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Thursday, 17th December 2020

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Submission – draft Illawarra Shoalhaven Regional Plan 2041

I will refer to the draft Illawarra Shoalhaven Regional Plan 2041 in my submission simply as “the draft Plan”.

I note that the draft Plan has a number of Themes (4), Actions (9) related those themes, Objectives (30) and Strategies linked to each Objective. I have chosen to link my comments to the 30 Objectives where they are relevant to my focus which is the way that the draft Plan impacts on the Kiama LGA.

I note that I have read the submission made by Kiama Council and its associated report to the December 15 Kiama Council meeting. I will indicate at various times where I specifically support comments made by Kiama Council in their submission.

I will list all the objectives in order however make no comment in some cases as they are outside my specific focus.

Some introductory remarks about Climate Change references in the draft Plan.

I note as a positive comment that the draft Plan contains 54 matches to climate and climate change, although a small number may refer just to change, unrelated to climate. In contrast, the current version of the Plan contains just 17 matches.

It is pleasing and highly important, that climate change is given higher recognition in this draft.

In the introduction to “A sustainable and resilient region”, the opening paragraph on page 45 recognises “the growing risk of climate related impacts” followed by references to “build resilience”, “adaptation” and “mitigation”.

It is unfortunate that the opening statement does not highlight an active role for the region in “emissions reduction” although I acknowledge that the phrase does appear in paragraph 4.

That might seem to be unnecessarily “picky”, however I think it is important that a climate change and emissions reduction focus is embedded in the Plan as a top priority.

The Forward (page 4), from the Minister, mentions climate change on one occasion and that is in relation to “responding” to climate change.

The Introduction (pages 5-8) does not specifically mention climate change at all but does reference the detailed Sustainability Plan, “A Regional Approach to Sustainability in the Illawarra Shoalhaven” as one of the principal documents underpinning the Regional Plan.

The Vision (page 10) does refer to a “low-carbon economy”, “a global hub for clean energy” and “generating energy from local renewable sources”.

In summary, despite the detailed Sustainability Plan underpinning the draft Plan, I would like to see the final Plan document have Climate Change much more visible in the Vision and introductory statements as it will be the driver for much of what happens between now and 2041. I would also like to see mention of active emissions reduction programs and strategies sit next to the adaptation and mitigation strategies.

I believe this is important as most people reading the Plan will not delve into the background documents.

A PRODUCTIVE AND INNOVATIVE REGION

Objective 1: Strengthen Metro Wollongong as a connected, innovative and progressive City

This objective is outside my main focus, however as Wollongong grows, connectivity, innovation and progressive development will be of significance to the region as a whole.

As an example, whilst cultural development is very important for the whole region at a local level, it is important that regional centres can provide the facilities and opportunities for those cultural events and programs that cannot be accommodated with smaller local facilities and available funds.

For regional visitors to Wollongong, who might enjoy the cultural activities provided by a large centre, connectivity within Wollongong and between Wollongong and the rest of the region is very important. Travel to and from Wollongong may involve an hour or more of travel by road or train, so the least time spent in getting around the city to venues, finding parking etc the better. Whilst ever visitors are feeling comfortable about access to and travel within the city, venues will attract more regional visitors.

Objective 2: Grow the region's Regional Cities

This objective is outside my main focus

Objective 3: Grow the Port of Port Kembla as an international trade hub.

This objective is outside my main focus

Objective 4: Activate regionally significant employment precincts to support new and innovative economic enterprises

Whilst Bombo Quarry lands have their own Objective 20 and are not formally listed as a "regionally significant employment precinct" there is no reason why the strategies associated with Objective 4 should not apply to parts of the re-development of Bombo Quarry.

I note the comments in the Kiama Council submission

- We do wish to provide a proposed change to the plan which has not been highlighted in our previous discussions and this relates to the Bombo Quarry. Whilst we acknowledge that the requirement within the plan is to create a community and Council vision for the site, we would like to ensure that emphasis remains on the needs for commercial opportunities to be included within this future vision. Given the limited commercial growth opportunities available within Kiama, it is important for emphasis to be placed within the plan that provides the opportunity for economic growth to secure jobs for our community in the future.

