materially diminish its practical utility compared with other E3/E4 land within South Nowra.

Consideration 6 - Impact on Adjoining Industrial Land



The Planning Proposal has been deliberately configured to minimise impacts upon retained employment land. The proposed C2 corridor provides substantial physical separation between the proposed residential precinct and the retained E3 land. Noise and land-use compatibility have also been specifically investigated. There is no evidence that the proposed R1 zoning would prevent the continuing operation or future development of the broader South Nowra industrial area. This approach responds directly to Technical Note 2, which requires buffers and transition measures where necessary to prevent alternative uses compromising adjoining industrial activity.

Industrial Land Categorisation and the Planning Proposal Process

The current regionally significant designation is an important consideration, but it should not be treated as preventing the Planning Proposal from being considered on its merits. Appendix F states that planning proposals continue to follow their statutory process notwithstanding industrial-land categorisation.

Appendix F also expressly recognises that industrial land categorisation may change, councils may identify land for recategorisation, planning proposals may provide evidence of changing land-use demand or strategic priorities, land may continue through another statutory planning pathway while its existing categorisation remains in place, and where a subsequent decision is made to rezone land, the industrial-land categorisation is then updated through the applicable review process.

The Planning Proposal and supporting Economic Assessment provide the evidence necessary to reconsider whether the entire existing E3 holding should remain included within the regionally significant industrial-land boundary.

The exhibited categorisation should therefore be refined to:

- retain regionally significant industrial status over the E3 land proposed to remain adjacent to the Princes Highway;



- recognise the Browns Creek and biodiversity corridor as environmental conservation land; and
- remove the eastern R1 component from the industrial-land categorisation if the proposed rezoning is supported.

This would result in the industrial-land mapping better reflecting the actual long-term land-use structure and function of the site.

Overall Assessment of the Draft Strategic Framework

The emerging strategic planning framework presents both a significant opportunity and a policy issue for the Planning Proposal.

On one hand, the draft Regional Plan and its Shoalhaven-specific housing guidance provide stronger support for the proposed residential component than existed when the Planning Proposal was originally prepared. The draft framework identifies a near-term housing supply shortfall within Shoalhaven, identifies Nowra and Bomaderry as priority areas for additional housing, seeks substantially greater housing diversity, encourages feasible housing within the existing urban area, includes E3 land within the defined urban area, recognises active planning proposals as part of the process for determining appropriate future urban land-use footprints, seeks development contiguous with established urban areas, and encourages growth where infrastructure and environmental constraints can be appropriately resolved.

On the other hand, the exhibited industrial-land mapping currently identifies the subject land as regionally significant and Appendix F establishes a strong default position against residential development on such land. The Planning Proposal acknowledges this tension.

The appropriate response is not to disregard the emerging industrial-land policy, nor is it to assume that the exhibited mapping is immutable. The exhibited mapping remains subject to validation and refinement, and Appendix F establishes



mechanisms through which industrial-land categorisation may be reconsidered in response to strategic evidence and statutory planning processes.

The substantial evidence accompanying this Planning Proposal demonstrates that:

- the 16.2 hectares proposed for R1 represents only a minor proportion of available undeveloped employment land;
- substantial alternative E3/E4 capacity exists within South Nowra and the wider Shoalhaven;
- the most strategically useful component of the subject employment land is retained;
- the eastern land has materially weaker industrial characteristics;
- the proposal does not compromise the core South Nowra employment precinct;
- the environmental corridor creates an appropriate and durable transition between uses;
- approximately 202 additional homes can be delivered in an identified housing priority area; and
- the proposal has been comprehensively tested against infrastructure, flooding, bushfire, biodiversity, cultural heritage, contamination, noise and traffic considerations.

Accordingly, the Planning Proposal is considered to have strong strategic merit when the draft strategic framework is considered as a whole. The appropriate outcome is for the exhibited industrial-land categorisation to be refined to reflect the site-specific evidence and proposed long-term land-use structure, rather than for the draft categorisation to prevent further consideration of an otherwise strategically justified Planning Proposal.

Is the planning proposal consistent with applicable State Environmental Planning Policies?



Consistency with applicable SEPPs is addressed in **Table 4** below.

