



131 St Vincent Street, Ulladulla

Mixed use development – Economic Assessment

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Prepared for

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Table of contents

Executive summary	1
Introduction	5
Section 1: Site location and proposed development	7
1.1 Site location and context	7
1.2 The locality	9
1.3 Policy context	10
1.4 The Planning Proposal	12
Section 2: Milton-Ulladulla Structure Plan	14
2.1 Population: Profile and Growth	14
2.2 Employment overview	16
2.3 Dwelling Supply-Demand and Housing Affordability	17
2.4 Housing affordability issues for workers	18
2.5 Vacancy rates	19
2.6 Preliminary Growth Scenario	19
2.7 Restricted Availability of High Density Housing Stock	20
Section 3: Strategic Plans and Economic Development Strategy	22
3.1 Shoalhaven Local Strategic Planning Statement	22
3.2 Shoalhaven 2032 Community Strategic Plan	22
3.3 Shoalhaven Regional Economic Development Strategy 2018-2022	23
3.4 Illawarra Shoalhaven Regional Plan 2041	25
Section 4: Commercial and Industrial land assessment	26
4.1 Ulladulla Town Centre	26
4.2 Current and future provision of Industrial Land	28
Section 5: Economic Impacts/Benefits of the Proposal	31
5.1 Assessment of Proposal against Strategic Plan and Economic Development Strategy	31
5.2 Employment creation	32
5.3 Commercial floorspace	34
5.4 Contribution to Gross Regional Product (GRP)	34
5.5 Impacts on Ulladulla Town Centre	36

5.6	Local Planning Direction 7.1	37
Section 6:	Conclusion	41

Executive summary

This Economic Impact Assessment is provided as a supporting technical analysis for a Planning Proposal which is seeking to amend the zoning of the site at 131 St Vincent St, Ulladulla (the Site) from E4 General Industrial to MU1 Mixed Use under the Shoalhaven Local Environment Plan 2014 (LEP), to enable a mixed-use development to be built on the site. The Site is situated approximately 490 metres south of the retail core of the Ulladulla Town Centre and adjoins an R3 Medium Density Residential zone to its immediate north and B5 Business Development zone to its east.

The mixed-use development proposed for the Site comprises approximately 250 new apartments plus a childcare centre offering 120 places, and 4,710 sqm of Commercial gross floor area (GFA), across four buildings.

Such an addition of smaller, and more diverse, and adaptable dwellings compared to the existing local stock (mostly town houses or single dwellings on large blocks) would assist in addressing a number of the identified concerns regarding housing supply and affordability within the Milton-Ulladulla area as well as achieving the identified objectives of the Milton-Ulladulla Structure Plan Review by:

- providing more diverse and adaptable housing within the Milton-Ulladulla area to accommodate the growing and ageing population;
- providing accommodation for smaller households and a greater diversity of housing types to accommodate changing household size and structure;
- providing a significant share of the dwellings identified as being required within the infill growth option areas, in light of the likely constraints to mixed use development in those areas as detailed above;
- contributing significantly to the availability of more affordable housing;
- providing alternative dwelling options for the growing cohort of empty nesters and retirees within Milton and Ulladulla; and
- enabling housing stock suitable for larger families (i.e. detached dwellings of three bedrooms or more) to be occupied by larger families by providing an increased range of alternatives for people who do not need/want larger homes to downsize to smaller homes.

In addition, the Site can be seen as a southern anchor to the identified medium density growth area in Ulladulla on the western side of the Princes Highway. Delivery of the proposed development could act as a catalyst for further medium density development within the adjoining R3 Medium Density zoned land.

In regard to *Local Planning Direction 7.1*, the Planning Proposal:

- **encourages employment growth in suitable locations** – by helping create much higher density employment than currently exists at the Bunnings Warehouse use on the site as well as construction jobs and flow-on jobs across the economy;

- **protects employment land in employment zones** – by proposing a MU1 Mixed Use zone which is an employment zone that also permits light industrial uses, meaning that there is no net change of employment land that can support industrial uses;
- **support the viability of identified centres** – by providing 250 additional dwellings in the immediate vicinity of the Ulladulla Town Centre and new commercial floorspace that will bring new residents and workers into the Ulladulla Town Centre for their retail, commercial, and community needs. The proposed childcare centre will support existing and new workers in the Town Centre while Local retail and non-retail businesses in the Town Centre and immediate surrounds will benefit from this additional resident and daily worker population. The new resident population on site is expected to consist of persons new to the immediate locality, creating a net increase in the spending on retail and commercial services in the Town Centre, and given the proximity, these residents would likely spend a reasonable proportion of their retail expenditure in the Town Centre. The new commercial GFA is expected to consist of businesses that are presently home based (scaling up), based elsewhere in the region or newly formed, or potentially co-working space that would include typically workers working from home. This would present a net increase in workers in proximity to the Town Centre. These workers will utilise the Town Centre for convenience shopping, lunch/coffees and retail and non-retail services.

Below, we outline more specifically how the rezoning of the Site from E4 General Industrial to MU1 Mixed Use will achieve the objectives of *Local Planning Direction 7.1*:

Objective 7.1(a) – to encourage employment growth in suitable locations

Whilst the Site currently contains employment uses, the proposed development adds 4,710 sqm of commercial floorspace, and a 120 place childcare centre, and is estimated to support 189 Full Time Equivalent (FTE) on-site jobs. This is significantly more than the existing Bunnings Warehouse store on the Site, which supports around ~60 FTE jobs. The positive outcomes of residential use and value of construction to the economy aside, the Site as a mixed-use development presents significantly higher and better value than its current use i.e., more jobs and greater economic activity (greater flow-on jobs across the economy).

Objective 7.1(b) – to protect employment land in employment zones

The proposed development protects employment land in employment zones because there is no loss of employment land or loss of opportunities for employment. A transition from one employment zone (E4 General Industrial) to another (MU1 Mixed Use) will actually *increase* (author emphasis) employment opportunities and support broader employment generation and opportunities. Under an E4 zoning, employment is limited to industrial and related industries however under MU1 Mixed Use zoning, employment is broadened to include business, retail and office alongside light industrial uses which collectively could generate more jobs than general industrial uses, noting the Site currently supports Bulky Goods retail in the form of Bunnings Warehouse.

Objective 7.1(c) – to support the viability of identified centres

‘Identified centre’ is a defined term under Direction 7.1. As above, Ulladulla is a major town centre and its recognition as such (including recognition as a strategic centre in the Illawarra Shoalhaven Regional Plan (ISRP)), means it meets the definition of ‘identified centre’. The proposed development, by providing additional dwellings and workspaces adjacent to the town centre, will support the viability of the town centre by increasing the residential and worker populations in the area. Increased populations will bring vibrancy and foster community but will also generate business for existing businesses in the Ulladulla Town Centre.

The economic benefits of this Planning Proposal (and thus, community benefits) significantly outweigh the theoretical loss of 1 hectare of industrial land through the transition of the Site from E4 General Industrial to MU1 Mixed Use zoning (which actually allows light industrial uses), and for which (industrial use) the Site has not been historically used.

Economic Benefits of this Planning Proposal

A summary of economic benefits based on the indicative site layout, and associated uses including residential and affordable housing, commercial premises, and childcare is as follows:

- A net increase of approximately 250 residential apartments, accommodating an additional population of approximately ~600 people (at 2.3 – 2.4 persons per dwelling), noting that at present there is capacity within Milton-Ulladulla for only 280 – 540 infill dwellings at present.
- The provision of around 60 affordable housing dwellings from a total of 250 dwellings, with 50 dwellings to be rented long term via the proponent’s Community Housing Provider, and 10 dwellings sold to market at an affordable level for key workers and vulnerable community members;
- An estimated annual contribution to Shoalhaven LGA’s Gross Regional Product (GRP) of \$18 million;
- An estimated development phase contribution to Shoalhaven LGA’s GRP of \$70 million over 24 months (\$120 million construction cost);
- The proposal will include new affordable and key worker housing in proximity to employment, transport and amenities;
- The proposal will provide 4,710 sq.m of employment uses, generally expected to be commercial services and a 120 place childcare centre;
- The proposal will provide an estimated 189 permanent FTE jobs on site when completed as compared to the current site which supports 60 FTE jobs;
- Design and construction will directly provide 514 FTE jobs over a 24 month period;
- The proposal will provide an estimated \$0.6 – 0.8 million in annual rates to council;

- This proposal will increase the annual resident spend on surrounding businesses. A new population of around 600 persons would increase potential retail expenditure around \$9 - 10 million, not all of which would be captured in Ulladulla as it does not cater to all forms of retail.

Furthermore, the Planning Proposal would make a positive contribution to the identified endowments of the Region by:

- broadening the Location, Accessibility and Lifestyle Benefits available to residents and visitors; and
- improving the options available for labour resources, both through the provision of on-site employment opportunities and the increased diversity and flexibility of housing that will be provided by the completed project, at a location close to jobs.

Introduction

This report presents an Economic Impact Assessment (EIA) for a proposed mixed-use development at 131 St Vincent Street, Ulladulla. The site is currently occupied by a Bunnings Warehouse. Bunnings will be vacating this site and relocating to a new premises, just 200m away, fronting the Princes Highway which will accommodate a purpose-built development that will be more than twice the size of the existing store at the Site.

This EIA is provided as a supporting technical analysis for a Planning Proposal which seeks to amend the zoning of the Site to MU1 Mixed Use and to increase the height and Floor Space Ratio (FSR) controls under the Shoalhaven LEP 2014, to enable the proposed mixed-use residential and commercial development to be built.

The key purpose of this report is to provide technical analysis of the economic impact of the development in view of *Local Planning Direction 7.1* which states:

(1) A planning proposal must:

- a) give effect to the objectives of this direction,
- b) retain the areas and locations of Employment zones,
- c) not reduce the total potential floor space area for employment uses and related public services in Employment Zones,
- d) not reduce the total potential floor space area for industrial uses in E4, E5 and W4 zones, and
- e) ensure that proposed employment areas are in accordance with a strategy that is approved by the Planning Secretary.

Local Planning Direction 7.1 confirms that a Planning Proposal can be inconsistent with this Direction, where it is supported by a technical study “which gives consideration to the objectives of the direction” which are to:

- a) encourage employment growth in suitable locations,
- b) protect employment land in employment zones, and
- c) support the viability of identified centres.

This technical report addresses the objectives of *Local Planning Direction 7.1* and examines the need and economic impacts of the Planning Proposal. The report is outlined as follows:

- i. **Section 1** reviews the location of the Site and its context having regard to the proposed development.
- ii. **Section 2** examines the Milton-Ulladulla Structure Plan, including the objectives of the recent review of the plan and the findings of the background analysis.
- iii. **Section 3** addresses the desirability/suitability of the proposed development, having regard to the Shoalhaven Community Strategic Plan and Shoalhaven Regional Economic Development Strategy.

- iv. **Section 4** assesses the commercial and industrial land needs across Milton-Ulladulla.
- v. **Section 5** examines the economic impact of the proposal having regard to *Local Planning Direction 7.1*, in particular the impacts on the Ulladulla Town Centre and the industrial land supply in Ulladulla.

Section 1: Site location and proposed development

1.1 Site location and context

The subject site is located at 131 St Vincent Street, Ulladulla (the Site) and is situated on the western side of St Vincent Street, one block to the west of the Princes Highway and 350 m south of the Ulladulla Town Centre, in the Shoalhaven Local Government Area (LGA) on the NSW south coast. The Site has an approximate area of 1 hectare (10,000 sqm). The Shoalhaven LGA is located 253 km from Sydney and 198 km from Canberra.