Strategy 4.1 for example suggests:

“Support new and innovative economic enterprises in local strategic planning and local plans by:

- *retaining and managing regionally significant employment lands and safeguarding them from competing pressures,*
- *providing flexibility in local planning controls,*
- *aligning infrastructure to support the rollout of employment land in the region.”*

It would be valuable if the final plan acknowledged the role that protection of part of the Bombo Quarry redevelopment as employment land might have. It would also be important for the final plan to support the Council in making local planning controls for the re-development of the area that “supported new and innovative economic enterprises”.

Objective 20 seems to promote a “shared vision” just within the Kiama LGA, whereas recognising the potential of the Bombo lands within Objective 4 connects the area with the whole region. There are many new and innovative areas of the economy which are not reliant on a large total area of land but which can benefit from infrastructure associated with the so-called “smart economy” based around internet services etc.

I will mention under Objective 20 other possibilities for Bombo which meet the Objective 4 strategies. Acknowledgement under Objective 4 may open the doors to funding opportunities and greater regional integration for commercial enterprises in Bombo.

Objective 5: Create a diverse visitor economy

Kiama LGA is very much part of the regional visitor economy. Strategy 5.1 mentions:

Create an environment for a diverse visitor economy through local strategic planning and local plans by:

- *enhancing the amenity, vibrancy and safety of centres and township precincts,*
- *creating green and open spaces that are accessible and well connected and enhancing existing green infrastructure in tourist and recreation facilities,*
- *supporting the development of places for artistic and cultural activities,*
- *protecting heritage, biodiversity and agriculture to enhance cultural, agri and eco-tourism,*
- *supporting appropriate growth of the night-time economy,*
- *providing flexibility in planning controls to allow sustainable agritourism and ecotourism,*
- *improving public access and connection to heritage through innovative interpretation,*
- *incorporating transport planning with a focus on active transport modes to connect visitors to key destinations.*

There is no doubt that most of these points are relevant to the Kiama visitor economy, however I remain concerned that they also provide access for the trojan horse that could “kill the goose that lays the golden egg”.

It is important that the visitor economy is based on “sharing the life that we live in Kiama LGA, NOT changing the way we live”.

I make the following comments (some positive and some negative) about some of the above dot points to illustrate my concerns.

DP2: There is obviously interest in using the environmental assets of the LGA to support the visitor economy. No doubt that interest will manifest itself in projects that have the potential to reduce free public access to areas which have traditionally been available to the community.

There could also be projects that effectively privatise previously identified “community land” by recategorizing the land as operational and then on-selling the land for the establishment of eco-tourism facilities. For example the area known as Jerrara Dam is an underused jewel in the passive recreation opportunities for Kiama residents but is in the sights of those who would like to sell it for budgetary reasons and using the “eco” label to somehow cover up the “privatisation”.

DP3: As mentioned in my comments to Objective 4, the Bombo lands provide an excellent opportunity for supporting the development of places for artistic and cultural activities. The “Kiama Epicentre Project” designed to create a large festival complex, actually meets many of the Objectives of the draft Plan and would have regional significance as well as providing a wonderful opportunity for enhancing the local visitor economy.

DP4 and DP6: Whilst this is an excellent component of strategy 5.1 it requires significant clout in legislation at a State level as well as legislative support for Local Government actions. Unfortunately, that does not seem to be the case. I will illustrate my concerns with several examples.

In the case of protecting heritage or local character through the development assessment process, the downgrading of Development Control Plans to an advisory role has made it extremely difficult for Councils to strictly apply DCP controls. Virtually every DA now comes with the comment “The DA is **generally consistent** with the Kiama Development Control Plan 2012.”

The degree of variation from the standards can be considerable through multiple smaller inconsistencies. It is often these details that capture local character.

The local protection of biodiversity is often undermined by State Government legislation such as the recent introduction of the “Biodiversity Conservation Act 2016” which has seen a significant increase in tree clearing in NSW and has introduced the concept of “self assessment” in place of professional assessment. Rural vegetation is no longer under the control of the local Council and is subject to the State legislation which can be less stringent than what may be needed to meet local Council policies regarding biodiversity protection.

On the other hand, the approach to urban vegetation can be based on the whim of Councillors whose interest is less in biodiversity and more in local politics. The vandalism along the coastal dune vegetation in favour of resident’s views of the sea is a growing issue in Kiama as elsewhere.

