SUBMISSION BY

Planning Institute Australia (NSW Division)
Level 5
579 Harris Street
Ultimo NSW 2007
T: (02) 9280 2121
F: (02) 9281 0648

PURPOSE

This submission is made by the Planning Institute of Australia [PIA] NSW Division to the Department of Planning in relation to the Draft Illawarra Regional Strategy 2006-2031

The submission has been prepared by Illawarra / South Coast Branch of the NSW Division of the Planning Institute and edited by the Division’s Executive Officer

At the time of this submission the office bearers of the NSW Division are Anthony Newland [President] Greg Woodhams and Julie Bindon [Vice President’s], Tony McNamara [Treasurer] and Monique Roser [Immediate Past President].

INFORMATION

Who is making the submission?

The Planning Institute of Australia [PIA] is a voluntary subscription based member organization with 4500 members.

The New South Wales Division of PIA has 1400 members.

The Planning Institute is the peak body representing professions involved in planning Australian cities, towns and regions.
INTRODUCTION

The PIA is pleased to provide comment in relation to the Draft Illawarra Regional Strategy, and supports the directions and initiatives introduced by the NSW Department of Planning. The recognition by the Minister for Planning, the Honorable Frank Sartor, of the greater role of the regions in the economic, environmental and cultural leadership of the State of NSW and the need for sound strategic planning to guide the region so that it can reach it's potential is also welcomed.

The submission addresses the matters raised on a chapter by chapter basis but also highlights the overall critical and significant issues.

Support

The Planning Institute of Australia supports the Draft Illawarra Regional Strategy in the following areas:

- The development of a Regional Strategy for the Illawarra to guide future development.
- The use of this Strategy as a basis for future statutory planning documents.
- The intent to encourage greater employment and concentrate the Illawarra into a more self sustaining region rather than a dormitory suburb of Sydney.

Issues for Greater Consideration:

PIA considers that there are areas which require further information and commitment from Government to ensure that the desired outcomes are meet. These are:

- The need for the strategy to be developed into a more robust document to guide the vision
- Maintained support by the Government for decentralization and the development of the Illawarra as a more autonomous region
- Support for the themes from the public consultation process including:
  - More local jobs
  - Implementation of programs to reduce and prevent crime
  - More community facilities particularly in North Wollongong
  - Planning for population growth with well serviced employment and residential areas.
  - Promotion of healthy living particularly related to mental health.
  - Better transport to parts of Sydney other than the CBD
  - Developing a broader economic base and improving skills in the region
  - Increased use of rail for freight.

The Institute also considers that commenting on the Strategy would be assisted by the public availability of the background documents.
EXECUTIVE SUMMARY

The Institute strongly supports the preparation of Regional Strategies to assist in the growth and prosperity of the region. We have continuously said that this is a better approach than the previous Regional Plans, which tended to take a more legalistic and dogmatic attitude towards directing local planning.

We also support with the general thrust of the Draft Illawarra Regional Strategy and its vision for the future of a “prosperous, diverse and sustainable future for the Illawarra”. However we have several suggestions that should be incorporated in the final document to ensure that it delivers real planning outcomes for the region. These include:

1. More comprehensive and objective assessment of the needs of the region, both now and in the future. This needs to be based on the background studies on which the Strategy was based and these need to be summarised in the text and properly referenced).

2. A clearer unequivocal and unambiguous direction for the region that is clearly spelled out in the document and understood in the text and the maps which support the Strategy.

3. A clearer demonstration of the “Whole of Government” approach to regional planning across all agencies (including health, emergency, education, and utilities).

4. More deliberate consultation with key stakeholders (local Councils, PIA, PCA, UDIA) on the preliminary Draft Strategy. We would suggest that a further draft document be prepared and circulated to these organisations before formal adoption.

5. More forward-looking population and dwelling forecasts, which take into account current and Metropolitan Strategy growth rates and include contingencies such as continued migration to Sydney and spill over effects for the Illawarra.

6. More contextual analysis which consideration of the role of the region in terms of the State Plan, State Infrastructure Strategy and Metropolitan Strategy.

7. Key infrastructure needs of the region necessary to meet the projected population targets (again, including health, emergency, education, and utilities) he and funds committed to their implementation.

