

Strategy 9.1	Suggest increasing scope to include education on sustainable and regenerative agricultural practices and providing assistance to land owners wanting to make the transition to diversify their land into biodiversity stewardship and regenerative agriculture. Support the Illawarra as a hub for local grown sustainable food.
Strategy 11.1	Page 46 paragraph 4 refers to land at Seven Mile Beach being mapped as Littoral Rainforest under SEPP 26; however, this SEPP has been repealed and replaced with the SEPP (Coastal Management) 2018.
Strategy 11.2	Page 48 paragraphs 1 & 3 refer to the Illawarra Biodiversity Action Plan 2011. This Action is part of the Illawarra Biodiversity Strategy 2011. It would be preferable to refer to the higher level Strategy document, rather than the Action Plan, as the Strategy is the overarching and better known document.
Strategy 11.3	Councils are unlikely to be sufficiently resourced to undertake the research required to consider the needs of climate refugia for threatened and dominant species. The lead on this needs to be DPIE (Environment, Energy & Science).
Strategy 11.4	
Strategy 11.5	Identify Key biodiversity features outside of Threatened Species and Endangered Ecological Communities. Clearly understanding that the protection of the environment requires additional features to be protected outside of these, especially individual urban native vegetation, corridors links, backyard biodiversity.
Strategy 11.6	
Strategy 15.1	Action 6 should have 'and achieve net zero by 2050' included at the end of the wording for this Action. This would make it clear how Objective 15 will be achieved, and clarify that DPIE will support the Councils in working towards the NSW net zero 2050 target.

Strategy 15.2 Councils taking the lead for Strategy 15.2 is unlikely to result in demonstrable benefits to energy efficiency. Councils LEPs and DCPs are not given sufficient legislative strength to enforce energy efficient building design for residential, commercial and industrial areas above the BASIX requirements. To ensure positive outcomes, this lead for this strategy should be DPIE (Planning and Assessment). As the BASIX system is the key framework for encouraging and enforcing energy efficiency in building design across the region, it is suggested the focus of this strategy be modified to 'Encourage energy efficient building design for residential, commercial and industrial areas by reviewing and strengthening the BASIX system and relevant SEPPs.'

Strategy 15.4 Suggest in addition to a focus on mangroves there be a focus on protection (no go zones for boats, no dredging in SG beds, water quality) and restoration of seagrass beds in estuaries as they are excellent carbon sequestrators and crucial nursery habitat.

Strategy 15.5 Suggest this Strategy include references to regenerative farming practices and expand the scope to include seaweed farming. Australia's Climate Council advises seaweed has high potential for long-term carbon storage, and seaweed farming operations are established in the Shoalhaven area.

Strategy 16.1 There are currently opportunities for using recycled products (eg glass sand from Shoalhaven Recycling), agree Councils could be using more of these products and have sustainable procurement policies. However incentives to use recycled products, or even disincentives for using virgin material needs to come from State or federal government (legislation, virgin material tax etc)

Strategy 17.1 Councils alone cannot take the lead on this strategy esp in the Shellharbour area when Sydney Water manages the water supply and infrastructure. NSW government needs to upgrade BASIX for better water storage or water recycling for new homes, more deep soil space for new developments and homes, introduce stronger legislation for developments in terms of WSUD.

Strategy 18.2 The NSW government could literally mandate sustainable housing and development