The mapping of regionally significant agricultural land has been promised for years. It was supposed to provide evidence of the value of farmland in the face of applications for rezoning for residential subdivisions. The KLSPS is reliant on that mapping to finalise the Kiama Housing Strategy.

Kiama LGA has already suffered from an absence of objective evidence about the significance of agricultural land through very free and liberal interpretations of the old Kiama Urban Strategy supported by the options provided in NSW Planning Legislation for the developers to bypass local Councils and take their zoning intentions straight to the Department of Planning.

Planning Legislation has also allowed a very flexible use of the phrases “eco” in “eco-tourism” and “agri” in “agri-tourism”. Too often they are a cover-up for developments that actually undermine the intent of this dot point.

There are local examples of “farm stay” on properties where there is no active agriculture taking place.

Whilst these dot points represent a great set of options, State Government legislation actually often undermines the local communities and changes the way that they experience the area in which they live. These changes are also not necessarily in the interest of a sustainable visitor economy.

Objective 6: Activate the region’s harbours to promote the blue highway

I support this objective and its associated strategy however, in line with my concerns about the “visitor economy” generally, I am concerned that over commercialisation of the locally very popular harbour area will significantly restrict the recreational opportunities available to the local community.

I note that the Kiama Harbour Revitalisation Framework “will guide investment in Kiama Harbour and improve the marine experience for maritime users and the broader community.” Further it is expected to form the model for future harbour redevelopment in NSW. It is therefore fundamental that Kiama’s harbour revitalisation balances the opportunities for visitors and the continuing needs of locals. The potential for over commercialisation of harbour areas is not limited to Kiama and therefore the revitalisation of Kiama Harbour can set the scene for maintaining the rights of “locals” as other harbours along the NSW coast are “revitalised”.

Wollongong and Shell Cove will obviously fill the role of “high level” visitation options for the South Coast with Kiama having a “lower level” role in the so called “Blue Highway”.

Objective 7: Respond to the changing nature of retail

I support this objective as it is important that retail responds to the dramatic changes taking place. I note however that despite the digital nature of much of the change, this objective recognises the role of public spaces in new bricks and mortar retail development. I support the comment that “Retail studies should align with town centre studies to promote public domain design measures to enhance centre activation and a vibrant street life.”

Too often recent redevelopment of retail precincts has been dominated by associated residential components, invariably challenging the existing planning standards, and invariably arguing that the retail redevelopment is only financially viable if the often “over the top” residential development component is approved.

In so many of these situations, the public domain is devalued.

Whilst Strategy 7.1 seems to provide “flexibility” it can be read two ways with the “opt out clause” – “unless there is no other site etc etc”. Too often that sort of clause is used to ignore the main principle and is the “go to” justification for cheaper proposals in new locations that disturb even more communities with increased traffic and competition for local “corner store” type retail.

Strategy 7.1 will require more robust planning legislation to remove the “opt out” opportunities and more strictly embed respect for the public domain and enhancement of public areas.

Objective 8: Strengthen the economic self-determination of Aboriginal communities.

I support this objective and its associated strategies. I note however that all of the strategies, 8.1 to 8.4 have State Government Departments as their lead agencies. They are all strategies that have come up against significant bottlenecks and resistance to change over the decades.

Objective 9: Promote agriculture innovation, sustainability and value-add opportunities.

I support this objective and its associated strategies however I wonder how much progress has been made in this area since the previous manifestation of this Regional Plan.

I note the reference to DPI mapping of the important agricultural land across NSW. This was nearly identical to the statement made 5 years ago, however nothing seems to have happened in the meantime as far as Kiama LGA is concerned.

Kiama has recently had a number of Planning Proposals for residential development on agricultural land. Whilst the current agricultural land classification system has provided some basis for determining the potential losses of quality farmland, the promised mapping would provide an extra layer of information.

Kiama Council was unable to include such mapping in its recently adopted Local Strategic Planning Statement despite the promises dating back 5 or more years. There should be a stronger statement within the Regional Plan regarding this matter. I believe that there should further be a more detailed local mapping project which refines the detail in the proposed “regionally significant” mapping as I worry that the fact that land which does not get a mention in the regional mapping, may still have significant value at a local level but be ignored. If the only reference point is the regional mapping, we may see lots of good quality land sacrificed.

