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Illawarra Branch

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NSW Government
Department of Planning, Industry and Environment

Via email to: illawarra@planning.nsw.gov.au

Dear Sir/ Madam,

DRAFT ILLAWARRA SHOALHAVEN REGIONAL PLAN 2041

We welcome the opportunity to comment on this draft regional plan. The National Parks Association of NSW (NPA) was established more than 60 years ago with the mandate of advocating for the expansion and protection of national parks, other reserves and natural places while connecting people to nature. NPA Illawarra Branch continues to lobby for better protection status for terrestrial, intertidal and marine environments across the broader landscape of our region as well as seeking opportunities to enable people to better engage with our natural places for generations to come.

We understand that the purpose of Regional Plans is to set the overall direction for various types of government planning over a 20 year period. We would expect that big picture likely future scenarios such as population growth, economic challenges and opportunities and climate-related changes would be clearly mapped in relation to a region's specific geography. This plan discusses economic and demographic challenges to some extent but does not ground them in an adequate overview of the region's geography and environmental constraints as did earlier Regional Strategies.

We find the section Protecting Our Environmental Assets very disappointing. It is brief and general and gives only one example of an environmental issue, sand mining at Gerroa. We find Strategy 11.1 (p46) empty. It espouses principles already in planning law and regulations. The strategy should be specific to our region/s and should set clear desires for what the regions natural places should look like for generations to come.

From the Illawarra's point of view the plan needs to recognise our highly constrained setting: the extended coastline, the Illawarra escarpment and narrow flood prone coastal plain. There are high value ecological communities in all three. This setting gives rise to many regional planning challenges which we think the plan should highlight: the need to conserve the escarpment's forests and waterways, to ensure connectivity corridors between the escarpment and the coast and to protect the integrity of the varied coastal environment of beaches, estuaries and lagoons.

However we see very little mention of the escarpment and its role as a boundary and green backdrop to Wollongong. Because of many different land tenures, including state bodies NPWS, NSW Water, Sydney Water and various mining companies, it is largely out of the control of Wollongong Council. There is presently no straightforward way to govern it. NPA Illawarra spend much of our time engaged in issues affecting the escarpment such as mining in the water catchment, the management of



the Illawarra Escarpment State Conservation Area, development proposals in the foothills of the escarpment, the alarming amount of destruction from illegal activities such as mountain biking and the increasing problem of feral deer and invasive weeds. The values of the Illawarra escarpment need to be acknowledged in this plan as they need to be addressed at a cross-tenure, regional scale.

The plan uses the term 'connectivity' a great deal but often in a vague way. Of course we support increasing walking and cycling opportunities between urban centres or natural areas and longer walks such as the proposed Great South Coast Walk (<http://greatsouthcoastwalk.net/>). We have also advocated for many years for a Great Escarpment Walk to connect the Royal, Macquarie Pass and eventually Morton National Parks. We think the regional plan is the place to acknowledge such big ideas that cross local government or park boundaries.

However, we are particularly concerned that the plan should give due attention to connectivity as biodiversity corridors. It only specifically mentions the north-south corridor provided by the escarpment and catchment lands. Of greater relevance to regional planning is the need to restore and maintain east-west corridors between the forested escarpment and the coast. The coastal plain is almost entirely cleared and this is a severe threat to wildlife corridors and vegetation succession. The waterways are often degraded and eroded and may carry contaminants. Previous regional strategies have specifically named corridors such as the Yallah to Calderwood Corridor (could now link to Green Grid – Objective 14). We have had occasion to refer to the corridor several times in commenting on planning proposals. This plan does have corridor elements mapped but doesn't name specific ones or acknowledge what is required to make them functional. We suggest this must be rectified so that planning authorities will take note.

There is also little acknowledgement of the specific coastal elements in our region which likewise should feature prominently in any planning. The system of intermittently opening coastal lagoons along the Illawarra and Shoalhaven need to be acknowledged and their functioning understood. Lake Illawarra is our primary example. The entrance has been permanently opened but this has created new problems with erosion of the foreshore and enormous ongoing maintenance costs such as embankment and bridge foundation erosion. We suggest that respecting the natural functioning of these lagoons should be a paramount principle in regional planning.

We think the regional plan should properly identify the 'valued environmental lands' according to Endangered Ecological Communities and other recognised classifications. It should specify a minimum amount of each of these for full protection. For example there is no protected coastal wetland in the Illawarra. It is ironic that the foremost candidate for this is the Tallawarra Ash Ponds site, part of the Illawarra's extensive coal legacy. On the basis of bird species observed there by Illawarra Birders we think that the case for a bird sanctuary/education centre needs to be flagged in the plan for investigation.

We note that climate change and bushfire recovery are referred to throughout. However, given that this is a plan designed to apply until 2041 we don't think the measures required to address climate-related catastrophes are addressed seriously enough. Our population lives mainly in coastal settlements but the plan emphasises economic development based on ports and tourism. It does not address the prospect of sea level rise and the need for planned retreat in the medium term. This should be a clear overarching principle.

We note that the plan gives no guidance on another dilemma facing the Illawarra: the question of coal mining in the water catchment. The plan unequivocally supports the continued expansion of coal mining but also states 'protect our water resources' as a principle. Like many NSW government documents it sees no contradiction here but merely asserts that the problem can be managed. Many scientists and Water NSW disagree and urge against mine expansions. Not confronting the scale of

this and other environmental issues means this will be an ineffective plan that will not give residents confidence in how our region is being governed.

Thank you for the opportunity to comment.

Yours faithfully,

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