Ulladulla is the southern most major town centre within the Shoalhaven LGA, located 64 kms south of Nowra. Ulladulla is part of the Shoalhaven City Council's (SCC) Milton-Ulladulla Structure Plan (MUSP) area which also includes the suburbs of Milton, Narrawallee, Mollymook, Mollymook Beach, Kings Point, Burrill Lake and Dolphin Point.

The Site is bordered by the Dunn Lewis Community Centre to its south; medium density and single dwelling residential development to its north; and industrial development to its west. Directly opposite the site, on the eastern side of St Vincent Street, the land use is primarily showroom/large format retail including a lighting warehouse, car wash, storage, a furniture store, garden supplies and the like. Figure 1.1a below shows the site location and context.

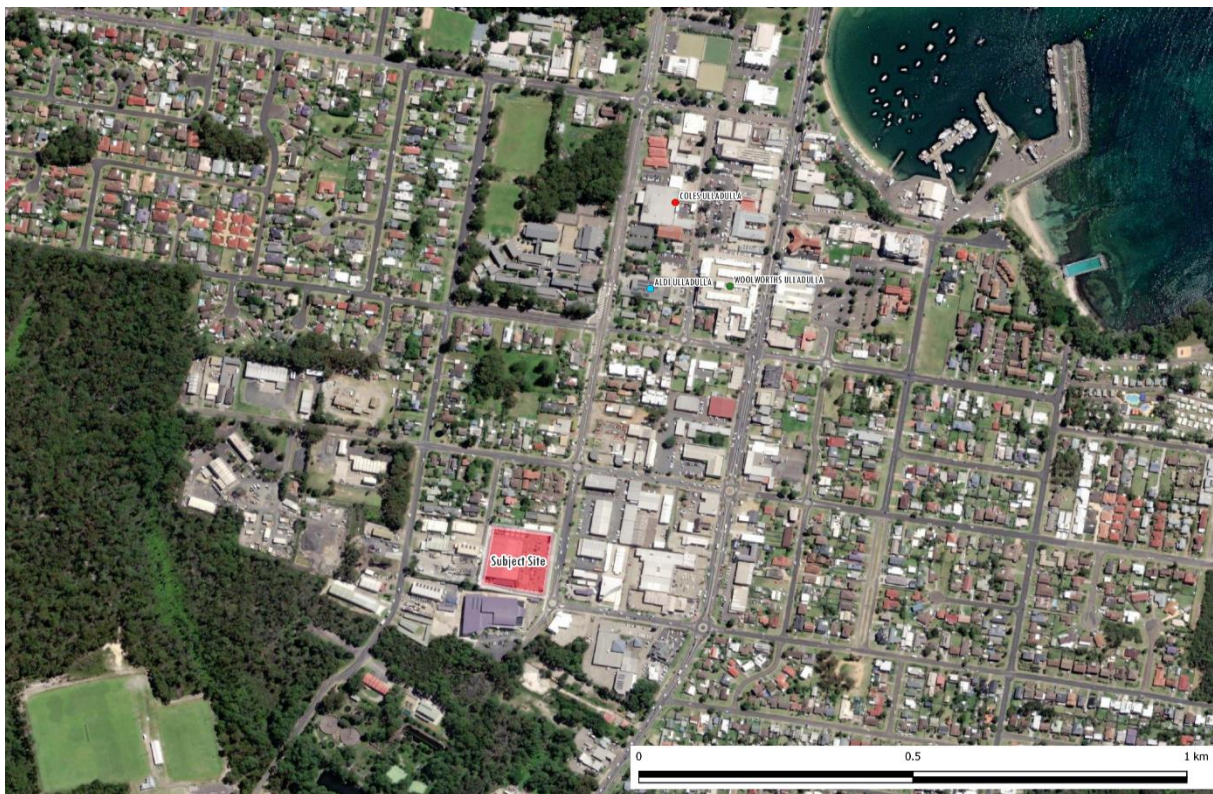


Figure 1.1a: Site Location

As a result of the geographic proximity to Nowra and Batemans Bay, the Ulladulla town centre is an important regional contributor to housing and employment. This is an important concept of this report and aligns with the SCC's 2022 review of the MUSP (MUSP review) in response to the emerging housing availability and affordability challenges in the Shoalhaven LGA.

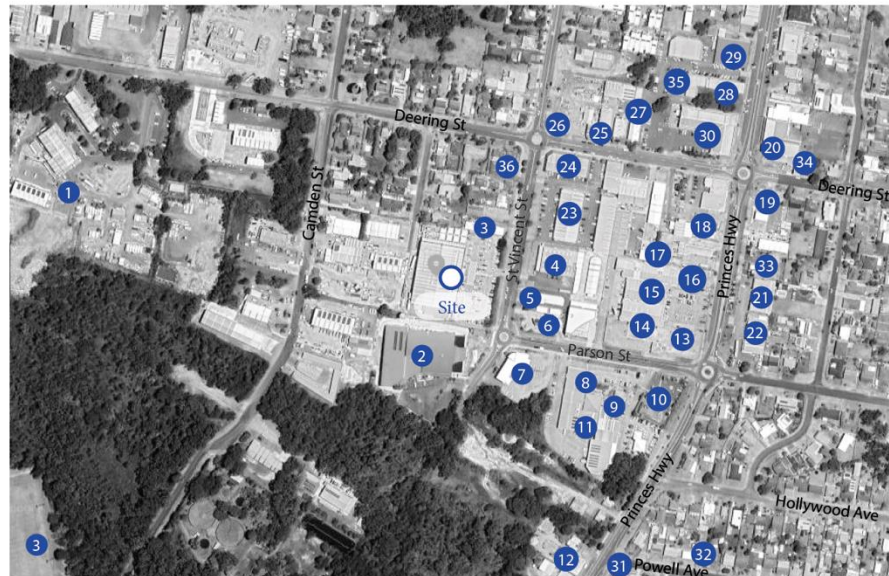
The Site is situated some 490 m from the Ulladulla Town Centre and, as detailed on Figure 1.1b and Figure 1.2 below, adjoins an R3 Medium Density Residential zone to its immediate north and an E3 zone to its east.

1.0 Introduction

1.5 Ulladulla Context

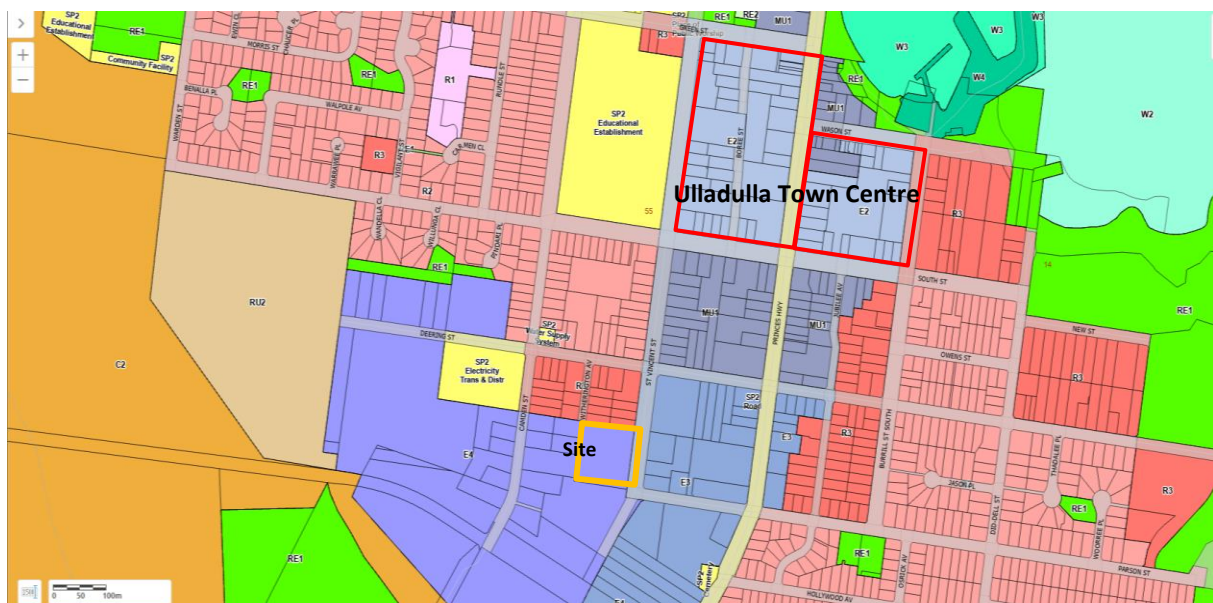
Legend

1	SH Council Ulladulla Branch
2	Dunn Lewis Centre
3	Mollymook Bridge Club
4	Furniture 4U
5	Ulladulla Storage
6	Blue Room Car Wash
7	Project Lighting
8	Masters Builders
9	Mavericks Coffee
10	McDonald's
11	Betta Electrical
12	New Bunnings
13	Zambrano / Oporto
14	Super Cheap Auto
15	Best and Less
16	Subway
17	Service NSW
18	Caltex Service Centre
19	Ampol Service Centre
20	Country University Centre
21	Recco
22	Mitre 10
23	Boots Great Outdoors
24	Office National
25	F45 Gym
26	Lucky's Seafood
27	Hales Douglas Accounting
28	Craft Coffee / Florist
29	Sportspower / Toy World
30	Harris Scarfe
31	Ulladulla Podiatry
32	Sally Jacobs Remedial Massage & Sports Therapy
33	Pigeon House Motor Inn
34	Tribe Fitness Studio
35	Stacey Abbott Podiatry
36	Ulladulla Support Services



This diagram gives a greater understanding of the surrounding businesses located close to the site. Due to the number and types of businesses located close to the site it would not be out of place for the commercial and retail opportunities proposed as part of the proposal.

Figure 1.1b: Site and Surrounding Uses



Source: maps.shoalhaven.nsw.gov.au

Figure 1.2: Site and Surrounding Land Zones

1.2 The locality

The Shoalhaven LGA is a growing residential and tourist area. According to the Australian Bureau Statistics (ABS), the Shoalhaven Estimated Resident Population (ERP) is 111,905 as at 2023. Approximately 17,000 people (or 15% of the Shoalhaven population) reside in Ulladulla and the MUSP area.

Population growth across the Shoalhaven LGA is expected to be ‘*modest to strong*’ reaching approximately 143,000 by 2051 (source: .id/Shoalhaven Council). If Ulladulla and the MUSP area maintains its share of the Shoalhaven population, this would equate to an additional 5,000 persons by 2051. At an average dwelling occupancy rate of 2.3 – 2.4 as at the 2021 ABS Census, this would require around 2,100 – 2,200 dwellings by 2051.

SCC’s Background Fact Sheet 1 to the MUSP review expects an increase of over 3,700 residents in Ulladulla and the MUSP area by 2051 (which means a declining share of the broader Shoalhaven LGA) but notes:

‘...this is a constrained estimate that is based on existing land zones and development approvals. Recent development trends and population increases suggest that actual population growth may be higher.’

Background Fact Sheet 3 identifies that approximately 3,250 new dwellings will be needed by 2051, significantly more than the current capacity of 1,400. As such, an additional 1,850 new dwellings are needed by 2051 to meet future demand. In practical terms, the rate of increase in demand for housing is likely to be higher than this due to:

- the decline in average household size and
- forecast continued disproportionate growth in the older age cohorts.