There should be a publicly available mapping project which includes overlays of the “regionally significant agricultural land” and the existing 5 level agricultural land classification to be used when assessing agricultural land values.

I note that the draft Plan identifies the farmland of Jamberoo, Gerringong and Kiama as important for both residents and tourists in setting a background for locals and visitors. It should be highlighted that the fields are only going to be green and “attractive” when there is viable agricultural activities taking place. While ever that land is seen as a land bank for future residential subdivision, the price of the land will be out of the range of anyone wanting to buy it for food and fibre production.

There needs to be a strategy as part of Objective 9, to provide long term protection for these valuable lands. The protection should be designed to remove from them the opportunity for rezoning so that the price reflects the land farm use options.

Objective 10: Sustainably maximise the productivity of resource lands.

Despite the lands marked on the map (page 42), I note that the draft Plan only makes specific reference to the hard rock resource lands at Dunmore and Kiama and the sand deposits along the Shoalhaven River. There is no mention of the sand deposits at Gerroa or Dunmore, the mining of which have been, or will be, the source of considerable conflict with the environmental attributes of those sites.

Whilst these two sand resources are not being listed under this Objective, I note a reference to the Gerroa resource under Objective 11 – see below.

Strategy 10.2 attempts to provide an opportunity to both protect environmental values AND provide certainty for extraction activities.

In the case of these sand deposits, there is no win-win outcome. To date there has been little respect paid to the environmental values that underly the sand deposits and even where courts have ruled in favour of extraction the beneficiaries of the extraction have been quite slack at implementing the so-called offsets placed as conditions by the courts.

It is really important that the final Plan develops new strategies which truly reflect the ecological values of rare and important biodiversity landscapes. To date there is scant evidence that extraction will ever take second place to environmental values.

Part of the approach to resolving extraction conflicts is to find alternatives to the extracted material. In the case of sand, in conjunction with the “circular economy” concept, sand equivalent derived from other waste materials can replace a certain proportion of the extracted material helping to reduce the pressure on the high value environmental assets.

More effort and research should be placed on achieving this end.

A SUSTAINABLE AND RESILIENT REGION

Objective 11: Protect important environmental assets.

I fully support this objective and its associated strategies.

As is the case with some other objectives, Objective 11 and its strategies are undermined by State legislation which often prioritises the actions which impact on environmental assets. It is difficult to feel confident that there is any line in the sand in regard to protection of biodiversity values that cannot be overcome because of economic imperatives.

For that reason, I wonder what has actually changed or improved as a result of similar statements made in the current Plan.

I note in particular the reference to mapping of high environmental value lands and support the continued development of this resource. These maps will be fundamental in implementing Strategy 11.1.

The land at Seven Mile Beach referenced under this Objective is highlighted for its inherent biodiversity values and its role as part of the corridor between Seven Mile Beach and Barren Grounds Nature Reserve. The draft Plan recognises that extraction would have “considerable impact on this sensitive habitat and ecological link”. Nevertheless, there has been a long history of action by the local community needed to try and preserve this area.

If a Regional Plan makes this sort of assessment of the value of an area, why are there not actions in place to permanently protect it? This is an example of the gap between words in the Plan and legislation to implement those words.

The draft Plan refers to “Councils considering how impacts can be managed or offset through planning controls or other environmental management mechanisms”. Where the impacts are affecting identified regionally significant environmental assets, it should not be left just to local Councils to sort out the conflicts. They should be provided with the legislative tools to make this happen. Too often they are not available.

I note that Objective 11 calls for the “avoid, minimise and offset” hierarchy to be applied to areas identified for new or more intensive development. Too often, the offset mechanisms are unable to be resolved using a “like for like” offset. The offset process allows further flexibility through “like for unlike” transactions which by their very nature can result in the total loss of important local environmental assets. Yet another example of the “words versus actions” problems when it comes to environmental protection.

There should be legislative provisions to only allow “like for like” transactions in the situations where high environmental value lands are being impacted and in the absence of stronger legislation that re-establishes the “red flag” concept.

I note there are plans to update the Illawarra Biodiversity Action Plan 2011 to incorporate the Shoalhaven. I support this action and its potential to recognise broader biodiversity corridors and to develop common strategies across the whole region where those strategies improve the overall protection by “raising the bar” where an LGA needs to improve their local policies.

