

15 December 2020

Mr Rob Stokes  
Minister for Planning Industry & Environment  
NSW Department of Planning,  
Industry & Environment

Dear Mr Stokes,

**Re: Exhibition – Review of the Illawarra Shoalhaven Regional Plan 2041**

We are writing in relation to NSW Government's five-yearly review of the Illawarra Shoalhaven Regional Plan, first released in 2015. The Department should be congratulated on the development of a comprehensive regional plan that guides planning and land use decisions over the next 20 years. The Regional Plan is strongly supportive of community vision in the Illawarra and Shoalhaven area and encourages opportunities for the growth of housing and jobs.

As a significant landowner and developer throughout the Illawarra Region for many years, we are writing to offer our support in assisting Government in achieving the Regional Plan's priorities via the following objectives:

- Objective 12 – build resilient places and communities;
- Objective 18 – provide housing supply in the right locations;
- Objective 19 – deliver housing that is more diverse and affordable; and
- Objective 20 – establish a shared vision for the future of Bombo Quarry lands.

For many years now we have been involved with the delivery of housing within the Kiama LGA and continue to work with Council's in realizing opportunities to develop land, either owned privately or through land identified by Council's for infill development.

In response to Kiama Council's draft Local Strategic Planning Statement released in April 2020, we encouraged Council to update the Kiama Urban Development Strategy 2011 and the maps associated with that study to identify areas for future greenfield development. Specifically, we suggested that the land at 177 Long Brush Road Jerrara (Lot 201 DP 1148007) and 199 Long Brush Rd Jerrara (Lot 1 DP 61118) be considered as land appropriate for inclusion in the mapped lands on which Planning Proposals for Greenfield Housing will be considered.



**Figure 1 Local Context of the Subject Site at 177 & 199 Long Brush Road Jerrara**

The site is well located in proximity to the town as illustrated in Figure 1. The site is also well located in proximity to the Bacsaddle Pty Ltd lands as illustrated in Figure 2 that were the subject of a recent Planning

Proposal for residential land which was refused Gateway. The reasons for that decision included:

*“The Illawarra/Shoalhaven Regional Plan includes an action for the Department to collaborate with Council to review housing opportunities to respond to changing housing needs. The Panel was advised this will be progressed in the context of preparation of a local strategic planning statement... The Panel recommends that the process of the Local Strategic Planning Statement will inform a position on the appropriate population density and boundaries of the Kiama urban area as well as the future of agriculture and secondary industries (Rezoning Review Record Of Decision Southern Regional Planning Panel 18 June 2019).*



**Figure 2 the Subject Site at 177 and 199 Long Brush Road Jerrara and adjacent Blacksaddle Pty Ltd holding**

We note that there is no evidence in the publicly exhibited LSPS documentation that this collaboration with the Department of Planning industry and Environment (DPIE) to examine new housing opportunities and respond to Kiama's changing needs has occurred.

The LSPS's *Planning Priority 1 – Housing and Land Supply* identifies that 2019 population projections indicate that the population of Kiama is estimated to increase by 4,000 people between 2016 and 2041, from 22,100 to 26,100, with a further increase to 27,100 by 2036 (representing an additional 1,000 people). This represents a total of 5000 additional people living in the LGA by 2036.

This need for additional housing will also be driven by demographic change. The LSPS identifies that the population is ageing, but also that the number of families without children within the LGA will increase as a proportion of total population to almost 50% by 2041. These demographic changes will drive demand for greater housing diversity. The LSPS identified that:

*“over the previous 10 years, only 42% of new dwellings were located in greenfield areas, highlighting the importance of infill redevelopment to the Kiama housing market. Over the same 10 years, 65% of new dwellings were detached housing compared to 35% being multi-unit housing. In considering the historic mix of housing supply along with the projections for future family types, planning for a balanced mix of housing types would seem to be reasonable. This would equate to 1,425 greenfield dwellings and the same number of housing provided through redevelopment of existing residential areas.”*

We support the LSPS vision that seeks to accommodate both additional housing demand and greater diversity of housing types in greenfield and infill areas. However, we consider that the locations and extent of greenfield housing that make up this mix require review and revision. This is because planning for older people and families without children may unnecessarily constrains the future economic and social sustainability of Kiama.

Council needs to encourage young people and young families to stay in the region or relocate. Affordable new housing is key to this as demonstrated by the growth in adjacent LGAs.

The draft LSPS adopted and relied upon the Kiama Urban Strategy which is now almost ten years old and no longer a relevant strategic planning consideration. It does not take into account projected population trends and changing demographics, housing demand and affordability issues inherent within the local and regional housing markets. Nor does it consider the more recent endowments of the LGA such as the pilot of the NBN which provides work from home opportunities which should be leveraged in any post COVID19 recovery.

The Kiama Urban Strategy no longer meets the LGA's strategic needs because it relies on limited land options for future greenfield housing development. This includes a development pipeline comprising of land that has been zoned residential but has remained undeveloped for a considerable time (pre 2011). This demonstrates that these lands may be uneconomic and not be suitable for urban development further reducing supply and inflating local prices.

The LSPS identified that the Kiama urban area will be required to provide up to 50% of new supply through infill development. This will further constrain supply of affordable housing, as it relies on undemonstrated development opportunities within the existing urban area and future rezoning of land for increased density within an unknown timeframe. In addition, as the dominant housing type in the market is detached housing, there will be increasingly few opportunities to provide these through infill development.

As identified in the 5 - yearly review of the Illawarra Shoalhaven Regional Plan 2041, we submit that the lack of industrial land supply in the LGA is best addressed through conversion of land at Bombo Quarry, in tandem with alternative opportunities for greenfield residential development provided in west Kiama. There has been a lag in NSW Government bringing forward the required urban planning studies and industry consultation in order to realise this opportunity what will offer a significant step in the right direction in achieving the objective as identified in the Illawarra Shoalhaven Regional Plan.

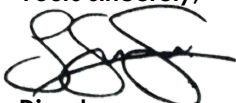
All the factors outlined above have the effect of reducing housing supply and increasing prices to exclude young people and families from the opportunities provided to residents of Kiama. The high quality NBN and associated opportunities to work from home that Kiama's existing residents benefit from would be better shared with younger members of the demographic who are better placed to ensure the long term future economic and social prosperity of the LGA.

Consequently, we request that collaboration with both DPIE and landowners occur in the form of a review and update of the Kiama Urban Strategy. We further request that the land at 177 and 199 Long Brush Road Jerrara be considered for future greenfield residential land development and that with the Departments support, Kiama Council is encouraged to consult with and collaborate with us and other landowners as an inherent part of that collaborative review.

Opportunities for more greenfield housing would help to address and meet the objectives as identified in the Illawarra Shoalhaven Regional Plan.

We look forward to the Department's positive response to the matters proposed above and can be contacted on the details provided below to discuss a way forward for the collaborative review of the Kiama Urban Strategy and the consideration of lands at 177 and 199 long Brush Road Jerrara for future greenfield development.

**Yours sincerely,**



**Director  
Ocean Farm Pty Ltd**

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