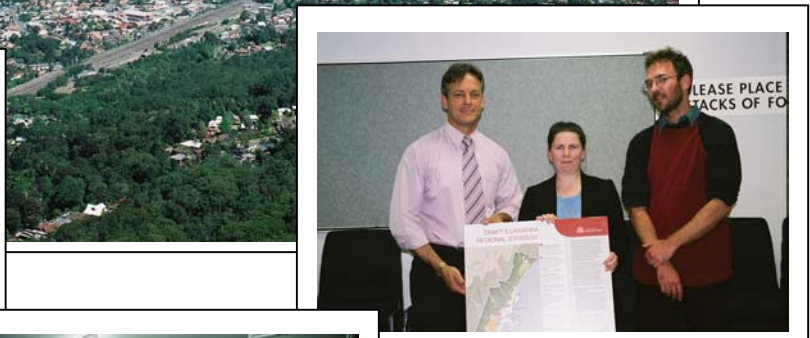
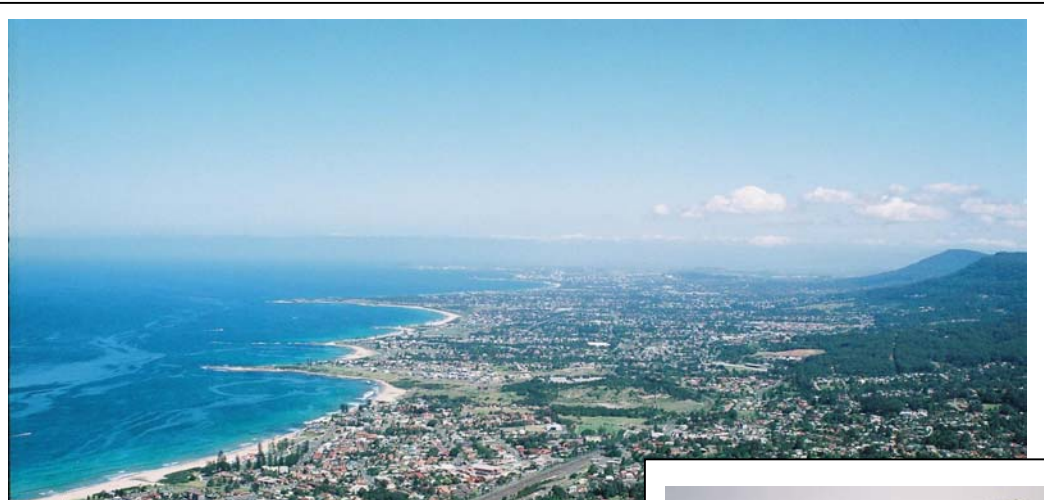


**Department of Planning**  
**Draft Illawarra Regional Strategy**



**DRAFT Submission by**

**Sonya McKay,**

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Please note that the author does not work in a legal professional capacity.

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## Forward

### Chance to be Visionary: 'No Economy without Environment'

It is too late for many areas in the Illawarra regarding what could have lent itself to improved planning. This strategy, however, provides a chance for the government to be visionary, in the face of necessary hard decisions. This is predominantly due to our biggest ecological and economic threat – 'global warming'. We need to strategise now in order for our children to have ecological and economic options during their life. This means the protection first and foremost of the ecological biodiversity in the area, a push for renewable clean energy, recycling in some degree, the promotion of high tech clean green employment and skills, the capture and maintenance of rural agricultural land wherever it is found, and a genuine public participation community discussion as to the amount of residential development the Illawarra can handle.

Instead of the strategy appearing to centre on non-sustainable growth it should focus on sustainable living and long term ecological and economic prosperity. The economy should not rely on the suggestion of long term prosperity through the false economies of building development and the exploitation and destruction of the environment, particularly regarding finite land and resources. We need to nurture the environment particularly in this time of continued drought. The region will need to become one of the agricultural and tourist greenbelts, to the level it can, for New South Wales at the expense of residential development.

Any suggestion of the need for negotiation between competing interest regarding development and possible loss of biodiversity is no longer working on a zero baseline. The Illawarra therefore, needs to protect what proportion of biodiversity still remains.

Although this submission does not determine it is the solution it at least points out concerns that should be addressed within what appears to be a Masterplan document (draft Illawarra Regional Strategy) brought before the community to comment on.

It is hoped that prior to finalising a decision on the document that the Minister travels to the Illawarra and discusses the strategy and submissions received, at the very least, with the community groups in the Illawarra including the Coalition of Groups, ICEC. I formally invite the Minister to meet with the Groups.

Sonya Mckay

## BACKGROUND

The draft Illawarra Regional Strategy will apply to Wollongong, Shellharbour and Kiama local government areas. It has been stated in the strategy that there are a number of other strategies occurring for high growth areas.