This will mean that the rate of increase in demand for housing will be even higher than the rate of increase in population. Background Fact Sheet 1 concludes: ‘*Current population projections highlight the need to plan for more diverse and adaptable housing within the Milton-Ulladulla area to accommodate growing and ageing population.*’

Due to current and projected housing demand and the existing identified shortfall in supply, opportunities for ‘shovel ready’ housing projects should be granted due consideration. This would alleviate the shortfall and housing stress within the region whilst SCC undertakes further strategic planning studies through structure planning and Local Environment Plan (LEP) review processes.

Due to the Site’s proximity to the Ulladulla Town Centre, the surrounding zoning/land use, as well as existing infrastructure (roads, utilities etc) already servicing the site, we consider it to be ‘shovel ready’ (subject to rezoning).

The Site is zoned E4 General Industrial under the Shoalhaven LEP 2014 and is currently occupied by Bunnings Warehouse. The land immediately north of the Site is zoned R3 Medium Density Residential. Bunnings Warehouse is relocating to new premises across the road with frontage to Princes Highway (currently under construction (DA20/1068)). It is expected that Bunnings Warehouse will transfer its operations to its new premise from mid-2024.

Outside of Sydney, the Shoalhaven LGA is the most visited LGA in NSW. The Shoalhaven Destination Management Plan 2018-2023 (DMP) recognises visitors are a significant contributor to the local economy, generating around \$850 million in economic benefits per annum and supporting round 5,000 jobs.

The Ulladulla Town Centre is made up of primarily older, low rise retail buildings, with an exception being the new Woolworths anchored shopping centre. The proposed development presents an opportunity to contribute to the revitalisation of the Town Centre by generating increased population within the immediate vicinity of the Town Centre. The Site is positioned as a southern anchor of the higher density growth area on the western side of the Princes Highway.

1.3 Policy context

The NSW Department of Planning and Environment's Illawarra Shoalhaven Regional Plan 2041 (ISRP) is a strategic 20-year land use plan guiding land use planning priorities and decisions. The ISRP outlines four vision themes supported by 30 directions to guide growth and realise the overarching vision of the South Coast region to be an innovative, sustainable, resilient, connected, diverse and creative region. The ISRP identifies Milton-Ulladulla as a strategic centre and:

- identifies Ulladulla Harbour as an opportunity for marine tourism
- recognises Ulladulla as a place for housing choice
- supports removing barriers to housing supply in Milton-Ulladulla
- expects residential density to increase

The ISRP defines strategic centres as 'well-serviced centres with opportunities for new housing.' Of the 30 objectives (directions), this report identifies that the proposed development will address, in particular, the following objectives:

Objective 5: Diverse Visitor Economy

The creation of a diverse visitor economy requires an appropriate workforce to service the hospitality industry. It is evident from the feedback received via interviews conducted of all large and many smaller employers in Ulladulla, that the hospitality industry in Milton-Ulladulla faces significant challenges with attracting and retaining staff, particularly during peak periods. One of the significant challenges faced is the

availability/affordability of housing for such workers. The proposed development provides 60 affordable units and key worker accommodation.

Objective 18: Providing housing supply in the right areas

The proposed development provides housing in a location immediately adjoining the R3 Medium Density Residential zone and is within walking distance of the Ulladulla Town Centre. As such, it is considered that the proposed development provides housing in the “in the right location”.

Objective 19: Deliver housing that is more diverse and affordable

This objective acknowledges that households have varying needs and budgets and as such the community requires a range of housing types. The objective also identifies changing household sizes and preferences with a trend towards smaller dwellings within walking distance of shops and services. The proposed development offers smaller, more diverse, more adaptable, and more affordable dwellings which will contribute to providing a diversity of housing choices and dwelling sizes. The proposal includes ~60 affordable dwellings (from a total of 250) which the proponent intends to target for key worker (and vulnerable persons) accommodation to be serviced via a Community Housing Provider partner.

Objective 21: Respond to the changing needs of local neighbourhoods

The change in the nature of the local population over time has created an increased need for a more diverse dwellings mix and for smaller dwellings. The proposed development offering smaller dwellings presents a response to this need. Other strategic plans relevant to the site and to which this report has regard to include:

- Shoalhaven 2040 [Local] Strategic Land-use Planning Statement (LSPS) and framework which also includes:
 - Growth Management Strategy version 1 (GMS)
 - Shoalhaven Affordable Housing Strategy December 2017 (AHS)
 - MUSP (Milton-Ulladulla Structure Plan September 1996)
- Shoalhaven 2032 Community Strategic Plan (CSP)
- Shoalhaven Regional Economic Development Strategy – 2023 Update (REDS)

The Milton Ulladulla Structure Plan

At SCC’s 28 August 2023 Ordinary Meeting, the MUSP review was confirmed to be, moving forward, incorporated into the new Shoalhaven Land Use Planning Scheme, Citywide Land Use Planning Scheme. The common themes and objectives of the above strategies and plans include:

- Supporting a growing population through housing choice and employment opportunities
- Acknowledgement that Milton-Ulladulla is a major urban area of the Shoalhaven
- Maintaining a growing economy and supporting those key industries including construction and tourism

The Shoalhaven Contributions Plan

Separately but related the Shoalhaven Contributions Plan supports development through the collection of levies which assist in funding infrastructure upgrades and other social infrastructure important to the Shoalhaven including:

- Recreation facility upgrades (Planning Area 5)
- Southern Shoalhaven Branch Library
- St Vincent Street Extension to Princes Highway and Roundabout, South Ulladulla
- Shoalhaven Entertainment Centre (Bridge Road Nowra)
- Shoalhaven Regional Gallery
- Citywide Fire and Emergency services

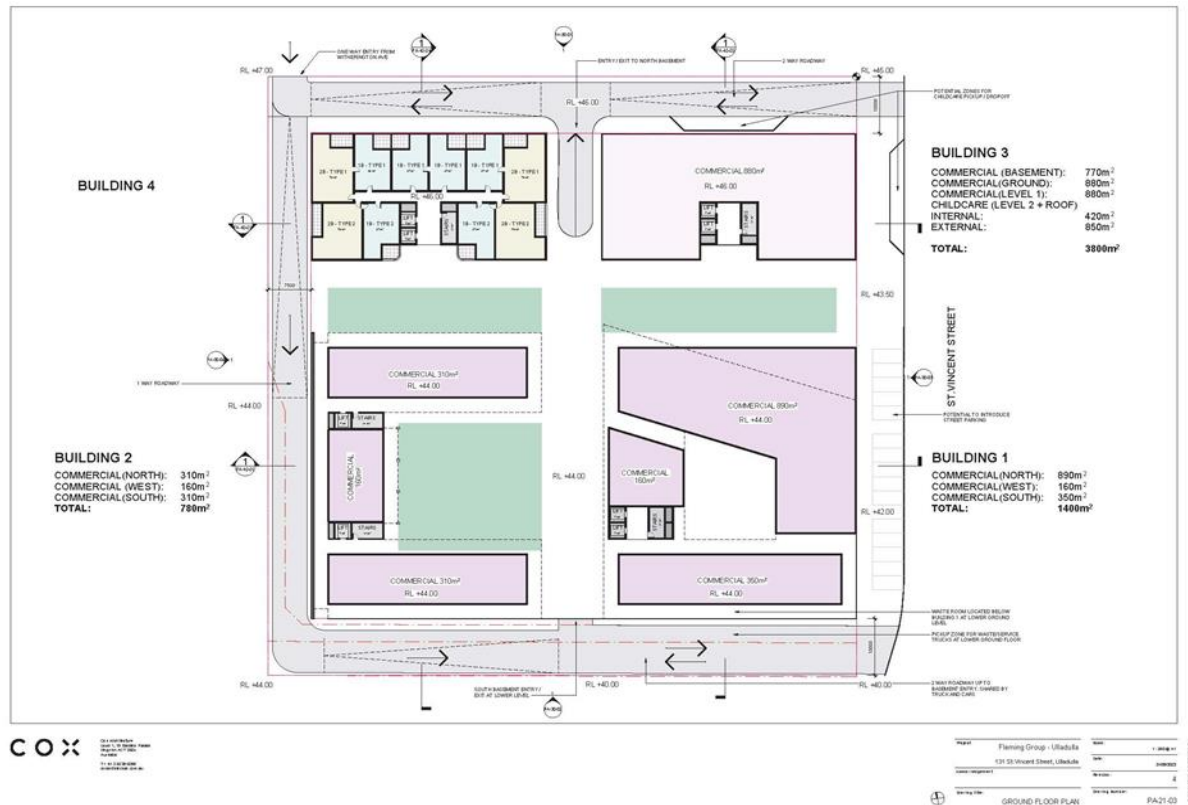
There are some 93 Contribution Projects and levies collected from the proposed development, which are expected to make a significant contribution to those projects.

1.4 The Planning Proposal

Development in accordance with the Planning Proposal would provide a mix of land uses, including commercial, residential and childcare being in the order of:

- 19,000 sq.m GFA of residential space, equating to approximately 250 apartments
- 4,710 sq.m GFA of commercial space
- A 120 place centre-based childcare facility (1,000 sq.m)

An indicative ground floor layout of a potential scheme for the site is shown in Figure 1.3 below. The Proponent has advised that the entire development will be developed within 24 months of approvals.



Source: Cox Architecture, 2023

Figure 1.3: Indicative Ground Floor Layout

Section 2: Milton-Ulladulla Structure Plan

SCC released various explanatory documents and discussion papers in late 2022 relating to the review of the Milton-Ulladulla Structure Plan (the Structure Plan Review). In the *Explanatory Statement*, dated 17 October 2022, Council indicated that it had commenced its review of the existing Structure Plan in August 2022 ‘... in response to the emerging housing availability and affordability situation...’ and that “Council is revisiting long-term land use planning for Milton, Ulladulla and surrounds to inform responses to forecast population growth and the demand for new and different types of homes for the next 25-30 years”.

At SCC’s 28 August 2023 Ordinary Meeting, it was confirmed that the Structure Plan Review would not be progressed, and instead strategic zoning considerations would be progressed through an LGA wide review of the Shoalhaven LEP. Given the time that will be required to undertake this process, the proponent determined that a Spot Rezoning would be progressed for the Site through a Planning Proposal.

The information and background sheets released as part of the consultation process for the Structure Plan Review are relevant to the consideration of this rezoning. These are discussed in the following section.

2.1 Population: Profile and Growth

As part of the Structure Plan Review process, Council issued a fact sheet (Background Fact Sheet 1: Population and Census) detailing the population numbers and trends as well as the key features of the resident population for the Milton-Ulladulla Study Area. The study area population reported in the Census of Population and Housing at 2021 was 17,026, an increase of approximately 11.4% or some 1,748 people since the 2016 Census. The main contributor to population growth over the intercensal period was regional migration, particularly among older age groups.