I support Strategies 11.2 and 11.3.

I support Strategy 11.4 and its intent to recognise and conserve the biodiversity value in and adjacent to newer urban release areas.

I support Strategies 11.5 and 11.6. In particular I note the references to Spring Creek and Werri lagoon in the Kiama LGA as “Sensitive Estuaries”. In both cases a recognition of the role that catchments play in the ultimate health of the estuary should be embedded in the Plan and legislation that supports the Plan strategies and Objectives.

Objective 12: Build resilient places and communities.

I fully support this objective and its associated strategies.

I note in particular Strategy 12.3 and the comment in Objective 12 that “Management of coastal areas must protect homes and infrastructure as well as natural shorelines and beaches. It can be argued that in many cases these are one and the same thing. I believe that it is important to develop regional wide approaches to the management and protection of dunal vegetation in recognition of its role in protecting natural shorelines and the homes which are adjacent to the shorelines.

There is a serious problem along the coast, in all LGAs, of destruction of vegetation in the interest of enhancing views from homes behind the beaches. Individual councils have their own policies in this matter, often based on the whim of a Councillor or two, independent of the established science of the role that coastal vegetation plays in the protection of dunes.

It is long overdue for Councils to adopt best practice, objective scientific principles to apply to the management of coastal vegetation and comprehensive community engagement on that matter. I believe that the responsibility for developing the guidelines should lie with the State working with the regional Councils.

A separate dot point to this effect, under Strategy 12.3, would be most appropriate.

Objective 13: Increase urban tree canopy cover.

I fully support this objective and its associated strategy.

I note that Kiama Council is developing an Urban Greening Strategy in line with this Objective.

Objective 12 refers to “Challenges to extending urban tree cover ...”. The Objective should provide strategies to ensure that major residential developments should have minimum lot sizes and boundary offsets restricted in order to facilitate the planting of suitable vegetation. The very nature of some of the large residential development makes it impossible to have any plantings which would increase urban tree canopy cover.

Objective 14: Enhance and connect parks, open spaces and bushland with walking and cycling paths.

I fully support this objective and its associated strategy.

Whilst this Objective and Strategy 14.1 refer to new urban release areas and open space within those release areas, it is equally important for those new communities to have access to other natural areas, outside the release area, for recreation and within easy travel distance from it.

Councils should ensure that their communities have access to a variety of such areas, and it would be beneficial to provide a database of what areas are within easy travel distance from established residential areas. Particularly when those areas are available community land.

Councils should ensure that residents have permanent access to these areas.

In particular, Kiama Council should make sure that areas such as Jerrara Dam are retained in community ownership, established as a place of passive recreation and not commercialised and sterilised from public use. Maintaining these areas as well as the open space within the release areas is important from a community mental health perspective.

Objective 15: Plan for a Net Zero region by 2050.

I fully support this objective and its associated strategies.

I note the NSW Government’s “Net Zero Plan Stage 1 2020-2030”.

I note the very detailed Sustainability Plan - A Regional Approach to Sustainability in the Illawarra Shoalhaven.

As I have mentioned before, I believe that this response to climate change will be a driver, directly and indirectly, for many of the outcomes from this draft Plan. It should therefore feature much more significantly in the Introduction and the Vision statement for the draft Plan.

Strategies 15.1 and 15.2 both begin with the word “encourage”. It is my opinion that the approach should be more forceful than that. The time for debate about climate change has passed. The science is in. I believe that it is time to be prescriptive about what these strategies should be.

For example, 15.2 should involve prescription of new energy efficiency standards. The old arguments that they are too costly, are no longer relevant given the fact that longer term savings are significant, and quality of life benefits accrue from the energy improvements resulting in better health outcomes etc. It is well documented.

Objective 16: Support the development of a circular economy.

I fully support this objective and its associated strategy, and I note very positively the many references in the sustainability plan to the “circular economy” concept.

In regard to Strategy 16.1, there should be a reference to investigating the opportunities for “closing the loop” in a way that allows alternatives for scarce or conflict creating resources such as sand as I indicated in Objective 10.

Objective 17: Secure water resources.

I fully support this objective and its associated strategies. As in my comments regarding Objective 15, I believe that the word “encourage” should be replaced with “prescribe”. The text supporting this objective is sufficient argument to support that change and provide the basis for legislative change to achieve the outcomes.