Table 4: Consistency with applicable SEPPs

SEPP	Justification
Industry and Employment	The proposal is not directly impacted upon by the operation of State Environmental Planning Policy (Industry and Employment).
Biodiversity and Conservation	The submitted BCAR report demonstrates consistency with State Environmental Planning Policy (Biodiversity and Conservation).
Housing	The proposed R1 General Residential zone permits diverse housing. The proposal does not preclude development for affordable housing. This proposal does not contain any provisions that are contrary to this SEPP.
Resilience and Hazards	The site is not affected by any coastal management provisions of this SEPP. The proposal is supported by Preliminary Site Investigation (PSI) and Geotechnical reports which suitably addresses chapter 4 – Remediation of land.
Transport and Infrastructure	No aspect of this SEPP impacts on the aims or intended outcomes of this Planning Proposal.

Is the planning proposal consistent with applicable Ministerial Directions (s.9.1 directions)?

Consistency with applicable ministerial directions is addressed in **Table 5** below.

Table 5: Consistency with applicable Section 9.1 Directions

Consistency with relevant section 9.1 Directions by the Minister for Planning
Focus Area 1: Planning Systems
1.1 Implementation of Regional Plans
Application: This direction applies to land to which a Regional Plan has been released by the Minister for Planning.
Objective: The objective of this direction is to give legal effect to the vision, land use strategy, goals, directions and actions contained in Regional Plans.
Consistency: The planning proposal is consistent with Ministerial Direction 1.1 – Implementation of Regional Plans. In this instance, the relevant strategic document is the Illawarra Shoalhaven Regional Plan 2041. The planning proposal has been prepared having regard to the Illawarra Shoalhaven Regional Plan 2041 and is consistent with the vision and strategic directions of the Plan. In particular, the proposal: Facilitates the delivery of additional housing within the Nowra-Bomaderry urban area, contributing to regional housing supply and housing diversity objectives.



- Promotes efficient use of serviced urban land by directing residential growth to land adjoining established residential neighbourhoods and existing infrastructure.
- Retains environmentally significant land associated with Browns Creek through the application of environmental conservation zoning and associated protection measures.
- Retains the most commercially viable employment lands within the South Nowra Employment Precinct while addressing an existing land use interface conflict between industrial and residential development.
- Supports a more sustainable and compact urban form by locating future housing within proximity to existing services, employment opportunities and transport infrastructure.

The proposal therefore achieves the intent of the Illawarra Shoalhaven Regional Plan 2041 and supports the delivery of its housing, employment, environmental and infrastructure objectives.

Accordingly, the planning proposal is consistent with Ministerial Direction 1.1.

1.3 Approval and Referral Requirements

Application: This Direction provides that a LEP shall minimise the inclusion of provisions that require the concurrence, consultation or referral of development applications to a Minister or Public Authority, not contain these provisions unless Council has obtained approval from the relevant Authority and not identify development as designated development unless certain prerequisites can be met.

Objective: The objective of this direction is to ensure that LEP provisions encourage the efficient and appropriate assessment of development.

Consistency: This PP does not include provisions that require the concurrence, consultation or referral of development applications to a Minister or public authority.

1.4 Site Specific Provisions

Application: A LEP that amends another environmental planning instrument in order to allow a particular development proposal shall either allow that land use to be carried out in the zone that the land is situated on or rezone the site to an existing zone already applying in the environmental planning instrument that allows that land use without imposing any development standards or requirements in addition to those already existing or allow that land use on the relevant land without imposing any development standards or requirements in addition to those already contained in the principal planning instrument being amended.

Objective: The objective of this direction is to discourage unnecessarily restrictive site-specific planning controls.

Consistency: There is no reason for any site-specific planning controls to be applied to the subject site.

Focus Area 3: Biodiversity and Conservation

3.2 Heritage Conservation

Application: A planning proposal must contain provisions that facilitate the conservation of items, places, buildings, works, relics, moveable objects or precincts of environmental heritage significance to an area. Including the protection of Aboriginal objects and Aboriginal places that are protected under the National Parks and Wildlife Act 1974 (NSW).

Objective: The objective of this direction is to conserve items, areas, objects and places of environmental heritage significance and Indigenous heritage significance.

Consistency: The subject site does not contain, nor is it located adjacent to, any heritage items, heritage conservation areas or archaeological sites identified under Shoalhaven Local Environmental Plan 2014. Accordingly, the proposal will not adversely affect any known items or places of environmental heritage significance.