The Institute remains concerned that the Department continues with the use of a “template” for its regional strategies. We believe that this “straight jackets” the final product as many of our comments on both the Lower Hunter and South Coast Strategies prevail with the current Illawarra document.
REGIONAL CONTEXT

There is little discussion in the opening sections (or the document itself) about the role of the Region within the State. The Institute made similar comments on the South Coast Strategy. For example, the basis for the planned population increase is not stated, but it is down to only a third the rate of that over the past 25 years. We would suggest that, given the constraints and sometimes counter-productive side-effects of the growth of Sydney, a more pro-active, planned policy towards decentralisation would be evident.

The NSW Government’s State Plan “A New Direction for NSW” provides clear plans, goals and benchmarks for NSW. In August 2006 the Illawarra community met representatives of Government and highlighted major issues to be addressed in the Plan for the Region. There needs to be a greater effort in the Strategy to draw on the themes of the Illawarra consultation, namely:

- **Unemployment** - need more local jobs, especially for young people, so they can stay in the region. Need to diversify employment opportunities.

- **Crime Prevention** - anti-social behaviour is major concern as there needs to be more discipline and improved respect for the police. Increase policing in the area.

- **Community Facilities & Services** - need more facilities north of Wollongong and improve information to the public (especially the elderly) regarding what community facilities and services are available.

- **Planning for Population Growth** - identifying new living and work areas as well as timing of infrastructure and services to meet population growth.

- **Mental health** - promote healthy living in the broadest sense not just in medical treatment. Provision of health services across the region.

The Illawarra consultation also indicated that the NSW could improve in the following areas:

- **Improved connections to parts of Sydney other than the City Centre** (eg - Western Sydney & Parramatta).

- **Increase freight on rail.**

- **Increase police powers and provide more support for their work particularly regarding anti-social behaviour.**

- **Broaden the economic base and address the skills shortage of the region.**

Each of these themes, need to be adequately addressed in the Strategy.

The Illawarra consultation also indicated that the most important priorities in the Draft Plan should be
• Jobs closer to home
• Reduce rates of crime, particularly violent crime
• More students completing Year 12 or equivalent across NSW
• Students exceeding key national benchmarks for attainment
• Environment for Living (all priorities within this theme)
• Electricity & water supply meet reliability performance standards
• Cleaner air that meets national air quality standards and progress towards greenhouse targets
• Improved natural environment that meets Natural Resource Commission targets for water, native vegetation, land and biodiversity
• Increase proportion of freight on rail
• Targets for housing and land supply achieved
• Growing skills base and business investment for regional areas
• Improving the design of the public domain

Again, each of these priorities needs to be adequately addressed in the Strategy.

We consider a significant deficit is that none of the background papers justifying much of the Strategy have been made public including:

• Land and Housing Supply Study (Macroplan)
• Metropolitan Development Programme Update (DoP)
• Headline Planning Issues (IRIS)
• Environmental and Sustainability review (DoP)
• Economic and demographic Profile (IRIS)
• Illawarra Industrial Lands Audit (SGS Economics and Planning)

We feel that these documents should be included within the exhibition material to the public.

Without these documents it is difficult to comment further, and it is possible that some of our queries have been covered but not explicitly stated. Nonetheless we make note of the following points.
CHAPTER 2 – REGIONAL CHALLENGES

The regional challenges of economic, population and housing, and economic are discussed below under the same headings in Sections 4 – 11.

CHAPTER 3 – A VISION FOR THE FUTURE

The statements about a prosperous, diverse and sustainable region are supported.

The aims of the Strategy are also supported but they lack detail to be effective and measurable. For instance, how are 30,000 jobs to be created?

Housing diversity, affordability and choice should be an aim of the strategy.

The statement that “all major development proposals will be required to fully or substantially contribute to additional regional infrastructure costs, with the contribution to be determined after taking account of the Regional Strategy and any associated infrastructure plan and equity considerations” lacks detail. Investors would find it difficult to get the clarity needed as to the make financial decisions having regard to the “Regional Strategy and any associated infrastructure plan and equity considerations”.

It should be said that there are many noble statements in the Draft Strategy and few planners would object to these. However, they lack the detail and clarity needed to make sound investment decisions and in the end will end up playing a back seat to real policy formulation in the region. The Strategy could end up being nothing more than a discussion paper, and we know that the State Government wishes to successfully implement the Strategy. Having said this, all the rhetorical statements in the Strategy should be rephrased in terms of the useful SMART acronym - specific, measurable, achievable, realistic and time-related.