According to the Strategy:

‘The primary purpose of the Regional Strategy is to ensure that adequate land is available and appropriately located to sustainably accommodate the projected housing and employment needs of the Region’s population over the next 25 years.’

The strategy is also said to set out a range of actions to protect the regions most ‘magnificent natural features’. These are said to be the Illawarra escarpment, Lake Illawarra, and the Minnamurra Estuary.

### Legal and Policy

Although the strategy has not been outlined as a statutory document it will more than likely form the basis of Wollongong, Shellharbour and Kiama councils local environmental plans and therefore zonings, and ultimate council planning. Shellharbour City Council, in their business paper relating to their draft Illawarra Regional Strategy submission to the department of planning, have essentially conceded that such influence would be due to a Ministerial direction to do so under s.117 of the *Environmental Planning and Assessment Act*.

### THE STRATEGY

The strategy states that more than 280,000 people live in the Illawarra. It plans for a 47 600 population increase over the next 25 years, with 30 000 new jobs and an indication of the need for 38 000 new dwellings. It is proposed that this will occur through a mix of 50% detached housing and 50% medium/high density housing. West Dapto is expected to house 19 350 of the dwellings. Urban renewal of 7 major towns, 3 major regional centres and 1 regional city is meant to contribute to high density housing.

#### Identification of sustainability criteria identifications include:

Infrastrucutre provision	Housing Diversity	Avoidance of Risk	Environmental Protection
Access	Employment Lands	Natural Resources	Quality and Equity of Service

The strategy appears to be good regarding the emphasis on:

Biodiversity Asset Protection	Agricultural land protection	Sustainable development	Avoidance of building in flood prone areas	Avoidance of innappropriate location for development
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**The strategy is a concern for several reasons:**

Natural Resources	Employment Land	Agricultural	Housing	Economic Development and Transport	Air, Water, contamination, energy, climate change
Doesn't include Sandon Point even though it hasn't been rezoned as yet	Includes Shell Cove Marina which should instead be a natural resource	Leaves open Calderwood for residential development as a 'back up'.	Wollongong has seen residential development already.  Areas such as Sandon Point should be protected.	Cannot continue to rely on housing development long term. Hi tech, high skills, high research, clean green innovative projects can be the key.	A overall strategy needs to be looked at regarding all the sources of air pollution in the Illawarra.
Doesn't include South Shellharbour Beach and its wetlands	Includes promoting and protecting Wollongong Airport without genuine aircraft noise mitigation measures		West Dapto development	Public Transport needs to be active and geared towards community need	There needs to be education and consultation regarding the options for water recycling and water tank systems in house. <u>Floodplain land should be mapped.</u>
Promotes protection of Lake Illawarra, but still promotes further development around it			Shellharbour has already seen massive residential development in Albion Park, Flinders, Tullumbah, Shell Cove etc.		More effort needs to occur regarding real actions towards climate change.
<u>Willingness to off-set protection of one area at the expense of another</u>					A map of all contaminated sites in the Illawarra needs to be enclosed in the strategy, including abestos.

Estimated 830 ha endangered ecological communities occur in zones for urban development-protection where appropriate					
The regions costline has estuaries, coastal lakes and wetlands of high conservation value for aquatic biodiversity-little is protected in conservation reserves					

### Some General Planning Issues in the Illawarra

<b>Wollongong Council jurisdiction:</b>	Sandon Point is under threat of development despite Aboriginal and ecological significance.	Port Kembla industrial land is expanding and is too close to residential lands. A buffer is needed.
	Lake Illawarra is having increasing developments around it impacting on it	Tallawarra could be renewable energy driven particularly in light of global warming concerns
	Wongadilly should have a buffer surrounding it to keep a village perspective	Spot Rezoning. Wollongong Council wants to re-classify community land to operational land. Eg. Darcy Wentworth & Thomas Gibson Park.
	Bulli Brickworks	
<b>Shellharbour Council jurisdiction:</b>	Wollongong Airport is impacting on residents both in terms of noise and finances. Noise abatement procedures need to be apparent.	South Shellharbour Beach and its wetlands should be protected as a natural resource.
	Shellharbour Council appear to want to continue to develop Albion Park	Shellharbour Council wish to develop what appears to be dairy farm land west of Wollongong Airport for a business park
	Shellharbour Council appear to want to	

	develop agricultural land at Calderwood	
<b>Kiama</b>	There is a push to develop an aged care facilities at Jambaroo	