An Aboriginal Cultural Heritage Assessment (ACHA) has been prepared to assess the Aboriginal cultural heritage values of the site. The assessment included consultation with Registered Aboriginal Parties (RAPs) and archaeological investigations undertaken in accordance with Heritage NSW requirements. The assessment identified no Aboriginal objects, Aboriginal places or areas of



archaeological potential within the site and concluded that no further archaeological assessment or Aboriginal Heritage Impact Permit is required.

The ACHA recommends the implementation of unexpected finds procedures to ensure that any previously unidentified Aboriginal objects or human remains encountered during future works are appropriately managed.

Accordingly, the planning proposal has appropriately identified and considered environmental and Aboriginal cultural heritage values and will not adversely affect any known heritage items, places or objects.

The proposal is therefore consistent with Ministerial Direction 3.2 – Heritage Conservation.

Focus area 4: Resilience and Hazards

4.1 Flooding

Application: This direction applies to all relevant planning authorities that are responsible for flood prone land when preparing a planning proposal that creates, removes or alters a zone or a provision that affects flood prone land.

Objective: The objectives of this direction are to:

- (a) ensure that development of flood prone land is consistent with the NSW Government's Flood Prone Land Policy and the principles of the Floodplain Development Manual 2005, and
- (b) ensure that the provisions of an LEP that apply to flood prone land are commensurate with flood behaviour and includes consideration of the potential flood impacts both on and off the subject land.

Consistency: A Flood Impact and Risk Assessment has been prepared to assess existing flood behaviour and the suitability of the site for future urban development. The assessment includes modelling of the 1% AEP flood event, Probable Maximum Flood event and climate change scenarios, and identifies the extent of flood affected land within and surrounding the site.

The proposal has been designed having regard to the findings of the flood assessment. Areas associated with Browns Creek and the most significant flood constraints are proposed to be retained within environmental conservation land, while future urban development is directed to areas capable of accommodating residential development subject to detailed design and flood management measures.

The Flood Impact and Risk Assessment concludes that flood risks can be appropriately managed through future subdivision and development design and that the proposal will not result in unacceptable impacts on flood behaviour, flood storage, flood conveyance or flood levels on surrounding land. The proposal also incorporates stormwater management measures and climate change considerations to ensure long-term resilience.

Accordingly, the planning proposal has been informed by detailed flood investigations and is consistent with Ministerial Direction 4.1 – Flooding.

4.3 Planning for Bushfire Protection

Application: This direction applies to all local government areas when a relevant planning authority prepares a planning proposal that will affect, or is in proximity to, land mapped as bushfire prone land.

Objective: The objectives of this direction are:

- (a) protect life, property and the environment for bushfire hazards, by discouraging the establishment of incompatible land uses in bushfire prone areas, and encourage sound management of bushfire prone areas.

Consistency: The planning proposal is consistent with Ministerial Direction 4.3 – Planning for Bushfire Protection.



A Strategic Bushfire Assessment has been prepared to assess bushfire risk and inform the design of the proposal. The assessment identifies bushfire hazards affecting the site and demonstrates that future development can be designed to achieve compliance with the requirements of Planning for Bush Fire Protection 2019.

The proposed subdivision layout incorporates perimeter roads, Asset Protection Zones (APZs), suitable access arrangements and defensible space between future residential development and surrounding bushfire prone vegetation. The proposal has also been designed to avoid dwellings directly backing onto high-risk bushfire hazard areas and to provide safe access and egress for future residents.

The Strategic Bushfire Assessment concludes that bushfire risks can be appropriately managed through the proposed planning framework and subsequent detailed design stages.

Accordingly, the proposal is capable of achieving the objectives of Planning for Bush Fire Protection and is consistent with Ministerial Direction 4.3 – Planning for Bushfire Protection.

4.4 Remediation of Contaminated Land

Application: This direction applies when a planning proposal authority prepares a planning proposal that applies to:

- (a) land that is within an investigation area within the meaning of the Contaminated Land Management Act 1997,
- (b) land on which development for a purpose referred to in Table 1 to the contaminated land planning guidelines is being, or is known to have been, carried out,
- (c) the extent to which it is proposed to carry out development on it for residential, educational, recreational or childcare purposes, or for the purposes of a hospital – land:
 - i. in relation to which there is no knowledge (or incomplete knowledge) as to whether development for a purpose referred to in Table 1 to the contaminated land planning guidelines has been carried out, and
 - ii. on which it would have been lawful to carry out such development during any period in respect of which there is no knowledge (or incomplete knowledge).