The Population and Census fact sheet also examines the changes in the study area population over the past 30 years, drawing on the Census results of 1991 versus 2021, and highlights the conclusions that the population is getting older; households are getting smaller; and many people are choosing to remain in their home as they grow older. In addition, as compared to the broader Shoalhaven municipality and regional NSW, the population fact sheet also shows that Milton-Ulladulla has:

- a higher percentage of people aged 60–69, referred to as ‘empty nesters and retirees’
- a higher percentage of people aged 70–84, referred to as ‘seniors’
- a lower percentage of people aged 18–24, referred to as ‘tertiary education and independents’
- a lower percentage of people aged 25–34, referred to as ‘young workforce’

The time series analysis also shows that people aged 60+ now account for 40.1% of the study area population compared to 29.7% in 1991. By contrast, younger people aged 18–49 now comprised 29.1% of the population,

compared to 36.3% in 1991. The average household size has reduced from 2.53 in 1991 to 2.25 at 2021. The analysis shows that Milton-Ulladulla is a preferred place of residence for empty nesters and retirees, with 20% of all 'couples without children' in Milton-Ulladulla being aged 65+.

Table 2.1 below presents a summary of the demographic profile of the study area population as compared with the respective total non-metro NSW and national benchmarks.

Table 2.1 Milton-Ulladulla - study area population socio-demographic profile			
Metrics	Milton-Ulladulla Study Area	Non-Metro NSW	Aust. Avg.
Age and Household Size			
0 to 4 years	4.7%	5.5%	5.8%
5 to 14 years	10.5%	12.4%	12.5%
15 to 24 years	7.9%	11.2%	12.0%
25 to 44 years	18.4%	23.1%	28.0%
45 to 54 years	11.1%	12.3%	12.8%
55 to 64 years	15.4%	13.5%	11.9%
65+	32.0%	22.1%	17.1%
Avg. age (years)	47.5	41.5	38.9
Households			
Total Private Dwellings	9,036	1,206,503	10,318,926
Occupied Private Dwellings	6,974	1,071,609	9,275,075
% of Dwellings Not Occupied	23%	11%	10%
Avg. H'hold Size	2.3	2.4	2.5
Income			
Per Capita Income	\$43,513	\$50,160	\$55,535
Variation from average	-13.3%		
Avg. H'hold Income	\$77,291	\$92,634	\$105,794
Variation from average	-16.6%		
Home Ownership			
Owned	51.3%	38.7%	31.5%
Mortgage	26.4%	34.0%	37.4%
Renting	22.2%	27.3%	31.2%
Birthplace			
Australia	87.4%	88.5%	72.0%
United Kingdom	5.5%	3.5%	4.7%
South & Central Asia	0.2%	1.2%	4.7%
South East Asia	0.8%	1.1%	4.1%
North East Asia	0.4%	0.5%	3.4%
New Zealand and Oceania	1.6%	1.3%	2.6%
Other	4.0%	3.9%	8.6%
Source: ABS Census 2021			

As detailed in Table 2.1 above, the Milton-Ulladulla population is on average much older than the population of non-metropolitan NSW overall and also much older than the national average. The Census data also shows that household income levels (about 16% below average) in Milton-Ulladulla are well below the respective benchmarks and that the proportion of houses that are unoccupied (i.e., primarily holiday homes) is more than twice the average for non-metro NSW and the national average (23% vs 11 and 10%).

The average household size of 2.3 persons is below the NSW average of 2.6, reflecting a higher prevalence of lone person (29%) households, older couples and fewer families.

Council has engaged independent demographic consultants (Informed Decisions or .id) to prepare population forecasts for all local areas of the Shoalhaven LGA including the Milton-Ulladulla Study Area. Council's background population paper notes that the .id forecasts for the population of Milton-Ulladulla shows an expected increase of more than 3,700 people by 2051 but further notes that:

*'... this is a **constrained estimate** that is based on **existing land zones and development approvals**. Recent development trends and population increases suggest that actual population growth may be higher.'*

The background paper also projects further declines in average household size and a continued disproportionate growth in the older age cohorts for Milton-Ulladulla, meaning that the rate of increase in demand for housing will be even higher than the rate of increase in population.

Importantly, the background paper concludes as follows:

'Current population projections highlight the need to plan for more diverse and adaptable housing within the Milton-Ulladulla area to accommodate a growing and ageing population.'

2.2 Employment overview

As at the ABS Census 2021, around 30% of the working population within the Milton-Ulladulla region are managers and professionals, up from about 27% in 2011, demonstrating the steady shift towards a white-collar workforce, which aligns with the proposed commercial mix in the planning proposal.

The major employment sectors in Milton-Ulladulla are: Construction (14%), Health Care and Social Assistance (13%) and Retail Trade (13%). The strength of the tourism sector is demonstrated by the comparison of Retail Trade (13% vs. 9.5% NSW) and Accommodation and Food Services (13% vs. 11% NSW), in the Shoalhaven LGA with the NSW average.

2.3 Dwelling Supply-Demand and Housing Affordability

The topics of dwelling supply and demand as well as housing affordability have also been addressed in background fact sheets prepared by Council as part of the Milton-Ulladulla Structure Plan Review. The key findings and conclusions which are set out in the relevant fact sheet (Background Fact Sheet 2 and Background Fact Sheet 3) are as follows:

- The level of housing stress, defined as the incidence of households which spend more than 30% of their gross household income on rental or mortgage repayments, is noticeably higher in the study area than either the broader Shoalhaven municipality, regional NSW or Australia. Examination of the median house prices within the study area further revealed such affordability challenges, with all localities being significantly more expensive than the regional NSW median.
- Community surveys undertaken by Council show that all people aged 0–34 and 84% of people under the age of 60, consider housing in the study area to be “unaffordable”.
- Compared to the total Shoalhaven municipality and regional NSW, the study area has a higher percentage of 3 and 4 bedroom dwellings and a smaller percentage of 1 and 2 bedroom dwellings.
- The average annual completion rate over the past 6–7 years has been 115 dwellings per annum. The estimated remaining capacity for new dwellings within the study area is 965 additional residential lots in greenfield and larger urban infill areas plus 575 additional multi-unit dwellings in medium density zoned areas.
- Based on the demographic and housing analysis conducted for Council, the anticipated population increase to 2051 suggests a need for at **least 1,900 new dwellings by 2051**. Background Fact Sheet 3 further notes that this estimate is constrained by current planning controls and known development approvals, rather than being based on recent development trends.
- Based on recent trends and market behaviour, the market analysis suggests that planning for growth should be based on historic development rates as this is considered more representative of likely demand. On that basis, the **potential need for new dwellings by 2051 is estimated at 3,250, or some 1,850 more homes than the current capacity can deliver.** (author emphasis)

The key conclusions of the demand-supply and affordability assessment are:

- Additional housing capacity needs to be made available within the Milton-Ulladulla study area to cater for demand to 2051.
- There will be a shift in demand towards **smaller households and greater diversity of housing types to accommodate changing household size and structure;** and

- Looking at the study area's ageing population and declining household size, there is an **increased need to plan for the provision of more diverse and adaptable housing within the Milton-Ulladulla area.** (author emphasis)

2.4 Housing affordability issues for workers

These conclusions were echoed in a community survey undertaken by Council during August and September 2021, also as part of the Structure Plan Review process. As stated in Council's Background Fact Sheet 5, the purpose of the community survey was to gain an understanding of housing demand and preferences within the Milton-Ulladulla Study Area to assist Council in better understanding how people live now and how and where they would like to be living in the future.

- The "key highlights" of the community survey as set out in Background Fact Sheet 5 includes the following: *"Taken together, the findings indicate that housing stock considered suitable for larger families is being occupied by smaller households, suggesting a reduced desire and/or ability for people to downsize to smaller homes."* (p.2)
- Of those people who intend to move, respondents aged under 60 would prefer a single detached house, while those aged over 60 indicated a desire for more diverse housing options (units, townhouses and the like).

Affordability is a major concern, especially for younger age groups attempting to enter the housing market. For the purpose of this study, interviews were undertaken (by GapMaps) with five leading businesses in Milton-Ulladulla on the topics of employment and housing availability/affordability. The businesses in question ranged across hospitality, childcare, education, aged care and professional services. Four out of the five provided feedback that the availability and affordability of housing in the area were significant constraints on their business' ability to run smoothly and/or to grow.

For the hospitality sector the challenges were reported as being particularly difficult during peak periods when such businesses require higher staffing levels. The business interviewed indicated that it endeavoured to address such challenges by acquiring residential properties to be able to offer prospective staff accommodation but that during peak periods significant challenges remained.

The aged care business indicated that the challenges were around the fact that many occupations in the sector are not highly paid, despite the fact that qualifications are required, and that housing affordability is a particular challenge for those workers, so much so that it was operating at 10%-20% below capacity as a result of struggling to attract the number of carers required/desired. The education sector employer reported that many young teachers have found the rental increases over recent years "crippling".

All of the businesses interviewed expressed the view that the provision of more housing, and especially more affordable housing, such as proposed at the Site would be highly welcome for the business community.

Also related to the questions of dwelling supply-demand and housing affordability is the issue of short-term rental accommodation, a matter addressed in Council's Background Fact Sheet 4. The Fact Sheet notes that the Milton-Ulladulla area has long been known for its tourist and visitor economy and that the tourism sector directly supports approximately 440 jobs within the Milton-Ulladulla Study Area (or about 8% of all jobs) as well as contributing further support to other industries including retail trade, accommodation and food services, all of which are very important to the local economy.

2.5 Vacancy rates

Unsurprisingly, like many other similar coastal towns and villages, there is a high proportion of unoccupied dwellings that are used as holiday homes within the study area. As detailed previously in Table 2.1, at the date of the Census of Population and Housing in August 2021 some 23% of the private dwellings in the study area were unoccupied compared with 11% for total NSW and 10% for total Australia. Further, the emergence over the past decade or so of online short-term rental accommodation platforms, such as Stayz and Airbnb, has also led to an increase in the number of homes that are used for short-term tourist and visitor accommodation, rather than being available for long-term rentals.

Council concludes in Background Fact Sheet 4 that:

'The occupancy data suggests that there may be a need to plan for more dwellings than population forecasts suggest, to allow for a proportion of homes being used as holiday accommodation and the like.'

We note that the developer intends to not permit short-term rentals within the proposed residential apartments at the Site.

2.6 Preliminary Growth Scenario

The Structure Plan Review has led to the preparation of a "Preliminary Growth Scenario" which identifies three greenfield potential growth options – all located in the Milton area – and various infill potential growth options in the Ulladulla urban area. Those infill growth options are shown on Figure 2 of the Explanatory Statement of the Milton-Ulladulla Structure Plan Review. They are described as follows:

- The Camden/St Vincent Street area, generally bounded by Camden Street, South Street, St Vincent Street and Deering Street (identified as potential medium density development area) – this is the only identified area on the western side of the Princes Highway;
- The Owens Street area which covers the two blocks between South Street, Did-Dell Street, Deering Street and Burrill Street South (identified as medium density development area);

- The Wason Street East area, bounded by Wason Street to the north, Burrill Street South to the west and South Street to the south, identified as a potential high density residential area; and
- The Ulladulla Town Centre East area bounded by Wason Street to the north, Burrill Street South to the East and South Street to the south, which is also identified as having potential for mixed use/high density residential development.

Overall, the preliminary growth scenario looks to provide a possible 66 hectares of additional greenfield land and 12 hectares of infill land to accommodate future demand. Council estimates that the potential growth options identified offer the capacity to provide between 1,450 and 1,950 additional new homes, comprising 1,200 – 1,400 new dwellings in the greenfield options and 280 – 540 additional dwellings in the infill options. Council acknowledges, however, in the Explanatory Statement, that constraints including landowners' intentions make it difficult to estimate the likely yield. Clearly, the requirement for greenfield land will increase if the development of medium density and/or high-density residential development within the identified infill areas does not proceed at an effective pace.