THE DRAFT ILLAWARRA REGIONAL STRATEGY MAP

The statement that the Strategy is “represented on two maps, which identify the overall structure of the Region and the Significant biodiversity” requires clarification. It is unclear whether this map is to be taken literally or figuratively. Is what is “on or off the Strategy” intended limited to one single A3 map? Does the Strategy proper start at page 12 after the map?

The map would appear to be based on readily available GIS data sets (e.g. high conservation value vegetation appears to have been sourced from DEC) but it is produced at such an unknown yet very small scale (1:200,000 or smaller) that it is difficult to see detail at a local level. Paradoxically, some of the statements in the Strategy are specific in that unless sites are listed on the Strategy (again unsure what is referred to as the Strategy) then they will not be considered for certain development.
At least there should be several A3 maps which deal with different parts of the Illawarra. Perhaps these could be based on LGA’s or sub regions e.g. northern villages, heavy industry.

In terms of the map, there is no advice as to how things get onto the strategy and are taken off it. Does being “on the strategy” mean that there is a small note on the map of the project, for example is the important Headlands Hotel site, Jamberoo Recreation Park, Sea Cliff Bridge and Tullimbar Village on the Strategy? There is no specific mention of coal resources on the map - Dendrobium Mine, Elouera (Wongawilli) Mine, Avondale and South Bulli are not depicted on the Map. There is no obvious delineation of coal resources.

These are all major projects and arguably of regional importance. Is there nothing in Kiama on the Strategy?

Are agricultural areas recognised as an employer or more for their cultural significance?

The town symbol is confused with the railway symbol.

Is waste disposal a matter of regional significance?

Many of the Appendix 2 projects are not listed on the Map.

Areas on the MDP (i.e. West Dapto 1 – 5, Calderwood 6, Albion Park West 7 and 8 and Dunmore 11b) are not been included on the Strategy map and should be. A suggested map is included.

We believe that some of these matters can be addressed with greater mapping detail, however the Strategy should clearly state which sites are included, or provide a clear statement of flexibility for future matters, linked to SMART performance objectives.
CHAPTER 4 - ECONOMIC DEVELOPMENT AND EMPLOYMENT GROWTH

Background

The economic challenges are supported but again read more like a discussion paper than a Strategy. These could be rephrased as clear actions budgets, timeframes, levels of accountability, and key performance indicators.

The aims of the Strategy are also supported but they lack detail to be effective and measurable. For instance, how are 30,000 jobs to be created?

Housing diversity, affordability and choice should be an aim of the strategy.

The strategy should document in more detail the existing pressures on industry. Manufacturing is likely to reduce its importance in the region and the impact of this restructure needs to be addressed in an overall context. How is the workplace to reposition itself, what about retraining? These priorities need alignment with the skill sets of UoW and TAFE graduates.

Is there any infrastructure commitment to the manufacturing processes in the region?

The percentage of commuters may be understated. The West Dapto Economic and Employment Study (SGS Economics, 2005) reports that the local government areas of Wollongong, Shellharbour and Kiama provide 68.2%, 36.7% and 29.4% respectively of jobs within their boundaries. As a whole the region provides 57.3% which means that 43,940 residents are travelling outside the sub-region to access job opportunities. This has economic, social, and environmental implications as previously discussed.

We would question the surplus of vacant employment land in Wollongong LGA. For instance there is about 265ha of vacant industrial land at Kembla Grange, but about 70% of this is affected by physical land constraints such as flooding, riparian, contamination and heritage. Moreover, land ownership presents a further constraint with vast tracts of land around steelworks and port and their intentions to development are unknown at this stage (SGS Economics, 2005). The SGS Economics work on which much of this analysis is based is still not publicly available.

The employment lands guidelines will be an important part of the Strategy as they will specify appropriate development controls for different activities as well as establish an employment lands monitoring program. It would have been preferable to have such guidelines in the current Draft Strategy and available for comment.

The Strategy is overly focussed on manufacturing. There should be an equal discussion on other industries such as tourism, education, human services, hospitality and farming. The strategy makes only makes minor mention of the Shellharbour Marina. This will be the largest marina in NSW, the only modern marina facility between Sydney and Batemans Bay and the largest man made tourism infrastructure project in the Illawarra. The project is a significant generator of employment for the region and was previously
scheduled by the State Government (Premier Carr) as a significant employment generator post the 2000 Olympics.