Objective: The objective of this direction is to reduce the risk of harm to human health and the environment by ensuring that contamination and remediation are considered by planning proposal authorities.

Consistency: A Preliminary Site Investigation (PSI) has been prepared by Terra Insight in accordance with the requirements of Chapter 4 of State Environmental Planning Policy (Resilience and Hazards) 2021 to assess whether the site is suitable for the proposed residential land use.

The PSI included a detailed review of historical land uses, a site inspection and targeted soil sampling. While the investigation identified potential contamination sources associated with historical fly tipping, recreational vehicle activity and isolated burning of waste materials, laboratory testing generally found contaminant concentrations below the relevant investigation criteria and no asbestos was detected within the tested samples.

The PSI concludes that the site is suitable for the proposed residential development, subject to implementation of the recommendations contained within the report, including preparation of a Construction Environmental Management Plan and management of imported fill materials. The report further concludes that the requirements of Chapter 4 of the Resilience and Hazards SEPP have been satisfied and that Shoalhaven City Council may be satisfied that the site is suitable for the purpose for which the development is proposed to be carried out.

Accordingly, the planning proposal is consistent with Ministerial Direction 4.4 – Remediation of Contaminated Land.

4.5 Acid Sulfate Soils

Application: This direction applies to all relevant planning authorities that are responsible for land having a probability of containing acid sulfate soils when preparing a planning proposal that will apply to land having a probability of containing acid sulfate soils as shown on the Acid Sulfate Soils Planning Maps held by the Department of Planning and Environment.



Objective: The objective of this direction is to avoid significant adverse environmental impacts from the use of land that has a probability of containing acid sulfate soils.
Consistency: The subject site is identified as Class 5 Acid Sulfate Soils under the applicable acid sulfate soils mapping. Class 5 land represents the lowest category of mapped acid sulfate soil risk and generally indicates a low probability of occurrence. No Class 1, 2, 3 or 4 acid sulfate soils are mapped on the site and the nearest mapped higher-risk acid sulfate soils are located approximately 2.35 kilometres from the site. The Preliminary Site Investigation also notes that the Atlas of Australian Acid Sulfate Soils identifies the site as having an extremely low probability of acid sulfate soil occurrence. Accordingly, the proposal is unlikely to result in the disturbance of acid sulfate soils or generate adverse environmental impacts associated with acid sulfate soil disturbance. The planning proposal therefore gives effect to the objective of Ministerial Direction 4.5 and is consistent with the direction.
Focus area 5: Transport and Infrastructure
5.1 Integrating Land Use and Transport
Application: This direction applies to all relevant planning authorities when preparing a planning proposal that will create, alter or remove a zone or a provision relating to urban land, including land zoned for residential, employment, village or tourist purposes.
Objective: The objective of this direction is to ensure that urban structures, building forms, land use locations, development designs, subdivision and street layouts achieve the following planning objectives: (a) improving access to housing, jobs and services by walking, cycling and public transport, and (b) increasing the choice of available transport and reducing dependence on cars, and (c) reducing travel demand including the number of trips generated by development and the distances travelled, especially by car, and (d) supporting the efficient and viable operation of public transport services, and (e) providing for the efficient movement of freight.
Consistency: A Traffic Impact Assessment has been prepared to assess the transport implications of the proposal. The assessment demonstrates that the site is well connected to the existing South Nowra road network via Old Southern Road and is located in proximity to existing residential neighbourhoods, employment lands, community facilities and public transport services. The Traffic Impact Assessment concludes that the surrounding road network has sufficient capacity to accommodate the proposal and that future development can be serviced by a compliant internal road network designed in accordance with Shoalhaven Development Control Plan 2014 requirements. Existing bus services operate within the locality and opportunities exist for future extension of public transport services as residential development expands within South Nowra. By locating additional housing within an existing urban area close to employment opportunities, services and established transport infrastructure, the proposal promotes an integrated land use and transport outcome and reduces the need for expansion into more remote greenfield locations. Accordingly, the planning proposal is consistent with Ministerial Direction 5.1 – Integrating Land Use and Transport.
5.4 Shooting Ranges
Application: This direction applies to all relevant planning authorities when preparing a planning proposal that will affect, create, alter or remove a zone or a provision relating to land adjacent to and/ or adjoining an existing shooting range.