2.7 Restricted Availability of High Density Housing Stock

Residential density within and adjoining the town centre is also noticeably lower than what would ordinarily be expected in a major town centre. A review of ABS Census 2021 data shows (note: High density housing dwellings include flats, units or apartments in a 3 or more storey block):

- 0.3% of dwellings were high density in the MUSP area.
- 0% of dwellings were high density in Ulladulla (the suburb).

Pier32, a mixed-use development with 34, 3-bedroom apartments on the corner of Wason Street and Burrill Street South in the town centre is considered high density housing, however, on Census night August 2021, construction may not have been completed hence the above analysis. Pier32 is currently the only known occurrence of high density housing within the town centre and is considered a 'high-end' product. At the time of writing (early November 2023) there are currently three apartments advertised for sale ranging in price from \$1.095m to \$2.7m, well above the \$567k median value of regional NSW units as reported by CoreLogic Home Value Index, released in August 2023.

Whilst high density housing in the Shoalhaven LGA is markedly lower compared to regional NSW (0.2% compared to 2.9%), it is recognised that *"higher density dwellings is likely to attract more young adults and smaller households (.id)*. Ulladulla struggles to retain and attract young people but also has an ageing population and a markedly high proportion of separate dwellings.

ABS Census 2021 data also show an increase in 'Caravans, cabin, houseboat' dwelling structures which can be seen as evidence of the reality of the housing emergency.

Background Fact Sheet 3, which assesses dwelling supply and demand, confirms that no multi-unit housing has been delivered in medium-density zone areas since 2021, when Council's original supply analysis was undertaken. At present there are very few examples of medium or high-density residential development within and around the Ulladulla Town Centre. The areas identified for medium-density development outlined above are all fully developed with generally single lot housing and thus the amalgamation of sites to enable medium density development to occur is highly likely to be both time consuming and, more importantly, costly. The result is that medium density development might not be feasible in most of these areas, or at least that it might occur at a very slow rate to the extent that that it occurs at all. By contrast, the Site is in single ownership and able to be developed immediately.

As detailed in Section 1, and shown on the map provided at page 3, the Site adjoins R3 Medium Density Residential zoned land to its immediate north extending through to Deering Street which in turn adjoins the identified Camden Street/Vincent Street potential medium density growth options area. The Site can therefore be seen as a southern anchor to the identified medium density growth area on the western side of the Princes Highway and delivery of the proposed development could act as the catalyst for further medium density development within the adjoining R3 zoned land.

More directly, the proposal itself would provide a more immediate response to the housing needs of the community as expressed both through the work that Council has done in preparing the structure plan and in discussions with local businesses undertaken for the purpose of this assessment.

There is demonstrated demand for affordable housing and an appetite for diversity of housing types which the proposed development seeks to address. The proposed development would not be inconsistent with the expected land uses of the town centre and expected character of a major town centre. A mixed-use precinct will satisfy two major issues raised by the local community, a lack of affordable housing and additional job opportunities/commercial space for new businesses in white collar and service sector occupations.

Section 3: Strategic Plans and Economic Development Strategy

This section considers the Shoalhaven Local Strategic Planning Statement (LSPS); the Shoalhaven 2032 Community Strategic Plan (Strategic Plan); the Shoalhaven Regional Economic Development Strategy 2018-2022 (Economic Strategy); and the ISRP), addressing the ways in which the proposal will assist in delivering the objectives of each.

3.1 Shoalhaven Local Strategic Planning Statement

The Shoalhaven LSPS is titled *Shoalhaven 2040* and was completed in December 2020. The vision statement set out at page 15 of the document refers to three key aspirations all of which will be aided by the proposal were it to be approved. Those three are the following:

- *We have a flexible planning regime that enables economic growth and development that respects and values the natural environment and the special character of each of its towns, villages and neighbourhoods.*
- *A range of housing is provided throughout the City in well-serviced locations to meet the needs and lifestyles of residents. Affordable and accessible homes are available in the right locations.*
- *A strong and diverse economy focussed on tourism, agriculture, defence and technology, and health and education embraces innovation and is supported by a skilled workforce.*

Further, *Direction 1: Managing Economic Growth* sets out a number of planning priorities which the proposal would also assist in delivering, namely:

- Planning Priority 1 – Providing homes to meet all needs and lifestyles.
- Planning Priority 3 – Providing jobs close to home.
- Planning Priority 5 – Ulladulla Town Centre. This priority refers to the community's wish to see a more vibrant centre embracing architectural diversity and fostering innovation, creativity and greater employment opportunities. By providing additional housing and employment locations at the Site the proposal would assist in creating a more vibrant centre.

3.2 Shoalhaven 2032 Community Strategic Plan

The Strategic Plan sets the following vision for the future of Shoalhaven:

'We will work together in Shoalhaven to foster a safe and attractive community for people to live, work, stay and play; where sustainable growth, development and environmental protection are managed to provide a unique and relaxed lifestyle.'

Underpinning the Strategic Plan are four guiding principles, namely:

- Equity
- Access
- Participation
- Rights

The Strategic Plan also considers the principles of the quadruple bottom line, addressing social, environmental, economic and civic leadership considerations. The social objective seeks to strive towards everyone having access and equity to facilities and services. The economic objective seeks to maintain a strong and stable economy and ensure that the delivery of infrastructure is financially sustainable.

The Strategic Plan identifies as desirable outcomes for Shoalhaven the provisions of affordable housing and jobs close to home. The economic indicators which are set out in the plan as the tools to measure economic progress include:

- Gross regional product (GRP).
- Total number of people employed in the municipality.
- Total value of construction and complying development certificates issued.
- Number of new businesses that employ one or more people.

As detailed further below, the proposed development at the Site will assist noticeably in the achievement of the Strategic Plan objectives, in particular the social and economic objectives.

3.3 Shoalhaven Regional Economic Development Strategy 2018-2022

The Economic Strategy sets out the following aims for Shoalhaven:

- Build on the Region's strength in health and social assistance.
- Facilitate industrial development for the defence and manufacturing sectors.
- Drive tourism growth in the region.
- Invest in rail, road and electronic infrastructure to address recognised connectivity opportunities.

The Economic Strategy notes that compared to regional NSW, Shoalhaven has higher proportions of couples without children and lone person households. There are lower proportions of couples with children, one parent families, and other families and group households. The demand for a more diverse range of housing options, including smaller dwellings than the typical 3-bedroom detached dwelling, is generated by this population mix.

The Economic Strategy also notes that historically the largest industries in Shoalhaven in terms of employment have been retail trade, health care and social assistance and manufacturing, but that employment in manufacturing has declined and it is now the seventh most significant sector in terms of employment in the region. By contrast, the Economic Strategy notes that employment in the construction sector increased significantly between 2011 and 2016.

Table 3.1 below, sourced from the 2021 Census, highlights the fact that the workforce in Milton-Ulladulla is very different from the typical non-metro NSW average, with a much higher representation of white-collar employees (i.e. managers, professionals, community and personal services, clerical and administrative workers). Whereas across non-metro NSW, the proportion of blue-collar employees (technicians and trade workers, machinery operators and drivers, plus labourers) is more than half, in Milton-Ulladulla the ratio is less than one-third. There is, therefore, a proportionately greater need for additional floorspace to provide opportunities for white-collar employment than blue-collar employment in Milton-Ulladulla.

Table 3.1 Milton-Ulladulla: Jobs Available v. Workforce by Occupation, 2021		
Occupation	Milton-Ulladulla	
	No.	% of Total
Managers	700	11.9%
Professionals	1,033	17.5%
Technicians & Trades Workers	886	15.0%
Community & Personal Services	923	15.6%
Clerical & Administrative	667	11.3%
Sales	806	13.7%
Machinery Operators & Drivers	219	3.7%
Labourers	<u>670</u>	<u>11.3%</u>
Total Workers	5,904	100%
- Total White Collar	4,129	69.9%
- Total Blue Collar	1,775	30.1%

Source: ABS Census 2021

The Economic Strategy also addresses the concept of endowment-based industries for Shoalhaven, stating

“A Region seeking to encourage economic development should concentrate on the factors that enable the growth of endowment-based industries, as well as building local leadership capacity, to capitalise on the opportunities that the Region’s endowments present” (p. 6)

Endowments in this context are strengths that a regional economy possesses and can capitalise on. Included within the list of endowment industries identified for the Region in the Economic Strategy are the following:

- Location, Accessibility and Lifestyle Benefits
- Labour Resources.

In relation to Labour Resources the Economic Strategy further states as follows:

“Shoalhaven has a high proportion of vocational qualifications and part time workers. Labour supply exceeds the internal demand for labour with 11% of residents commuting to jobs outside the Region.” (p. 7).

The proposed development will leverage the above endowments by providing jobs and residential dwellings within 400 m of the Ulladulla Town Centre and will also help address the note above in the Economic Strategy.

3.4 Illawarra Shoalhaven Regional Plan 2041

The Regional Plan sets out 30 objectives, including:

- Objective 5: Create a diverse visitor economy.
- Objective 18: Provide housing supply in the right locations.
- Objective 19: Deliver housing that is more diverse and affordable.
- Objective 21: Respond to the changing needs of local neighbourhoods.

The proposal will assist in delivering each of these four objectives. In relation to Objective 5, the creation of a diverse visitor economy requires an appropriate workforce to service the hospitality industry and it is evident from all available feedback that the hospitality industry in Milton-Ulladulla faces significant challenges in attracting and retaining staff, particularly during peak periods. One of the significant challenges faced is the availability/affordability of housing for such workers.