A REGION THAT VALUES ITS PEOPLE AND PLACES

Objective 18: Provide housing supply in the right locations.

I support the comments from Kiama Council in regard to new housing locations and numbers. An extract from the Kiama Council submission on this matter is:

- Council supports the changes to the plan that have provided a more regional focus rather than specific dwelling targets and which has allowed for priority to be placed on existing greenfield growth areas in Shoalhaven, Wollongong and Shellharbour, acknowledging the significant constraints that are faced within the Kiama Municipality. Council is supportive of the removal of any numerical population/dwelling projections from the draft Regional Plan, as this has been a point of conjecture for some time. Council look forward to collaborating with the Department in preparing our Local Housing Strategy in the near future.

In regard to the matters raised by Kiama Council I support the more regional focus and the identification of the regionally significant growth areas of West Lake Illawarra and Nowra-Bomaderry. I support the statement under Objective 18 that “Kiama is only likely to play a supporting role in regional housing supply and a limited supply of new greenfield areas.

In recent times, the numerical population/dwelling projections attached to a number of different overlapping timelines, with little accurate baseline data and a lack of accurate data about the numbers of dwellings, dual occupancies, units being delivered, made it very difficult to accurately assess if targets were being met. This lack of certainty was taken advantage of by proponents of new greenfield proposals.

In Kiama, a detailed assessment in the early 2000’s, of the appropriateness of many greenfield sites for residential development, resulted in the Kiama Urban Strategy. Although the Strategy, finally adopted in 2012, was made a requirement to accompany the Kiama LEP 2011, it became a guide only with a series of Planning Proposals being lodged against the spirit and wording of the strategy and supported by the Council.

Hopefully the proposed Kiama Local Housing Strategy, to be developed in conjunction with the Department (Collaboration Activity 4), can involve the same depth of objective analysis that led to the Kiama Urban Strategy, but with a more robust implementation strategy based on certainty and accurate up to date information.

I note also that the documentation refers to the Kiama Local Housing Strategy as “responding to changing housing needs, **in line with the community’s vision.**” Kiama Council will be able to provide details of the community’s vision following a series of public consultation processes during

the development of the Local Strategic Planning Statement as well a decade or two of relatively uniform attitudes to the provision of new dwellings in the LGA.

Part of the confusion in the last decade about the provision of new dwellings in Kiama has come from uncertainty about the future of Bombo Quarry (The subject of Objective 20). The Kiama Urban Strategy projection for dwelling yield from Bombo was far less than was recognised later on and the time-line for closing of the quarry also led to uncertainties about whether the existing targets would be met in time. This meant that some Planning Proposals argued they were needed to fill a shortfall even though it was recognised that Bombo would more than fill the gap, just a few years later.

Hopefully the Local Housing Strategy will prevent these uncertainties.

Strategy 18.1 relates to the identification of growth boundaries. The southern boundary of Gerringong has long been a major issue for Kiama LGA. The community vision was very firm in that there would be no more development between the existing southern boundary of Gerringong and the northern edge of development of Gerroa.

That vision was always challenged by the refusal of the Illawarra Shoalhaven Urban Development Program to remove the farmland between Gerringong and Gerroa from its database. That removal was requested by numerous versions of Kiama Council going back several decades.

The draft Plan now provides the basis for downgrading that land as future residential land or preferably removing it altogether.

An early statement supporting Objective 18 on page 62 makes it clear that “Wollongong, Shellharbour and Shoalhaven have sufficient supply of housing identified to meet demand to 2041. Surely the time has come to remove Gerringong-Gerroa from the database and take away the sense of the area being in a holding pattern until the inevitable. The result of that situation is that the land will always be valued according to its residential value, not its agricultural value and there will be less incentive to meet Objective 9 which promotes agricultural sustainability and value-added opportunities which take advantage of the high quality soils in that area.

Objective 18 also refers to the challenge of infill development in Kiama and Gerringong. Strategy 18.2 hints at a number of matters that should be addressed to gain community support for this. There has not been a very sophisticated approach to infill development in Kiama, with multi-unit designs being less than popular and doing little to preserve sightlines and allow for urban greening possibilities.