The Strategy does not provide any incentives to develop land that is already zoned for employment purposes. Existing employment land is vacant because infrastructure is not available or the economic viability of relocating to the Illawarra is not attractive. Current policies by Wollongong Council and the Department of Planning in raising levies are unlikely to assist in attracting employment to the Illawarra.

**Outcomes**

Employment capacity opportunities have been identified…and will be further developed through Employment Lands Guidelines. This is an important part of the Strategy and should be included for public comment.

The statement that “the economic value of natural and cultural resources and environments in the Illawarra will be recognised as employment generators due to their importance to tourism and primary industries, including agriculture, fishing and extractive industry” may need some explanation. Again, it would be helpful if there were some numbers about the contribution of natural and cultural resources to local economies and as employers.
CHAPTER 5 - REGIONAL TRANSPORT

The Illawarra / Sydney transport corridor is the busiest in Australia. The IRS gives insufficient emphasis to promoting further investigation into improving the rail corridor between Wollongong and Sydney to complement the road network.

PIA support the upgrade of Mount Ousley and the investigation of alternatives to Macquarie Pass (Caloola Pass).

CHAPTER 6 - HOUSING AND SETTLEMENT

The draft Strategy appears to be based on conservative estimate of population growth. It notes that the Illawarra is experiencing “moderate growth”, but growth projections are less than historical statistics.

It assumes very modest population growth rates of 0.68% per annum with occupancy rates at 2.3 per dwelling. The growth rates are 25% less than the current growth rate of 0.85% and compare with the Metropolitan Strategy predicted population growth rates of 1% per annum with occupancy rates at 2.3 to 2.5 per dwelling. It is appropriate to highlight that recently released Draft Strategies contain different growth forecasts.

- The Draft Illawarra Regional Strategy states that the Illawarra Region's population will grow by 47,600 over the next 25 years with a demand for 38,000 new dwellings overall or 1520 per annum.
- By way of contrast, the Draft Wollongong City Centre Strategy states that Wollongong LGA population growth will be 52,000 over the next 25 years with a dwelling demand of 32,400.
- The Wollongong City Council Housing Strategy forecasts growth in its LGA of 42,700 over the next 25 years.

The Strategy appears to be based on a 25 year forecast but then jumps to 30 to 40 yr forecasts. (page 1, 3 vs 11). This is further complicated by the West Dapto proposal which is based on a projection of 30 to 40 years.

These projections indicate that there will be negative population growth for Shellharbour and Kiama combined of 4,400 (Wollongong LGA 52,000: Region 47,600) or growth of only 4,900 (Wollongong LGA 42,700: Region 47,600). The latter figure provides growth of only 200 people or 0.2% per annum.

The Draft Strategy identifies current capacity for housing in the Region as follows:

- Current new release areas - 6550 dwellings
- West Dapto -19,350 dwellings over a 30 to 40 year period.
- Infill on vacant land – 4,900 dwellings.
- Redevelopment – 11,200 dwellings (possible shortfall of 4,500).
Calderwood - 8,000 dwellings in the event that “…demand for additional housing supply arises because of growth beyond the projections of this strategy…”

No other Greenfield supply source has been nominated to meet housing supply in Shellharbour or Kiama.

The Strategy suggests a shift from current Greenfield/medium density ratio of 90/10 to 50/50. This is supportable but a transition period will be required while the economic and labour factors adjust. This means Greenfield delivery will need to be greater weighted early in the IRS forecasting period, and reinforces comments from the industry that Greenfield land needs to be released on multiple fronts in the Wollongong and Shellharbour LGA.

The remaining lands on the MDP including West Dapto, Calderwood, Shellharbour fringe lands and disused escarpment mine sites to be included on the Strategy subject to meeting the sustainability criteria of Appendix 1.

The Strategy is inconsistent in the assumptions for provision of detached (greenfield) lots. Pages 1,3 and 20 suggest that West Dapto will provide 19,350 lots in the 25 year planning period. But pages 11 & 21 states West Dapto will provide “approximately 19,000 new dwellings over the next 30 to 40 years”. This latter projection is consistent with the draft West Dapto planning studies and equates to a projection of between 11,875 and 15,800 lots over the 25 year planning period if lot production were to start today, and between 9,500 and 12,670 lots over the 25 year planning period if lot production starts in 5 years time. Under these scenarios the supply will not meet demand, even for the modest population growth projections adopted by DoP.