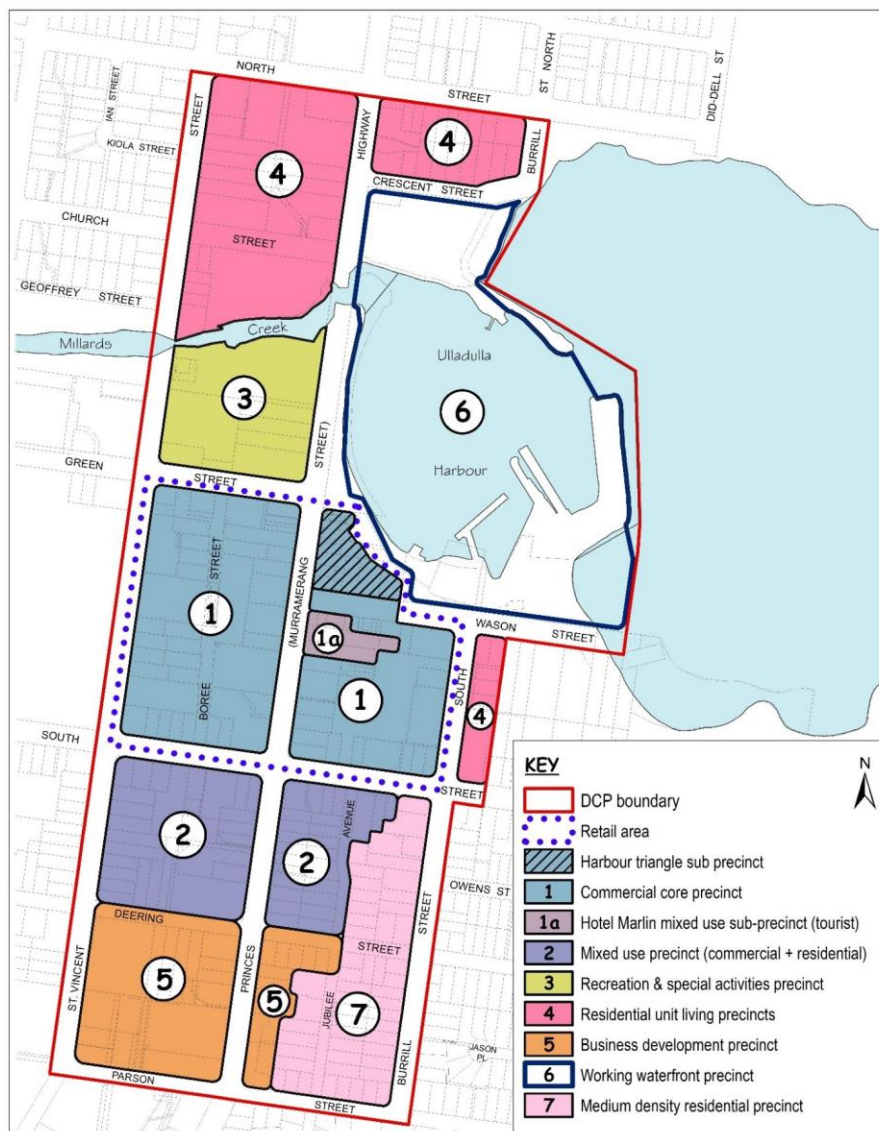
In relation to Objective 18, the proposal would provide housing supply in a location adjoining an R3 Medium Density Residential Zone and within walking distance of the Ulladulla Town Centre. In relation to Objective 19, the aim of the proposal is to deliver a more diverse range of housing than is currently available throughout Milton-Ulladulla, with a focus on smaller and more affordable dwellings. Finally, in relation to Objective 21, it is the change in the nature of the local population over time that has created an increased need for a more diverse dwellings mix and for more smaller dwellings. The proposal presents a response to this need.

Section 4: Commercial and Industrial land assessment

This section of the report provides an assessment of the current and proposed industrial zoned land in the MUSP area and commercial floorspace in the Ulladulla Town Centre.

4.1 Ulladulla Town Centre

Chapter S8 of the Shoalhaven Development Control Plan 2014 (DCP) defines the Ulladulla Town Centre and identifies a number of land uses and precincts within the town centre (Figure 4.1). This report adopts that the Ulladulla Town Centre is the 'retail area' shown by the blue coloured dots in Figure 4.1. As shown in Figure 4.1, the Site adjoins the town centre and the 'business development' precinct (orange coloured area) of the town centre.



Source: Shoalhaven Council DCP

Figure 4.1: Ulladulla Town Centre DCP area

The DCP sets out the vision for the town centre as being:

‘a vibrant mixed use shopping centre based on a maritime theme and focusing on its major asset – the harbour. It will have a diversity of business and quality residential and holiday apartments and convenient shopping which creates a place for people to work, live, meet, shop and enjoy life in an attractive, accessible, safe and sustainable environment.’

The Ulladulla Town Centre comprises approximately 11 hectares of E2 Commercial Centre and MU1 Mixed Use zoned land. Land within the Ulladulla Town Centre is predominantly used for commercial / retail uses. There are a number of low density residential sites, including single dwellings, surface carparks and vacant land within and surrounding the Town Centre.

The town centre, south of South Street and excluding the ‘medium density residential’ precinct (light pink coloured area), is approximately 12 hectares of E3 Productivity Support and MU1 Mixed Use zoned land. Analysis of the use of these landholdings shows predominantly low density commercial and retail uses, and low density residential particularly east of the Princes Highway.

Ulladulla is a major town centre however, from the analysis of supply and use of land within the town centre, it has experienced a reasonably slow uptake of development opportunities. As a result, there is limited availability of quality commercial supply in the Ulladulla Town Centre and the current streetscape is at odds with the desired vibrancy and high-quality vision of the DCP and LEP. There is around 28,000 – 30,000 sqm of retail floorspace in the Ulladulla town centre (source: Hill PDA Nowra CBD Masterplan – Market Assessment (January 2011)) and we estimate there to be somewhere between 25,000 and 30,000 sqm of commercial/non-retail floorspace in the Ulladulla Town Centre including medical uses, allied health, government services, entertainment uses, emergency services, co-working (only one premises) and other small business services in commercial offices – like real estate agents, lawyers, consultants.

A review of available commercial real estate for lease on realcommercial.com.au on 29 November 2023 shows:

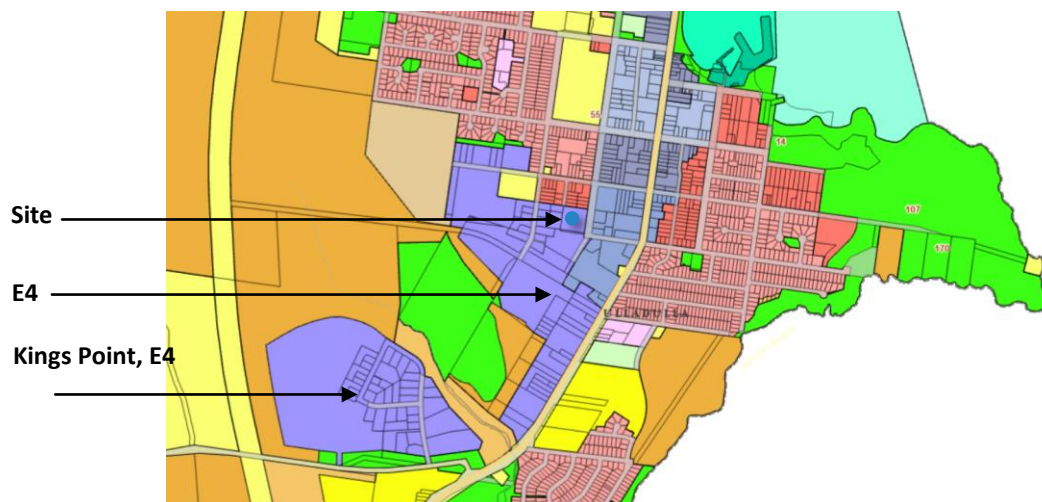
- Small spaces in The Pavilion 276 Green Street (4 available units out of 22 in total)
- 110 sqm converted residential house at 266 Green Street
- Some retail tenancies within the Ulladulla shopping centre (around 3 spaces, one F&B with frontage to Princes Road)
- 565 sq.m space in an old building at 116-118 Princes Highway
- A 51 sq.m office at 84 Princes Highway (with advertised rent of \$1,600 per sq.m, which is extremely high)

The proposed development is focused on residential uses with complementary ground floor commercial uses. This development will provide an increased residential population within walking distance of the existing town centre, supporting existing business turnover/visitation. The proposed development provides 4,710 sq.m of commercial floorspace and a 450 sq.m childcare centre that is intended to support the day-to-day needs of residents without adversely impacting the commercial viability of the Ulladulla Town Centre.

The planning proposal represents a just a fraction of the total retail and commercial floorspace in the Ulladulla Town Centre and will not include a major supermarket anchor, which is often the most contentious use, as Aldi, Coles and Woolworths already have representation in the Town Centre and the intended floorplates would not support them anyway, nor are the proposed buildings set up to facilitate supermarket delivery trucks.

4.2 Current and future provision of Industrial Land

As above, the Site is zoned E4 General Industrial and is currently a bulky goods premise, occupied by Bunnings Warehouse. To the south and west of the Site, approximately 35 hectares of land is zoned E4 General Industrial. Further south of the Site at Kings Point, an additional 34 hectares is also zoned E4 General Industrial. The total area of land in the immediate vicinity of the Site zoned E4 General Industrial is approximately 69 hectares. See Figure 4.2 below.



Source: Shoalhaven LEP

Figure 4.2: Ulladulla – E4 General Industrial zoned land

In addition, it is understood that Council is currently planning an industrial subdivision at the Ulladulla Sewerage Treatment Plant of more than 10 hectares. This will provide additional industrial land within the local area, in the medium term (5 to 10 years). As the Site is 1 hectare, this would result in a net gain of 9 hectares of available industrial land in Ulladulla and a net gain of 10 hectares of land that can support light industrial uses (as the MU1 Mixed use zone proposed at the Site permits light industrial uses).

The Site is approximately 1 hectare, representing approximately 1.4% of the current E4 General Industrial zoned land in the immediate vicinity. Analysis of the use of E4 General Industrial zoned land shows predominantly industrial (with the exception of the Dunn Lewis Centre) and light industrial uses. There is a significant area of E4 General Industrial land which remains undeveloped. See Figure 4.3 below which overlays the land zoning map in Figure 4.2 to a 27 May 2023 aerial image.



Source: Shoalhaven LEP and aerial images Nearmap

Figure 4.3: Ulladulla – undeveloped E4 General Industrial zoned land

We conservatively estimate that half of the E4 General Industrial zoned land in Kings Point alone is undeveloped. While this may be due to some constraints, the reality is that no one has developed it yet for industrial uses and take-up across Ulladulla hasn't been significant. This is also supported by the changing structure of the workforce (a shift towards white-collar occupations). Given this context, additional population in the region is likely to drive increasing demand (as a share of employment) for retail and commercial floorspace, rather than industrial land.

There is no official data on the industrial land take-up rates within Ulladulla, however the NSW Department of Planning and Environment produces an employment lands monitor. The 2022 Employment Lands Monitor showed there were 4,422 ha of employment lands across Shoalhaven-Ulladulla of which 1,275 ha were undeveloped and zoned. The average take-up rate over the prior 4 years was 7 ha or around 0.2% of all land and 0.5% of undeveloped land. Apportioning this demand across the Ulladulla industrial land based on its share of the total region's employment land supply stock or as a share of the region's workforce or share of the region's population would result in an average take-up rate much closer to zero ha per annum than 1 ha per annum. This represents a very small fraction of undeveloped zoned industrial land.

The Site currently supports a Bunnings Warehouse, which is arguably not an industrial use, rather bulky goods and thus does not contribute to industrial stock at present. Furthermore, the circumstances of the Milton-Ulladulla locality mean that alternative uses for some of the industrial zoned land need to be seriously

considered, i.e., good supply of undeveloped industrial land, a lack of affordable residential housing and not enough land in single ownership supporting medium density residential development.

In the above context, given the proximity of the site to residential uses and the town centre, we consider that a MU1 Mixed Use is an appropriate zoning, which encourages and provides a broader range of end-uses including employment opportunities.

Below is a comparison of the objectives of Zone E4 General Industrial and Zone MU1 Mixed Use.

Zone Objectives	
Zone E4 General Industrial	Zone MU1 Mixed Use
<ul style="list-style-type: none"> • To provide a range of industrial, warehouse, logistics and related land uses. • To ensure the efficient and viable use of land for industrial uses. • To minimise any adverse effect of industry on other land uses. • To encourage employment opportunities. • To enable limited non-industrial land uses that provide facilities and services to meet the needs of businesses and workers. • To allow a diversity of activities that do not significantly conflict with the operation of existing or proposed development. 	<ul style="list-style-type: none"> • To encourage a diversity of business, retail, office and light industrial land uses that generate employment opportunities. • To ensure that new development provides diverse and active street frontages to attract pedestrian traffic and to contribute to vibrant, diverse and functional streets and public spaces. • To minimise conflict between land uses within this zone and land uses within adjoining zones. • To encourage business, retail, community and other non-residential land uses on the ground floor of buildings.