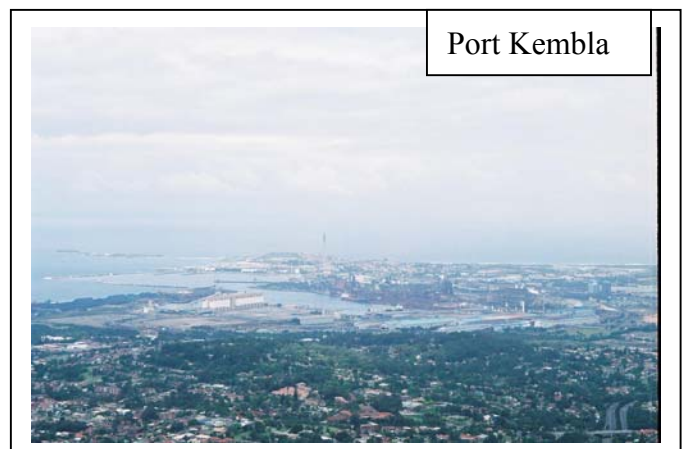
## Regional Transport

Public Transport needs to be improved to cater for community needs.

## Housing and Settlement

Major residential development has already occurred in Shellharbour. It is unclear how much the Illawarra can really handle without major impacts occurring. With major drought still looming over New SouthWales, however, parts of the Illawarra need to be maintained as a green belt, at a level it can, and protected for food supply. This will have to be at the expense of new residential development.

Residential development, at all levels, should also maintain a buffer zone between it and industrial areas to improve the health and well-being of the community.



## Cultural heritage

The Illawarra area is loosing cultural heritage. This includes Aboriginal and non-Aboriginal culture. Sandon Point is just one example.

## Rural landscape and rural communities

It is heartening to see that there is an emphasis on the rural agricultural sector. The idea, however, of 40-hectare minimum lot size may not be enough to protect fragmentation and encourage food production. This needs to be expanded to include incentives of some kind to continue food production on the land. Villages such as Wongadilly should also have buffers around it to maintain its village atmosphere.

## Natural Hazards

A federal department of Environment and Heritage document suggests that the effects of global warming include, higher temperatures, altered rainfall conditions, and more frequent or intense extreme events (heat, drought and storms): Climate Change Impacts and Risk Management: A guide for business and government. An Australian Climate Group (comprised of IAC, WWF, and university academics) report adds rising sea levels to this: Climate Change-Solutions for Australia. A National Coastal Vulnerability Study report prepared for IAC estimated the number of households that will be affected by rising sea levels of up to 6m within 3km inland. It states that the number of Illawarra households affected by rising sea levels will be 9,220 for households below 4m, 12,294 for households below 5m and 15,367 for households below 6m.

Climate change is said to be brought on by an enhanced greenhouse effect. This attempts to describe the addition of man made CO<sub>2</sub>, methane and nitrous oxide to the gases already in the atmosphere at concentrations which traps heat the detriment of earth. This is brought about through burning fossil fuels (coal, oil, and natural gas).

In another department of Environment and Heritage document entitled Climate Change Science: Questions Answered, global warming is suggested to be a reality due to:

- The Global average temperature already rising by 0.6 degrees
- The Ten warmest years on record have been since 1990
- An Increase in heatwaves, warming of the lower atmosphere and deep oceans
- Fewer frosts
- Retreating glaciers and sea ice
- A Rise in sea levels 10-20cm
- An increase in heavy rainfall in some areas
- We could see an increase between 1.4-5.8 degree c over the next century

Besides the strategy determining that global warming is a natural hazard it advances a plan that will exacerbate it. This is due to an understanding that global warming is man-made and is determined by our actions. This includes the action of constructing a CO<sub>2</sub> emitting power station at Tallawarra, the protection of a CO<sub>2</sub> producing airport, the promotion of increased shipping, the excessive increase in the use of finite resources for excessive housing development which will increase the amount of cars utilised in the Illawarra which will provide more pollution. This topped with the likely destruction of biodiversity along with the destruction of rural land for food production doesn't make planning sense.

Although aircraft noise is the usual source of complaint regarding airports, aircraft are also polluters. Jets, in particular pollute the atmosphere at its most sensitive region and produce nitrous oxide with its vapour trails that exacerbate the greenhouse effect. Because of this type of impact there is debate over the extent of greenhouse effect it produces. What is known is that air travel is becoming one of the fastest growth areas for pollution. Regardless of the fact that aircraft are excluded from the Kyoto agreement there is talk in Britain that the amount of domestic flights will need to be decreased in order to meet Kyoto benchmarks.

The strategy also promotes the proposed Shell Cove Marina as employment land but neglects to mention that it occurs along the coast and could be affected by rising sea levels.

The strategy states that The NSW Coastal Policy (NSW Government 1997) 'requires coastal hazards to be managed in an ecologically sustainable way and promotes a precautionary approach to decision making'.

There would be community groups, particularly dealing with the Sandon Point proposed development that would feel that this is being ignored particularly due to flood concerns even without considering rising sea levels. The Shell Cove Marina should also be assessed in terms of climate change and rising sea levels regarding a Floodplain Risk Management Plan. Floodplains need to be mapped in the strategy.