Although Strategy 13.3 refers mainly to the major new release areas, increased infill and increases in visitor numbers as a result of the growing visitor economy will see significant effort needed in Kiama to ensure that parking and traffic issues are accommodated. Accommodating these matters may involve new parking infrastructure and traffic flow strategies. There are strong links between traffic chaos and the health of a community.

Strategy 13.4 is supported so that the data required to properly establish and implement the Kiama Local Housing Strategy is available. I note that the Website of the Illawarra Shoalhaven Urban Development Program has recently been upgraded with data much more easily accessible. It will just be important that the data itself is regularly updated.

Objective 19: Deliver housing that is more diverse and affordable.

I fully support this objective and its associated strategies.

Strategy 19.1 is to be supported, however once again it is difficult to see how “encouragement” will achieve the desired outcome. To date the housing mix provided by the building industry is dominated by the profits that can be accrued. Often a different mix will reduce profits and different Councils have different levels of resources to support the “encouragement”.

If the encouragement is in the form of variations to standards such as FSR, building setbacks etc they will still have to demonstrate that they do not impact on local amenity to gain community support. The issues of diversity and affordability should be part of the detailed discussions leading to the Kiama Local Housing Strategy so that it is not necessary to try and implement these ideas as an add on.

In that regard Action 8 is very strongly supported as is Strategy 19.2.

It has been encouraging to hear a number of State Governments begin to tackle the shortage of social housing. Strategy 19.3 is strongly supported as a local contribution to what is a nation wide problem.

Objective 20: Establish a shared vision for the future of Bombo Quarry lands.

I strongly support Objective 20 and its associated Action 9.

I have previously noted that seriously assessing the role that Bombo will play in the Kiama Local Housing Strategy is a breakthrough in achieving some certainty about new dwelling opportunities in Kiama LGA which meet the need for diversity.

I also made references in Objective 4 to determining the opportunities for some of the Bombo redevelopment supporting employment.

Later in Objective 24 I will comment on the possibilities for Bombo land to support major events and cultural activities. See details below

The integration of employment land, support for major events as well as a significant contribution to new dwellings makes the establishment of a “shared vision” a necessity.

There is the possibility that the current owners of the land comprising Bombo Quarry will all want their “pound of flesh”, most likely achieved by maximising the residential outcomes at the expense of retaining some employment land and developing spaces for major events.

It is very pleasing to see that the draft Plan indicates a number of considerations which should be part of the development of the shared vision. They cover the issues that I have raised above.

I believe that there will be need for a master plan for the whole area which demonstrates how the competing land uses can be accommodated and which will allow for the landowners to each share in the financial rewards without consideration of how their particular land is finally utilised. This may well be difficult, in that it requires a number of large entities to work together, however I believe that this is so important that it should be not just encouraged, but legislated, in some way.

Hopefully such an outcome can be achieved through the collaboration of the NSW Government, with Kiama Council, the landowners and the community as identified in the draft Plan.

Objective 21: Respond to the changing needs of local neighbourhoods.

I fully support this objective and its associated strategies.

Objective 22: Embrace and respect the region's local character.

I fully support Objective 22 and its associated strategy.

I note that this objective is supported by Strategy 22.1 which calls for the development of local character statements (in accordance with the Local Character and Place Guidance).

I am aware from past experiences that capturing "local character" is itself not an easy task. In regard to rural statements, there is so much tied up with local character that is often associated with the setting of the area subject to the statement. Protecting local character can therefore be a matter of protecting the setting. The obvious Kiama LGA context is maintaining the separateness of the villages and townships. That is firmly stated in Kiama's Local Strategic Planning Statement and supported by the draft Plan.

In the urban context, whilst Councils are being encouraged to produce local character statements to inform their local strategic planning and local plans the more difficult task is to then embed those statements into planning instruments in a way that will work. Most such statements would find their way into Development Control Plans which are simply advisory and often challenged by developers.

I believe that considerable assistance needs to be given to Councils to establish Local Character Statements that are transferable to DCPs and then supported during the development assessment process.

Objective 23: Celebrate, conserve and reuse cultural heritage.

I fully support Objective 23 and its associated strategy.

In terms of pre-European cultural heritage, I think that there is a very poor record of observance of the actions identified in Strategy 23.1.

Further, I think that there has been much lip service paid to celebration and conservation of Aboriginal heritage.