Objective: The objectives are to:

- (a) maintain appropriate levels of public safety and amenity when rezoning land adjacent to an existing shooting range,
- (b) reduce land use conflict arising between existing shooting ranges and rezoning of adjacent land,
- (c) identify issues that must be addressed when giving consideration to rezoning land adjacent to an existing shooting range.

Consistency: The proposal has been prepared having regard to the objectives of Local Planning Direction 5.4 – Shooting Ranges.

The subject land adjoins the existing Nowra Rifle Range and accordingly detailed investigations have been undertaken to assess potential safety and amenity impacts associated with the continued operation of the range.

GHD Pty Ltd prepared a *Nowra Rifle Range Operational Impact Assessment* which assessed the relationship between the future residential development and the existing rifle range. The assessment reviewed the range standing orders, applicable Range Danger Area Safety Traces (RDAST) and relevant planning requirements associated with shooting ranges. The assessment concluded that none of the existing Range Danger Area Safety Traces overlap or encroach upon the proposed development area and that the proposed rezoning does not introduce new risk receptors within any area subject to ballistic risk from lawful range operations. The assessment further concluded that the development can proceed without imposing additional safety controls, operational restrictions or modification requirements on the existing rifle range.

A Noise Impact Assessment prepared by Rodney Stevens Acoustics assessed the potential noise impacts associated with the ongoing operation of the Nowra Rifle Range. The assessment confirmed that shooting noise from the range can be appropriately managed through the implementation of recommended acoustic treatments and building design measures for future dwellings. The report concludes that suitable mitigation measures are available to minimise noise impacts on future residents whilst allowing the rifle range to continue operating.

Importantly, the proposal recognises the existing lawful operation of the Nowra Rifle Range and has been designed having regard to its continued operation. The supporting assessments demonstrate that the proposal will not compromise public safety, will not result in unacceptable land use conflict and will not adversely affect the ongoing operation of the range.

Accordingly, the proposal is consistent with the objectives of Local Planning Direction 5.4 – Shooting Ranges.

Focus area 6: Housing

6.1 Residential Zones

Application: This direction applies to all relevant authorities when preparing a PP that will affect land within an existing or proposed residential zone (including the alteration of any existing residential zone boundary), or any other zone in which significant residential development is permitted or proposed to be permitted.

Objective: The objectives of this direction are to:

- (a) encourage a variety and choice of housing types to provide for existing and future housing needs,
- (b) make efficient use of existing infrastructure and services and ensure that new housing has appropriate access to infrastructure and services, and
- (c) minimize the impact of residential development on the environment and resource lands.

Consistency: The planning proposal is consistent with Ministerial Direction 6.1 – Residential Zones.

The proposal seeks to rezone part of the site from E3 Productivity Support to R1 General Residential to facilitate approximately 202 residential lots within the South Nowra urban area. The proposal will contribute to the supply of additional housing within the Nowra-Bomaderry growth area and assist in meeting the projected housing needs of the Shoalhaven Local Government Area.



The site adjoins existing residential development and is supported by investigations demonstrating that water, sewer, electricity, telecommunications and transport infrastructure can be provided to service future development. The proposal also provides opportunities for a range of lot sizes and housing outcomes, supporting housing choice and diversity. By delivering additional housing in a serviced and strategically appropriate location adjoining the existing urban area, the proposal gives effect to the objectives of Ministerial Direction 6.1 – Residential Zones. Accordingly, the planning proposal is consistent with the direction.
Focus area 7: Industry and Employment
7.1 Employment Zones
Application: This direction applies to all relevant planning authorities when preparing a planning proposal that will affect land within an existing or proposed Employment zone (including the alteration of any existing Employment zone boundary). For the purpose of this Direction, Employment zones means the following zones • Employment • Mixed Use • W4 Working Waterfront • SP4 Enterprise • SP5 Metropolitan Centre
Objective: The objectives of this direction are to: (a) encourage employment growth in suitable locations, (b) protect employment land in employment zones, and (c) support the viability of identified centres.
Consistency: The planning proposal is inconsistent with Ministerial Direction 7.1 – Employment Zones; however, the inconsistency is justified by detailed economic analysis and the strategic merits of the proposal. The objective of the direction is to retain sufficient land for employment generating uses and to avoid the unnecessary reduction of business and industrial land. The proposal seeks to rezone part of the site from E3 Productivity Support to R1 General Residential. While this will reduce the extent of land available for future employment uses, an Economic Impact Assessment prepared in support of the proposal demonstrates that the South Nowra Employment Precinct and the broader Shoalhaven Local Government Area contain a substantial surplus of undeveloped employment land. The assessment concludes that approximately 60–70 years of undeveloped E3/E4 land supply exists within the Shoalhaven, based upon an assumed take-up rate of approximately 4–5 hectares per annum. The land proposed for residential rezoning is not considered to be among the most commercially attractive employment lands within South Nowra, owing to its limited visibility and exposure relative to land fronting the Princes Highway. Conversely, the proposal retains the most commercially viable employment lands and preserves the core function of the South Nowra Employment Precinct.