The table on page 20 indicates that 19,350 lots will be delivered in West Dapto over the 25 year planning period. If this were to be delivered (keeping in mind the anomalies identified above) this would require a production rate of 774 lots per year for every year of the 25 year timeframe. Evidence before the Institute suggests that about 800 lots per annum (15 lots per week) cannot be achieved from a single development front. The administration, construction and sales of 15 lots per week cannot be sustained in the Illawarra market.

Paradoxically, the Draft Strategy acknowledges that “housing stress is a continuing problem in the Region and has now reached a point where many local residents are being excluded from participating in the housing market, especially in Kiama”. This evidence of undersupply has not been addressed in the population projections. Illawarra needs a greater reservoir of Greenfield sites to meet demand if affordability, economic growth and employment are to be maintained.

The Strategy states that “the focus for Shellharbour will shift towards urban renewal opportunities” (page 10), but there is neither justification for such renewal nor how such renewal will be encouraged.
Illawarra Metropolitan Development Programme

The comment that “an additional major new release area needs to be brought online within the next two to three years to avoid a regional housing shortage, particularly for detached housing” echoes for the planning for West Dapto. This land release faces significant constraints such as flood-free access, no single large developer, fragmented ownership, small lot sizes and excessive up-front costs for infrastructure.

The pent up demand for Greenfield land lends further support to the fact that multiple fronts (as has traditionally occurred in the Illawarra) should be encouraged for the West Dapto & Calderwood release areas.

DoP's proposal to release Calderwood if growth exceeds predictions is qualitative. It will be a self-fulfilling prophesy if insufficient land is released to satisfy growth. Development of Calderwood is at the subjective decision of government rather than the economic realities of market forces.

It is potentially poor strategic planning to exclude a release area that will be called upon if an assumed growth scenario is exceeded. Rather the Calderwood area should be included in the Strategy as a future urban release area subject to the same masterplanning and approval processes as other sites.

The Strategy should be amended to remove inconsistencies in population and housing projections within the document. Prepare a sensitivity analysis on the full range of potential population projects and allow serviceable land such as Calderwood, Shellharbour fringe lands and disused escarpment mine sites to be released to meet market demand.

Urban design and affordability

The Strategy does not expand on the need for good urban design. Critical will be the layout of the street and block patterns relative to the topography and sight lines. A clear and legible hierarchy of streets can assist in creating walkable neighborhoods and a sense of place. Regeneration in existing precincts should use design based planning to ensure appropriate building forms and typologies relative to street blocks and subdivision patterns.

Affordable housing is an issue of enormous importance. It is essentially a State Government responsibility, using fiscal rather than development control measures, yet the strategy has little to say on how it is to be tackled. What is said is that “local plans will consider appropriate affordable housing strategies tailored to local opportunities”. The Institute supports the pursuit of affordable housing, but believes that the responsibility is with state government requires more than local policies and planning.

The NSW government is seeking ever-higher contributions and infrastructure provision from developers. The NSW State Infrastructure Strategy seeks to “encourage private sector investment in new (electricity) generation” (page 5). The omission of significant
infrastructure in the draft Strategy leaves it to homeowners to wear the burden of higher contributions.

This is creating intergenerational inequity by requiring that new homeowners pay a greater proportion of new infrastructure (which must be built to a greater standard than ever before) and then continue to pay rates and taxes for the use of such infrastructure.

High developer charges artificially distorts the housing market between new greenfield and older suburbs. High charges can only serve to reduce housing affordability in the Illawarra.

**Outcomes**

The need to concentrate most new development within or adjacent to existing settlements makes sense, although some threshold analyses would provide better justification and might accelerate development in some settlements at the expense of others.
CHAPTER 7 - NATURAL ENVIRONMENT

Background
The Strategy states that the “West Dapto Urban Release area contains one of the most significant east-west regional biodiversity corridors”. There is no further explanation of the corridor or its environmental, social or economic impact. We would question the science behind the corridor and the mapping used to delineate its spatial extent. In reality, the corridor doesn’t lead anywhere and ends abruptly at the Lake foreshore. Almost all the land is privately owned, held in small fragmented ownerships, cleared and currently zoned for purposes other than conservation. Rural landholders have continuously stated their opposition to the Yallah – Calderwood Corridor and will no forego their livelihood and legal right to farm by converting their productive land into some form of habitat.