Having said that I hope that the draft Plan Objective 23 is successful in raising the profile of an appropriate relationship with Aboriginal cultural heritage.

Objective 24: Support major events, public art and cultural activities.

I fully support Objective 24 and its associated strategy.

In terms of Kiama LGA, the redevelopment of the Bombo Quarry provides an excellent opportunity to establish an area specifically designed to support major events such as festivals and other cultural activities. There is already the beginnings of a concept for the Kiama Epicentre which will achieve the goals of Objective 24. It has the potential to support most of the actions listed in Strategy 24.1.

See: <https://thebugleonline.com/2020/11/12/big-festival-vision-for-bombo-quarry/>

And: <https://www.illawarramercury.com.au/story/7014124/how-bombo-quarry-could-become-the-illawarras-next-entertainment-precinct/>

The project has the advantage of being adjacent to the Bombo railway station, just off the Kiama Bypass, within walking distance of the township of Kiama.

A SMART AND CONNECTED REGION

Objective 25: Collaborate to leverage opportunities from Western Sydney's growth.

I note that the Western Sydney and Illawarra Shoalhaven Roadmap has just three references to Kiama and all three are simple listings of Kiama as part of the area involved in the Roadmap. The Roadmap covers a very large area, involves a large population and very major projects.

It is my concern that Kiama will be buried under the changes that will occur in order to facilitate the "Opportunities from Western Sydney's growth". In particular the "Visitor economy" has the possibility of overwhelming the Kiama LGA to the extent that the very qualities that make Kiama LGA a focus for the "visitor economy" and a place of great attachment for the local residents will lose its attractiveness to both visitors and locals.

I would like those that will be implementing the roadmap to respect and maintain the qualities of the Kiama LGA that are reflected in some parts of this draft Plan. That will require all four Councils in the region to support the integrity and qualities of Kiama LGA that contribute to the Region's character and important values.

Objective 26: Create faster rail connections Wollongong and Nowra

I fully support this objective and its associated strategy. I note that one of the identified routes is Sydney to Wollongong-Bomaderry. I would like to see further work being done on a rail crossing of the Shoalhaven River. The new bridge currently being constructed completely missed the opportunities to extend rail beyond Bomaderry. An extension of rail south of the Shoalhaven opens up enormous opportunities for freight to and from the south which would have long term impacts on the need for road transport with its associated road costs and impacts.

It makes no sense that there should be a developing industrial area to the south of Nowra that cannot directly use the rail network that terminates at Bomaderry.

Objective 27: Protect major freight networks.

I support this objective and its associated strategy however "balancing" the negative impacts of freight networks with supporting efficiency of those same networks will be a matter of detail not available in the plan. I note that there is concern that the freight network is to be protected from the "potential encroachment by the expansion of residential areas".

Hopefully the protection of important agricultural land will receive the same degree of support.

Objective 28: Create connected accessible walking and cycling networks.

I fully support this objective and its associated strategies. The incredible success of stage 1 of the Kiama Coastal Walking Track is a testament to the demand for this sort of opportunity. I note that Kiama Council has recently supported the long-awaited stage 2 of this project, linking Gerringong with Gerroa. Funding, beyond the capacity of the Council, will be needed to acquire land to complete access. Some infrastructure, protecting walkers in the vicinity of the Gerringong Golf Club, will also be needed to provide access to the Stage 2 track from Fern Street. This project is significant at Regional, State and National levels and should be strongly supported.

There is also need for cycleway funding to connect the Kiama Cycleway Plan with the southern area through the provision of cycle lanes through the south Kiama bends. The long term objectives have been to connect the Kiama cycleway network with the Shoalhaven area via Shoalhaven Heads.

Objective 29: Utilise smart infrastructure to drive resilience, prosperity and vibrant places.

I fully support this objective and its associated strategies.

Objective 30: Prepare for mobility changes that improve connectivity and sustainability.

I fully support this objective and its associated strategies. Whilst you reference the DPIE and Councils as lead agencies for implementing Strategies 30.1 and 30.2 there is a great need for policy leadership from the Federal Government. I would like to see lobbying for federal policy changes and funding to support these initiatives.

Thank you for the opportunity to comment.

A handwritten signature in black ink, appearing to read 'H R Jones', with a stylized flourish at the end.

Howard R Jones

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