The Economic Impact Assessment further concludes that the proposal will support employment outcomes by providing additional housing in close proximity to established employment lands, improving opportunities for workers to live near employment centres and supporting local businesses through increased population and expenditure.

Accordingly, while the proposal results in the reduction of employment-zoned land and is therefore inconsistent with the strict application of Ministerial Direction 7.1, the inconsistency is justified by the demonstrated long-term surplus of employment land, the retention of strategically important employment lands and the broader housing and economic benefits arising from the proposal.

8.1 Mining, Petroleum Production and Extractive Industries

Application: This direction applies to all relevant planning authorities when preparing a planning proposal that would have the effect of:

- (a) prohibiting the mining of coal or other minerals, production of petroleum, or winning or obtaining of extractive materials, or
- (b) restricting the potential development of resources of coal, other minerals, petroleum or extractive materials which are of State or regional significance by permitting a land use that is likely to be incompatible with such development.

Objective: The objective of this direction is to ensure that the future extraction of State or regionally significant reserves of coal, other minerals, petroleum and extractive materials are not compromised by inappropriate development.

Consistency: The planning proposal is consistent with Ministerial Direction 8.1 – Mining, Petroleum Production and Extractive Industries.

The objective of this direction is to ensure that the future extraction of State and regionally significant resources is not compromised by inappropriate development and to minimise land use conflict between resource development and other land uses.

NSW Resources was consulted regarding the proposal and advised that there are no current exploration licences, mining titles or applications affecting the subject land. NSW Resources further advised that the subject land is considered to have low mineral prospectivity and does not contain any identified State or regionally significant mineral resource.

NSW Resources identified a regionally significant clay resource located approximately 500 metres from the site at 55 Links Road, South Nowra, which is subject to Mining Lease ML5087 and Mining Lease ML6322. NSW Resources recommended consultation with the title holder to ensure the proposal does not create land use conflict or unreasonably constrain existing mining operations.

The proposal does not affect the identified clay resource or any mining lease land. Furthermore, the Traffic Impact Assessment prepared in support of the proposal demonstrates that the surrounding road network has capacity to accommodate future development and identifies no adverse impacts on the operation of surrounding industrial or extractive industry land uses.

Accordingly, the proposal will not sterilise, fragment or compromise access to any identified State or regionally significant resource and is not expected to unreasonably constrain existing extractive industry operations. The proposal is therefore consistent with Ministerial Direction 8.1.



Site Specific Merit

5.3 Section C – Environmental, Social and Economic Impact

Is there any likelihood that critical habitat or threatened species, populations or ecological communities or their habitats, will be adversely affected because of the proposal?

A Biodiversity Certification Assessment Report (BCAR) has been prepared to assess the biodiversity impacts associated with the proposal. The assessment identified native vegetation, threatened species habitat and biodiversity values within parts of the site that may be affected by future development.

The proposal has been designed to avoid and minimise impacts on biodiversity values where practicable. Significant environmental areas associated with Browns Creek, habitat trees and vegetation corridors are proposed to be retained and protected through environmental conservation zoning. The proposal also provides for a biodiversity corridor connecting Browns Creek to Worrigee Nature Reserve and incorporates biodiversity offsetting in accordance with the Biodiversity Conservation Act 2016.

The BCAR concludes that the residual biodiversity impacts can be appropriately managed through the proposed avoidance, mitigation and offsetting measures. Accordingly, while the proposal has the potential to affect threatened species and their habitat, those impacts have been comprehensively assessed and appropriate conservation measures have been incorporated into the planning proposal.

Are there any other likely environmental effects of the planning proposal and how are they proposed to be managed?

A range of environmental matters have been investigated through specialist studies prepared in support of the planning proposal.