The statement that “the natural environment in the south of the Region in Kiama and parts of Shellharbour supports agricultural industries” needs some justification. Shellharbour Council reports that the rural industries in its City contribute very little to overall GDP. In 1993 – 1994 such industries were valued at $5.5M and almost 80% of this production was due to dairying. Deregulation of the industry has meant further declines in this industry. The Agricultural Diversification Study (June 2003) confirmed these trends in that escalating land values and falling milk prices are acting as a deterrent to new entrants, to succession in the family farm and to amalgamation of existing dairy property. That Study found that it is unlikely that the dairy industry will expand overall in the region in the near future but will instead most likely decline somewhat further but not dramatically during the next decade. We would expect similar conditions in Kiama to prevail.

The statement that “The planning of the West Dapto new release area provides a particular opportunity to enhance the protection of the best remaining vegetation corridor between the escarpment and the coastal plain between Marshall Mount and Yallah” may need some explanation. Land comprising the Yallah Calderwood Corridor is privately owed and generally separated from the West Dapto urban release area. As noted above, almost all the land in the “corridor” is privately owned and held in small fragmented ownerships.

The Strategy notes that only 7% of the Region is conserved in National Parks and Reserves. In fact very little of the Escarpment is actually held in public ownership and is therefore inaccessible. Moreover, whilst a further 33% is managed as part of the Sydney Water Supply Special Catchment Area, this area is also not accessible. The same could be said of the cultural landscapes in Kiama. Whilst they are nice to look at, they are generally off limits to the public. The Strategy needs to embody key initiatives to develop recreation and tourist opportunities of the natural environment.

Vegetation on the foothills and coastal plain of the Illawarra is more dispersed and vulnerable and is not as well represented in reserves as escarpment and plateau woodlands. This is true but calls into question the apparent strong support for existing rural enterprises which are a key threatening process for endangered ecology.
Development of degraded land has potential to provide environmental benefits. The IRS should emphasise the potential benefits of urban development funding rehabilitation works on disused quarries and mine sites (eg Excelsior, Bulli Brickworks, South Bulli Mine, Avon mine etc).

Map 2 (page 24) relating to biodiversity summarises many of the environmental issues facing the region. The map shows that all land that is not current urban footprint is ocean, national park, state forest, natural resource area or significant native vegetation. The balance is urban footprint. PIA would request that environmental attributes be balanced with the social and economic outcomes that make the Illawarra a desirable place to visit and live.

Outcomes

“The environmental condition of Lake Illawarra will be improved or maintained through the incorporation of a high standard of water cycle management in the development of West Dapto and redevelopment of existing urban areas”. For this to happen, West Dapto needs be developed along WSUD lines, involving site-specific dual water systems, grey-water recycling, BASIX compliance, extensive creek rehabilitation, and ownership of non-urban land. DoP and Council need to commit to these outcomes and hold West Dapto up as an example urban release area.
CHAPTER 8 - NATURAL HAZARDS

Background
The Strategy notes that Council’s in the region are at varying stages in their floodplain management planning. Some have committed to a strategy of preparing and implementing Floodplain Risk Management Plans throughout their local government area, others have Plans which are underway or completed. The Strategy says that Councils with limited information of the flood hazard areas that are subject to new development will need to consider strategies to advance floodplain risk management plans for rezonings and new development.

The Institute would call for a more reasoned and consistent approach to Flood Plain Management Planning across the region.

The Institute has concerns with the basic assumption that all new development will exacerbate the risk of flooding to occupants of land, and risk of damage to buildings. And conversely, the existing occupants are not under any significant risk. In practice however, we all live with risk daily. We drive our cars to work, we jump out of planes – we live in known fault lines that suffer frequent earthquakes. Whether the risk is tolerable needs to be assessed.

We note with interest the likes of Shoalhaven and Camden Councils, who have created DCPs based on flood hazard – a position advocated in the NSW Governments Floodplain Development Manual. Such DCPs recognise that whilst flood hazard (and risk) is real and needs appropriate consideration, many ‘high hazard’ sites are developable, especially when other factors such as the social and economic benefits of floodplain development are consider – an approach also advocated by the Floodplain Development Manual.