Source: Shoalhaven LEP

Zone E4 General Industrial is an 'Employment Zone'. This is an important concept and as above, both the E4 and MU1 zones encourage employment. Bunnings Warehouse currently occupies the Site and supports 60 full time equivalent (FTE) jobs. As above, Bunnings Warehouse is relocating to new premises and it is assumed that the 60 FTE jobs will also relocate and may increase as the store is increasing in size. The post-completion employment opportunities generated by the proposed development, discussed further in section 5 of this report, include an additional 189 FTE direct jobs. As such, there is expected to be a net gain of at least 189 FTE jobs on site.

Section 5: Economic Impacts/Benefits of the Proposal

This final section of the report examines the economic impact of the proposal, having regard to the information set out in Sections 1 - 4 above.

5.1 Assessment of Proposal against Strategic Plan and Economic Development Strategy

As detailed at Section 1 of this report, the proposed development, if built, would deliver approximately 250 new dwellings; a childcare centre; and 4,750 sqm of commercial floorspace.

The new dwellings would be heavily skewed to 1 and 2 bedroom apartments. This additional dwelling capacity would be located ‘... close to jobs, shops and services to ensure that community needs are met’ as set out in the MUSP Explanatory Statement (17 Oct 2022). In addition, the provision of these dwellings at the Site would ensure that the infill growth strategy set out in the preliminary growth scenario will come to fruition.

The addition of smaller dwellings in the form of primarily 1 and 2 bedroom apartments, as compared to the existing stock, would assist in addressing a number of the identified concerns regarding housing supply and affordability within the study area. In this regard, these proposed dwellings would:

- Provide more diverse and adaptable housing within the Milton-Ulladulla area to accommodate the growing and ageing population.
- Provide accommodation for smaller households and a greater diversity of housing types to accommodate changing household size and structure.
- Provide a significant share of the dwellings identified as being required within the infill growth option areas, in light of the likely constraints to mixed use development in those areas as detailed above.
- Contribute significantly to the availability of more affordable housing.
- Provide alternative dwelling option for the growing cohort of empty nesters and retirees within Milton and Ulladulla.
- Enable housing stock suitable for larger families (i.e. detached dwellings of three bedrooms or more) to be occupied by larger families by providing an increased range of alternatives for people who do not need/want larger homes to downsize to smaller homes.

All of the above are identified as needs for Milton-Ulladulla in the fact sheets issued by Council as part of the Structure Plan Review.

From the point of view of the Economic Strategy, it is evident that the proposal, if approved, would:

- increase the total number of people employed in the municipality (detailed further in Section 5.2);
- increase gross regional product (detailed further in Section 5.3);
- add considerably to the total value of construction in Ulladulla (estimated \$121 million construction cost); and
- enable the number of businesses that employ one or more people to increase (via the provision of proposed commercial premises).
- make a positive contribution to the endowments of the Region identified in the Economic Strategy by:
 - i. broadening the Location, Accessibility and Lifestyle Benefits available to residents and visitors; and
 - ii. improving the options available for labour resources, both through the provision of on-site employment opportunities and the increased diversity and flexibility of housing that will be provided by the completed project, at a location close to jobs.

The proposed development would also help to deliver the objectives of the Milton-Ulladulla Structure Plan Review. The Site can be seen as a southern anchor to the identified medium density growth area on the western side of the Princes Highway and delivery of the proposed development would be highly likely to act as the catalyst for further medium density development within the adjoining R3 Medium Density zoned land.

5.2 Employment creation

The proposed development will make a substantial contribution to employment opportunities in Milton-Ulladulla. Table 5.1 below details the estimated number of jobs that will be accommodated on-site once the project has been completed, having regard to the quantum and type of employment (i.e. commercial) floorspace that will be delivered as part of the project. The floorspace is proposed to include the following uses:

- A childcare centre for 120 places; and
- 4,710 sq.m GFA square metres of commercial floorspace which is intended to be used primarily as professional offices (solicitors, accountants, real estate agents, other professional services such as engineering, plus on-site management offices and the like).

Table 5.1 131 St Vincent St Ulladulla: Proposed Development - Est. on-site job numbers			
Floorspace Type	Est. sq.m per job	GLA (sq.m)	Employment (persons)
Childcare	40	1,270	32
Commercial	<u>30</u>	<u>4,710</u>	<u>157</u>
Total	32	5,980	189
Source: GapMaps			

The future commercial mix and provision of a childcare centre will provide an estimated 189 FTE jobs. This number is significantly higher than the 60 FTE positions which are provided by the Bunnings Warehouse which presently occupies the site. As noted, it is assumed that these 60 FTE positions will be relocated, and increased in number, within the new, larger Bunnings Warehouse, so there will be at least 189 FTE jobs created by the planning proposal.

Should the site retain the existing Bulky Goods premise following the relocation of Bunnings Warehouse, the number of jobs supported is estimated to be less than 20. The potential jobs that could be supported at the Site under the MU1 Mixed Use zoning are consistent with the changing nature of the workforce towards more white collar/service sector rather than industrial/blue collar.

In addition to the long-term jobs that will be accommodated on-site once the project is completed, an estimated 514 FTE construction positions would be created over the two-year construction period as well as further spin-off benefits for supplier industries. The capital cost of the proposed development is estimated to be in the order of **\$120 million** (\$121 million, rounded).

Further, there will also be additional multiplier induced employment that will result indirectly from the project, both during the construction phase and following construction. Table 5.2 below presents estimates of the total job creation picture for the project from all phases, including construction and indirect multiplier-induced jobs.

Table 5.2 131 St Vincent St Ulladulla: Proposed Development - Est. total job numbers				
Employment Source	Direct Jobs	Direct Jobs	Multiplier Induced Jobs	Total Jobs
On-site commercial operations	189		76	264
Construction of project*		514	823	1,337
*Based on estimated construction costs of \$120 million				

Further multiplier induced employment resulting from the project is estimated to create more than 800 additional jobs during the construction period and 76 long-term jobs once the project is completed and fully occupied. Total employment creation for the region, and specifically for the Milton-Ulladulla area, will therefore be substantial.

As discussed further below, no region is self-contained with regard to economic activity since such activities are carried out both within and across regions and consumers and workers similarly travel within and across regions. Therefore, it should not be concluded that all of the employment creation resulting from the project will accrue to the Milton-Ulladulla Study Area or even to the Shoalhaven LGA exclusively. However, it can be concluded that the on-site jobs will largely be occupied by residents of the Shoalhaven LGA while many, if not most, of the construction sector jobs will also be filled by local businesses and tradesmen.

5.3 Commercial floorspace

Typically, newly available commercial floorspace can be tenanted by businesses that have previously been 'at-home' based, or in smaller premises and in need of larger floorspace, or new to the area (e.g. a local accountant moving to the area, a physio starting a new practice etc). Furthermore, the rise of the co-working sector provides greater depth of options for commercial space providers, serving the increasing digital nomad/flexible workforce. The end users of these even include workers at large businesses (who might work remotely for 2-3 days, then in Sydney for 2 days).

The commercial floorspace in the proposed development also provides an opportunity to support the new residents with potential jobs and vice versa (e.g. affordable accommodation for a childcare worker working in the centre-based childcare).

5.4 Contribution to Gross Regional Product (GRP)

Gross Regional Product (GRP) is a measure of the total value of goods and services produced in a region. The measure of GRP is typically used to monitor the size of a regional economy, as well as to promote a region's investment appeal or identify the importance of the region to the national economy.

There are many conceptual and data limitations in the construction of a GRP estimate and the Australian economy is a single, interconnected and interdependent system. As noted above, no region is self-contained since economic activities by both workers and consumers are carried out both within and across regions, therefore trying to measure the level of economic activity that occurs specifically within one region, such as the Shoalhaven LGA, is a very difficult exercise. The best that can be done is to provide an indicative estimate.

Shoalhaven Council provides extensive information on the municipality's GRP contribution, drawing on independent analysis supplied by REMPLAN. The Economic Profile for the City prepared by REMPLAN shows that:

- Shoalhaven's economy generates an estimated \$7.25 billion in GRP (2022) and provides 41,571 jobs;
- The Construction industry makes the greatest contribution to economic output in the region, accounting for 19.5% of total region output.
- Construction is also the second largest sector for employment, after Healthcare and Social Assistance, with 5,101 jobs in the sector.
- The total wages and salaries paid by businesses and organisations in Shoalhaven are estimated at \$3.782 billion (equivalent to an average of approximately \$91,000 per employee if distributed across the 41,571 jobs).

It is self-evident, given its nature and scale, that the proposed development, if approved, would add to the GRP of the Shoalhaven region. It is difficult, however, to measure the precise contribution that the project would make to GRP. That said, the provision of an indicative estimate is possible. In broad terms, there are three ways that the value of production in any economy can be measured, namely:

- by measuring the value of everyone's income (referred to as the income approach);
- by measuring the value of everyone's expenditure (the expenditure approach); or
- by measuring the value of what everyone produces (production approach).

In theory, each of these three approaches should provide the same total value of what is produced in the economy, but in practice they will differ somewhat as each method requires a different set of data and information that can be gathered at different levels of accuracy. The ABS uses all three approaches to compile its estimates of Gross Domestic Product (GDP) which is the equivalent concept to GRP but applied to the total country.

A reasonable indication of the contribution to GRP that the proposed project would make, if approved, can therefore be provided by examining the income that would be earned by workers as wages and salaries plus businesses as operating surplus plus government (as taxes on products or services) due to the project. Again, as is the case for the estimation of job creation, this income will be earned across a number of stages and processes, namely:

- the incomes that will be earned as a direct result of the project construction; and
- the wages and salaries plus operating surpluses that will be earned by the various workers and businesses accommodated on site once the project is completed.

For the construction stage of the project a reasonable estimate of the labour cost is 40% of the total cost of construction, i.e. \$48 million. Additional to direct labour costs will be the Gross Operating Surplus that will be earned by the various businesses that will construct the project, typically being between 10%-15% or, in this instance, \$12 - \$18 million.

The wages and salaries earned by the on-site employees and businesses once the project is completed will obviously depend on the final commercial uses which will occupy the floorspace. A broad estimate of employee income can be derived by applying an average wage to the estimated number of jobs (189). Adopting the current Average Weekly Earnings for the NSW workforce of \$1,388 as reported by the ABS (Cat. 6302.0 Average Weekly Earnings, Australia) the 189 on-site workers would generate total annual wage and salary income of \$14 million. The additional 76 multiplier induced jobs across the broader economy will also lead to additional wage and salary income across the economy. Again, additional to direct labour costs will be the Gross Operating Surplus that will be earned by the various businesses that will occupy the Commercial floorspace once completed, including the Childcare centre, the café/restaurant and the other commercial businesses.

GRP/GDP also includes an allowance for the income value of housing, measured as gross rents and utilities paid by renters, as well as owners' imputed rents and utility payments, thus the residential accommodation that will result from the project will also make a significant contribution to annual GRP potentially in the order of \$5-\$10 million.

Again, it is noted that not all the economic activity generated by the project will not necessarily be confined to the Milton-Ulladulla study area or the City of Shoalhaven. However, it is considered likely that a high proportion – significantly more than 50% - will be spent locally and of course the balance, even if directed elsewhere, would still be contributing to state GSP (Gross State Product) and national GDP.