The proposal has the potential to result in impacts on native vegetation, threatened species habitat and biodiversity values. These impacts have been assessed through a Biodiversity Certification Assessment Report (BCAR), with significant environmental areas proposed to be retained and protected through environmental conservation zoning, biodiversity corridors and offsetting measures.



Flooding and bushfire hazards have been assessed through detailed technical investigations. The proposal has been designed to avoid or minimise these risks through the retention of flood-prone land associated with Browns Creek, the provision of Asset Protection Zones, perimeter roads and subdivision design measures consistent with Planning for Bush Fire Protection.

Potential impacts on water quality and stormwater management have been assessed through a Water Cycle Management Plan, which incorporates Water Sensitive Urban Design measures, stormwater treatment systems and detention infrastructure to protect downstream receiving environments.

A Preliminary Site Investigation concluded that the site is suitable for residential development subject to implementation of recommended management measures. Aboriginal cultural heritage values have been assessed through an Aboriginal Cultural Heritage Assessment, which concluded that no Aboriginal objects, sites or areas of archaeological potential were identified within the site.

The supporting technical investigations demonstrate that the identified environmental impacts can be appropriately avoided, mitigated or managed through the proposed zoning framework and future development controls.

Has the planning proposal adequately addressed any social and economic effects?

Yes.

The planning proposal has adequately addressed the likely social and economic effects through the preparation of a comprehensive Economic Impact Assessment and supporting technical studies.

From a social perspective, the proposal will facilitate approximately 202 additional dwellings within the South Nowra urban area, contributing to the supply of housing within the Nowra-Bomaderry growth area. The proposal will provide opportunities for a range of housing outcomes in proximity to employment lands, schools, retail centres, community facilities and other services, supporting the creation of a well-connected residential community.



From an economic perspective, the Economic Impact Assessment concludes that the proposal will generate additional population, household expenditure and economic activity within South Nowra and the broader Nowra-Bomaderry area. The assessment also demonstrates that the proposal will support local businesses and services and strengthen the role of established commercial centres.

While the proposal involves the rezoning of part of the South Nowra Employment Precinct, the Economic Impact Assessment demonstrates that substantial undeveloped employment land remains available within South Nowra and the broader Shoalhaven Local Government Area. The assessment concludes that the land proposed for rezoning has limited employment development potential relative to other employment lands within the precinct and that the proposal will not compromise the long-term employment function of the South Nowra Employment Precinct.

Accordingly, the social and economic effects of the proposal have been comprehensively assessed and the proposal is expected to result in an overall positive social and economic outcome for the Shoalhaven community.

5.4 Section D – Infrastructure (Local, State and Commonwealth)

Is there adequate public infrastructure for the planning proposal?

Yes.

The planning proposal is supported by a range of infrastructure investigations which demonstrate that adequate public infrastructure exists, or can be provided, to service future development of the site.

A Services Infrastructure Report confirms that potable water, wastewater, electricity and telecommunications infrastructure can be provided to the site. Consultation undertaken with Shoalhaven Water confirmed that the existing water network has sufficient capacity to service the proposal and that a feasible wastewater servicing strategy can be implemented through future infrastructure upgrades. Endeavour Energy has also confirmed that electricity supply can be provided from the existing South Nowra network and NBN services are capable of being extended to the site.



A Traffic Impact Assessment has been prepared and concludes that the surrounding road network has sufficient capacity to accommodate the additional traffic generated by the proposal. The assessment demonstrates that access can be provided via the existing road network and that future internal roads can be designed in accordance with Council's requirements.

The site is located adjacent to the existing South Nowra urban area and benefits from proximity to established community infrastructure, employment lands, retail centres, schools, recreational facilities and public transport services. The proposal therefore represents an efficient use of existing and planned infrastructure.

Shoalhaven City Council has an adopted Contributions Plan, which levies contributions on new residential development towards the provision and augmentation of community infrastructure including active recreation facilities, passive recreation areas, community facilities, roads and traffic management works, drainage infrastructure, car parking and emergency services infrastructure. It is not expected that the proposal will generate demand for social or community infrastructure that cannot be accommodated through existing infrastructure networks and the implementation of Council's contributions framework.

Accordingly, there is adequate public infrastructure to support the planning proposal, with any required local infrastructure upgrades capable of being delivered through future development works and applicable development contributions.