Councils who develop DCPs inconsistent with the NSW Governments approach and other true risk based assessments need to revise their strategies. The consequence of such action is the sterilisation of the floodplain will continue to be a frequent occurrence and the many benefits appropriate development will bring will be lost.

Constraints such as flooding, bushfire and landslip are significant issues that must be considered in any masterplanning exercise.

Outcomes
More detail is needed to validate the statement that “the Regional Strategy prevents future urban development from being located in areas at high risk from natural hazards”.

Actions
The statement that “Until Flood Risk Management Plans are made by councils and Coastal Zone Management Plans by the Minister for Natural Resources, councils cannot zone land or approve new development in potential hazard areas in isolation, unless assessed within a risk assessment framework adopted by the council”. Is this supposed to accord with the section 117(2) Direction relating to flood risk? This statement may need further clarification. Taken literally, it would stop all development in areas affected by hazard.
CHAPTER 9 - WATER, ENERGY AND WASTE

The Strategy “incorporates the specific regional infrastructure requirements identified in the State Infrastructure Strategy”. However beyond the list at Appendix 2, there is no obvious link with the SIS. Many of the projects listed in Appendix 2 have already been completed. There is little analysis about future needs of the region and when and how these are to be provided. Conversely the inside cover states that “infrastructure planning will take into account the broad planning framework…” There needs to be a greater emphasis on identifying the future characteristics of the region and the infrastructure and services necessary for support. This needs to be in great enough detail as to be costed, implemented in order to give certainty to investors.

The provision of infrastructure is absolutely fundamental to any planning proposal. The Institute has suggested that specific costed and scheduled proposals, such as have been prepared for the South East Queensland Regional Plan would be welcome. Failing that it would be worthwhile to see some element of regional infrastructure such as priorities for roads, housing, hospitals, higher education, ports, energy and communications. Where these to be paid for by developers (and costs passed on to the homeowner), the principles underpinning contributions should be clarified.
CHAPTER 10 - RURAL LANDSCAPE AND RURAL COMMUNITIES

Background

The Draft Strategy seeks to protect agricultural land for future enterprises by preventing further fragmentation of land through continuation of the 40 ha minimum lot size. Strict adherence to the 40ha policy seems contrary to a best practice performance-based approach. A prescriptive enforcement of the 40ha policy does nothing more than to document what the policy was intended to stop – the subdivision of land into small non-viable parcels - this time into 40ha parcels.

The existing landholdings have already been fragmented through past subdivision patterns that have been actively supported by Council. It appears that the policy has been used as the norm when it was intended as in interim measure to protect prime agricultural land. In fact one of the objectives of the 40ha policy was to prevent on the fringe of urban areas the premature subdivision of land into small lots to prevent the proper layout of expanding urban areas.

The Strategy seems uncertain regarding the acceptability of future rural residential development. In the first paragraph of column two (page 32) the Strategy states that a strong demand for rural residential development exists and unless strategically located, this development is undesirable. However, the overall outcome of the Strategy is “no new residential or rural residential zones”. The need for a settlement strategy or agreed structure plan to consider rural residential development seems to be an overly complex approach that is unlikely to proceed given the requirements now on local council’s to deliver principal LEPs and consolidated DCPs for their local areas.

The new Standard Instrument provides the opportunity to consider rural residential development in proposed standard zone. Under a Council’s principal LEP a range of standard zones can be applied that permit rural residential development. In fact all standard LEP template zones that would generally apply in rural areas permit dwelling houses which are compulsory clauses.

Any decisions regarding rural residential development need to be made by Councils in preparing their principal LEPs. Councils will also need to provide minimum lot sizes for specific zones and areas as a map within the principal LEP. Specifying a minimum lot size in existing areas surrounding rural towns and villages will be difficult given the fragmented patterns of subdivision. Specifying a 40ha minimum lot size over these fragmented areas will not achieve anything more than the status quo of stagnating rural land and stagnating rural towns and villages.

The Strategy should provide assistance to Council’s attempting to find a workable mix of land use zones that achieve real progress on agricultural development and sustainable growth in support of rural villages and towns.