In broad terms, it can be estimated that if 75% of the GRP attributable directly to the project were to remain within Shoalhaven the project will make a direct contribution to Shoalhaven GRP in the order of at least **\$45 million** due to its construction and **\$15 - 20 million** annually thereafter.

5.5 Impacts on Ulladulla Town Centre

The proposed development is focussed on residential uses with supporting childcare and commercial uses. The proposed development does not support major retail floorspace and does not threaten the primacy of the existing Ulladulla Town Centre, rather it will add to its vibrancy by increasing the number of residents accessing the services and employment opportunities provided by the town centre. The Ulladulla Town Centre contains approximately 50,000 – 60,000 sqm of commercial and retail floorspace space of which only a small fraction available for lease (as outlined earlier in this report) with many advertised premises just small commercial or small retail shop spaces (less than 100 sq.m). This low vacancy rate shows that there is significant demand for retail and commercial space within the Town Centre and that is unlikely that proposed development would

detract from the significance of the Ulladulla Town Centre. The town centre contains three anchor supermarkets as well as a wide range of supporting retail specialty stores and services. The Shoalhaven DCP (Chapter 8) shows the Ulladulla Town Centre as comprising 7 precinct areas, extending to Parson Street to the south. The Site adjoins Precinct 5 (Business Development precinct) being situated to its immediate west. The vision for the Town Centre as set out in the DCP is as follows:

The purpose of this chapter is to encourage and facilitate the vision for the Town Centre and harbour of Ulladulla as a vibrant mixed use shopping centre based on a maritime theme and focusing on its major asset – the harbour. It will have a diversity of business and quality residential and holiday apartments and convenient shopping which creates a place for people to work, live, meet, shop and enjoy life in an attractive, accessible, safe and sustainable environment.

The proposed development will add to the vibrancy of the Ulladulla Town Centre primarily by providing additional residential dwellings within close proximity to the facilities and services provided by the town centre. A limited amount of commercial floorspace will be provided by the proposed development primarily servicing the needs of the resident population of the proposed development. It is expected that new tenants within the commercial floorspace would likely consist of businesses that have previously operated from home, or businesses/workers that have moved from another region. It could include a new gym operator, new allied health practitioners, a co-working operator, local business services etc. As a result of the increased resident population and people employed within the development, it is expected that the proposed development will significantly add to the vibrancy and viability of the Ulladulla Town Centre.

5.6 Local Planning Direction 7.1

The analysis set out in this report demonstrates that the proposal will not reduce the total potential floorspace for employment uses since it will provide a greater combined floorspace (childcare centre plus some 4,710 sqm of commercial floorspace) than the existing hardware store of approximately 4,400 sqm. More importantly, the combination of childcare and commercial floorspace to be provided at the site will accommodate a much higher number of jobs (estimated at 189 FTE positions) than the existing jobs accommodated by the Bunnings Warehouse, which in any case will be relocated and increased in number within a new larger premise.

Local Planning Directions '7.1: Employment Zones' applies to the Planning Proposal for the site:

The objectives of Direction 7.1 are to:

- (a) encourage employment growth in suitable locations,
- (b) protect employment land in employment zones, and
- (c) support the viability of identified centres.

The terms of Direction 7.1 state:

- (1) A planning proposal must:

- (a) give effect to the objectives of this direction,
- (b) retain the areas and locations of Employment zones,
- (c) not reduce the total potential floor space area for employment uses and related public services in Employment Zones.
- (d) not reduce the total potential floor space area for industrial uses in E4, E5 and W4 zones, and
- (e) ensure that proposed employment areas are in accordance with a strategy that is approved by the Planning Secretary.

In regard to *Local Planning Direction 7.1*, the Planning Proposal:

- **encourages employment growth in suitable locations** – by helping create much higher density employment than currently exists at the Bunnings Warehouse use on the site as well as construction jobs and flow-on jobs across the economy;
- **protects employment land in employment zones** – by proposing a MU1 Mixed Use zone which is an employment zone that also permits light industrial uses, meaning that there is no net change of employment land that can support industrial uses;
- **support the viability of identified centres** – by providing 250 additional dwellings in the immediate vicinity of the Ulladulla Town Centre and new commercial floorspace that will bring new residents and workers into the Ulladulla Town Centre for their retail, commercial, community needs. The childcare uses will support existing and new workers in the Town Centre Local retail and non-retail businesses in the Town Centre and immediate surrounds will benefit from this additional resident and daily worker population. The new resident population on site is expected to consist of persons new to the immediate locality, creating a net increase in the spending on retail and commercial services in the Town Centre, and given the proximity, these residents would likely spend a reasonable proportion of their retail expenditure in the Town Centre. The new commercial GFA is expected to consist of businesses that are presently home based (scaling up), based elsewhere in the region or newly formed, or potentially co-working space that would include typically workers working from home. This would present a net increase in workers in proximity to the Town Centre. These workers will utilise the Town Centre for convenience shopping, lunch/coffees and retail and non-retail services.

We outline more specifically how the proposed development will achieve the objectives of Local Planning Direction 7.1 below:

Objective 7.1(a) – to encourage employment growth in suitable locations

Whilst the Site currently contains employment uses, the proposed development adds 4,710 sqm of commercial floorspace, and a 120 place childcare centre, and is estimated to support 189 FTE on-site jobs. This is significantly more than the existing Bunnings Warehouse store on the Site, which supports around ~60 FTE jobs. The positive outcomes of residential use and value of construction to the economy aside, the Site as a mixed-use development

presents significantly higher and better value than its current use i.e. more jobs and greater economic activity (greater flow-on jobs across the economy).

This objective is to “*encourage employment growth*”. Most industrial uses generate 20 to 30 jobs per hectare of site area occupied. Commercial uses generate 90 to 100 jobs per hectare (and often greater if development occurs across more than one level). Industrial uses are therefore a significantly lower employment generating use than a commercial use. The rezoning of the Site from E4 General Industrial to MU1 Mixed Use sought under this Planning Proposal would generate greater employment opportunities and economic benefits. While this argument holds true for virtually every industrial land parcel in Australia, the key issue in Milton-Ulladulla is that there are large tracts of available supply of industrial land and low levels of prevailing industrial land demand while there is a major issue in regards to affordable housing supply in Milton-Ulladulla and an observed shift in employment growth towards white collar/service sector employment.

To come full circle on this objective, the second part of the objective is to encourage employment growth “*in suitable locations*”. Ulladulla is a major town centre and is a suitable location to encourage employment. It is *expected* (author emphasis) that major town centres provide employment. This is also echoed throughout the framework of SCC’s policy strategies and plans.

Objective 7.1(b) – to protect employment land in employment zones

The proposed development protects employment land in employment zones because there is no loss of employment land or loss of opportunities for employment. A transition from one employment zone (E4 General Industrial) to another (MU1 Mixed Use) will actually *increase* (author emphasis) employment opportunities and support broader employment generation and opportunities. Under an E4 zoning, employment is limited to industrial and related industries however under MU1 Mixed Use zoning, employment is broadened to include business, retail and office alongside light industrial uses which collectively could generate more jobs than general industrial uses, noting the site currently supports Bulky Goods retail in the form of Bunnings Hardware.

Supporting broader employment industries is also in keeping with employment trends of the MUSP area including higher representation of white-collar/service sector employees (managers, professionals, community and personal services, clerical and administrative workers) compared to regional NSW.

We note specifically, Direction 7.1 (1(d)) states that a Planning Proposal should not reduce the total potential floorspace area for industrial uses in E4, E5 and W4 zones. The proposed MU1 Mixed Use zone permits light industrial uses in the Shoalhaven LEP 2014, thus there is no reduction of the potential floorspace area for industrial uses.

Objective 7.1(c) – to support the viability of identified centres

‘Identified centre’ is a defined term under Direction 7.1. As above, Ulladulla is a major town centre and its recognition as such (including recognition as a strategic centre in the ISRP), means it meets the definition of

‘identified centre’. The proposed development, by providing additional dwellings and workspaces adjacent to the town centre, will support the viability of the town centre by increasing the residential and worker populations in the area. Increased populations will bring vibrancy and foster community but will also generate business for existing businesses in the Town Centre.

The additional dwellings will support the continued growth of the region by providing a mix of residential accommodation including affordable and key workers. This in turn supports business and organisations which currently operate at reduced capacity as a result of the shortage of housing for workers. To identify housing needs and the availability of workers, we interviewed a large and diverse number of employers in Milton Ulladulla, including (but not limited to) the following:

Bannisters Hotels (three hotels in Milton Ulladulla), St. Marys School Milton, Northside Early Learning, Arcare Aged Care, Cuppitts Estate. Each of these employers identified housing affordability as the key issue they face in having the ability to employ the staff required to run their businesses at the capacity shaped by prevailing demand.

“Head office has questioned whether they’d ever go into regional NSW again based on this Mollymook experience. We have 85 beds and run at 20 – 30% below capacity, meaning a lot of empty beds despite a waiting list of over 200 elderly people wanting to get in. And that is because we can’t get the staff. And we can’t get the staff because of the [housing] crisis.”

- Sharn Tilley, former General Manager, new aged care facility Mollymook

“We have 180 families on our wait list...but we cannot offer them places because we don’t have the staff... we have staff living in either Nowra or Sussex Inlet 45 minutes drive away because there’s nowhere affordable locally for them to live.”

- Bronwyn Lowe, Manager, Northside Early Learning

Section 6: Conclusion

The economic benefits of this Planning Proposal (and thus, community benefits) significantly outweigh the theoretical loss of 1 hectare of industrial land through the transition of the site from E4 to MU1 Mixed Use zoning (which actually allows light industrial uses), and for which (industrial use) the site has not been historically used. A summary of Economic Benefits based on the indicative site layout, and associated uses including residential and affordable housing, commercial premises, and childcare is as follows:

- A net increase of approximately 250 residential apartments, accommodating an additional population of approximately ~600 people (at 2.3 – 2.4 persons per dwelling), noting that at present there is capacity within the Milton-Ulladulla for only 280 – 540 infill dwellings at present.
- The provision of around 60 affordable housing dwellings from a total of 250 dwellings, with 50 dwellings to be rented long term via the proponent's Community Housing Provider, and 10 dwellings sold to market at an affordable level for key workers and vulnerable community members;
- An estimated annual contribution to Shoalhaven LGA's Gross Regional Product (GRP) of \$18 million;
- An estimated development phase contribution to Shoalhaven LGA's GRP of \$70 million over 24 months (\$120 million construction cost);
- The proposal will include new affordable and key worker housing in proximity to employment, transport and amenities;
- The proposal will provide 4,710 sq.m of employment uses, generally expected to be commercial services and a 120 place childcare centre;
- The proposal will provide an estimated 189 permanent FTE jobs on site when completed as compared to the current site which supports 60 FTE jobs;
- Design and construction will directly provide 514 FTE jobs over a 24 month period;
- The proposal will provide an estimated \$0.6 – 0.8 million in annual rates to council;
- This proposal will increase the annual resident spend on surrounding businesses. A new population of around 600 persons would increase potential retail expenditure around \$9 - 10 million, not all of which would be captured in Ulladulla as it does not cater to all forms of retail.

Furthermore, the planning proposal would make a positive contribution to the identified endowments of the Region by:

- broadening the Location, Accessibility and Lifestyle Benefits available to residents and visitors;
- improving the options available for labour resources, both through the provision of on-site employment opportunities and the increased diversity and flexibility of housing that will be provided by the completed project, at a location close to jobs.