What are the views of state and federal public authorities and government agencies consulted in order to inform the Gateway determination?

The proposal will be referred to relevant government agencies during the required consultation period and during the Planning Proposal assessment.

6 Mapping

The map sheets in the LEP 2014 proposed to be amended are:

- Land Zoning – LZN_013F
- Minimum Lot Size – LSZ_013F



- Clauses Map – CLS_013F

For specific mapping changes please refer to **Section 4** of this document.

7 Community Consultation

Community consultation will be undertaken by the Shoalhaven City Council for the planning proposal.

8 Project Timeline

The project timeline is outlined in **Table 6** below:

Table 6: Project Timeline

Stage	Timeframe and /or date
Lodgement of Planning Proposal	June 2026
Consideration by council	August 2026
Council decision	September 2026
Gateway determination	October 2026
Pre-exhibition Commencement and completion of public exhibition period	December 2026
Consideration of submissions	January 2027
Post-exhibition review and additional studies	February 2027
Submission to the Department for finalisation (where applicable)	March 2027
Gazettal of LEP amendment	April 2027

9 Conclusion

This Planning Proposal has been prepared in accordance with Section 3.33 of the *Environmental Planning and Assessment Act 1979* and the Department of Planning, Housing and Infrastructure's *Local Environmental Plan Making Guideline* (August 2023).



The Planning Proposal and supporting technical investigations have comprehensively considered the strategic and site-specific opportunities and constraints affecting the land, including biodiversity, flooding, bushfire, infrastructure servicing, traffic, contamination, Aboriginal cultural heritage and economic impacts. The supporting studies demonstrate that the site is capable of accommodating additional residential development whilst appropriately managing environmental constraints and protecting significant ecological values.

From a strategic planning perspective, the proposal will deliver a significant public benefit by:

- facilitating approximately 202 additional dwellings within the Nowra-Bomaderry growth area;
- increasing housing supply and housing diversity in response to demonstrated housing demand and affordability pressures within the Shoalhaven;
- providing housing in close proximity to employment lands, community facilities, services and infrastructure;
- protecting approximately 9.3 hectares of environmentally sensitive land through environmental conservation zoning; and
- supporting the ongoing growth and role of Nowra as the Shoalhaven's principal regional centre.

The proposal responds to contemporary housing challenges facing the Shoalhaven and NSW more broadly. The need for additional housing is well documented through State, Regional and Local strategic planning documents, including the Illawarra Shoalhaven Regional Plan 2041, Housing 2041 – NSW Housing Strategy, the Shoalhaven Affordable Housing Strategy 2024 and Shoalhaven 2040 Local Strategic Planning Statement. The proposal directly contributes to the objectives of these strategies by increasing housing supply in a serviced urban location whilst balancing environmental conservation outcomes.

The proposal represents a logical extension of the existing South Nowra residential area and is capable of being serviced by existing and planned infrastructure without imposing an unreasonable burden on Council's infrastructure delivery program. The proposed residential development is contiguous with existing urban development



and has been designed to respond to identified environmental constraints through a combination of avoidance, conservation zoning and future management measures.

Having regard to the strategic planning framework, the supporting technical investigations and the demonstrated need for additional housing within the Shoalhaven, the Planning Proposal exhibits both strategic merit and site-specific merit. Accordingly, it is considered appropriate that the proposal proceed to Gateway determination and public exhibition.

10 Appendices

Appendix 1 – Maps

Appendix 2 – Subdivision Concepts

Appendix 3 – Technical Studies

11 Technical Studies

Study	Title	Author	Date
1	Biodiversity Certification Assessment Report	Narla Environmental	May 2026
2	Strategic Bush Fire Assessment	Harris Environmental Consulting	May 2026
3	Flood Impact and Risk Assessment	Civplan	February 2026
4	Preliminary Site Investigation	Terra Insight	October 2025
5	Aboriginal Cultural Heritage Assessment	Apex Archaeology	May 2026
6	Noise Impact Assessment	Rodney Stevens Acoustics	June 2026
7	Nowra Rifle Range Operational Impact Assessment	GHD	May 2026
8	Traffic Impact Assessment	Mclaren Traffic Engineering and Road Safety Consultants	June 2062
9	Watercycle Management Plan	Civplan	April 2026
10	Economic Assessment	GapMaps	May 2026
11	Infrastructure	Civplan	June 2026
12	Concept Civil Design Plans	Civplan	April 2026