Outcomes

The strong reluctance to entertain rural lifestyle or residential uses is perhaps needs to be considered from a forward looking approach. Both land use options present opportunities
for environmentally sensitive development that will free up much needed capital that can be diverted into areas of rehabilitation, weed eradication, development of catchment-wide treatment points. These lands can be ecologically sustainable, can fix up the current environmental problems and can improve the current socio-demographic mix of the region (i.e. more high income earners).

The future role of agriculture and the sustainable development of rural towns and villages need greater attention in the Strategy. The positive role of development surrounding existing towns and villages is largely overlooked. The Strategy defers to the current status quo of stagnating rural land and agricultural development and also stagnating rural towns and villages increasingly dependent on weekend tourist trade hit hard by rising fuel costs. A further round of strategies or structure planning will further entrench this status quo if actions cannot be delivered under preparation of Council Principal LEPS.

The Draft Strategy needs to provide guidance and actions for agricultural development and how in areas adjoining existing rural towns and villages limited development can be achieved which assists agricultural enterprise. The proposal for Lot 1 DP 931474 Minnamurra Lane, Jamberoo is a useful case study that demonstrates how limited development in areas adjoining a rural village can achieve desirable outcomes for agriculture, the village and the environment.

Significant work by Government at the local and state level together with industry lead reviews has been completed in the state of play for agriculture in the Illawarra, most notable being the recent Agricultural Diversification Study for the Region (June 2003). From this available background data sufficient impetus exists to warrant a greater degree of attention in the Strategy.
CHAPTER 12 - IMPLEMENTATION

The “final Strategy will represent an agreed NSW Government Position”. However it unclear what level the support has from other Agencies and Stakeholders. There is no obvious support to the document from any agency and local Council’s themselves have expressed frustration as to not being consulted on the preliminary draft of the document.

The statement that “the Illawarra Regional Strategy will be implemented primarily through LEPs, DCPs, the State Infrastructure Strategy and funds collected as developer contributions” requires clarification. Experience shows that Strategy Documents have a life of their own and can be used to legitimise the needs of government on a needs basis.

What happens to the IREP No.1 and No.2 are they repealed by the Strategy or by the Comprehensive LEPs of each Council. If the latter, then they will still prevail over any inconsistencies with the Strategy.

The statement that “funds collected from contributions from major developments will be used for regional infrastructure (consistent with the State Infrastructure Strategy) and approved biodiversity outcomes” gives no certainty to developers that the money will be spent on specific projects and in a meaningful timeframe.

As the Institute wrote on the South Coast Strategy “Implementation is to be primarily through local councils and state infrastructure provision. As noted, the plan ought to be much more specific about infrastructure provision proposals or there is no real strategy. It also would be helpful if the processes by which local plans are assessed for compliance with the Strategy were to be spelled out, and, specifically, the mechanisms for conflict resolution”.

CHAPTER 13 – MONITORING AND REVIEW

The regular review of both the Illawarra Strategy and Council’s Comprehensive LEPs is supported. Specific timeframes and commitments need to be made. Appropriate resources need to be made available to ensure these commitments are met.

APPENDIX 1

The sustainability criteria are taken from the Metropolitan Strategy with one additional insert being the “Illawarra Regional Strategy”. This creates an awkward circular argument that any proposal which, by definition is contrary to an adopted Regional Strategy, must be assessed against the terms of the Strategy itself. The Appendix should also apply to non urban projects.

As per comments on the South Coast Strategy, “the Institute is concerned by the two appendices which have been included. We suggest that the strategic components of the sustainability criteria ought to be included in the Regional Strategy proper and the remaining elements are standard planning practice”.

APPENDIX 2

The Strategy includes a list of previously-announced NSW state government infrastructure projects. Other than this Appendix, there is no obvious link with the State Infrastructure Strategy. This point is reinforced in the NSW State Infrastructure Strategy that states “Many of the projects in this strategy have been planned or announced previously – the new direction is about delivering, and most importantly funding our plans”.

There is little analysis about future needs of the region and when and how these are to be provided. Conversely the inside cover states that “infrastructure planning will take into account the broad planning framework…” There needs to be a greater emphasis on identifying the desired future character of the region in both the rural and the urban areas. The infrastructure and services necessary to support these outcomes can then be determined. This needs to be in great enough detail as to be costed, implemented in order to give certainty to investors.

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