There are also concerns with the Shell Cove Marina regarding removal of contaminated soils, their suggested mode of remediation, along with the process and eventual use as infill for a soccer field.

In Yallah, Coal wash, has made a natural hazard into a man-made one. Areas of man made contamination in the Illawarra also need to be mapped with the strategy, particularly in relation to asbestos. A greater improvement in planning needs to occur.

## **Action**

- **Global Warming considerations should be the first dictate regarding development**

## **Water, energy and waste**

The strategy talks about the need to consider global warming issues but isn't extensive enough for such a major planning obstacle. The strategy discusses water and solar power but doesn't suggest in-house water tanks or solar panels or possible subsidies for them. It also doesn't discuss education in terms of energy or water including recycling.

The strategy also discusses support for renewable energy projects such as 'wind, solar, bio-waste and wave power' and yet states the development of a gas-fired power station in Tallawarra. It is understood that the company undertaking the project also deals with renewable energy, but it is more expensive. The government could take the long-term vision of supporting green energy alternatives now and push for an alternative to gas which is CO2 emitting and a concern regarding greenhouse effects.

In terms of waste, as suggested, areas of contamination need to be mapped regarding the strategy.

## **Action:**

- **Renewable energy projects need to take precedence over fossil fuel energy, including gas**
- **Contaminated lands need to be mapped**

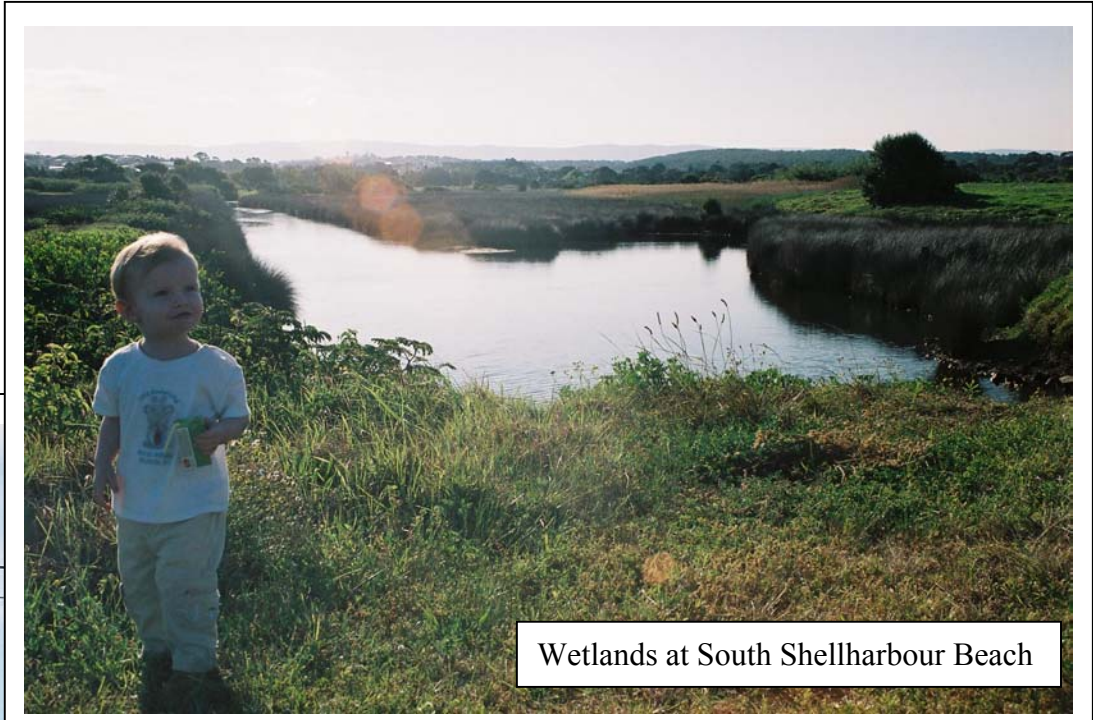
## **Economic Development and Employment Growth**

The strategy has suggested that it will undertake an Employment Lands Guidelines document. The guidelines should scrutinise proposed employment land in terms of 'best benefit' and 'appropriate development area' as well as 'financial logic'. In all these areas Wollongong Airport and the proposed Marina would fail.

There are areas of biodiversity and natural beauty in the Illawarra that should be maintained and if necessary could be utilised for tourism. The suggested employment land of South Shellharbour Beach and its wetlands is a prime example. The area cannot continue to rely on housing development long term. Clean green Hi tech, high skills, high research, innovative projects, and education can be the key.

# EMPLOYMENT LAND:

## Wollongong Airport & South Shellharbour Beach



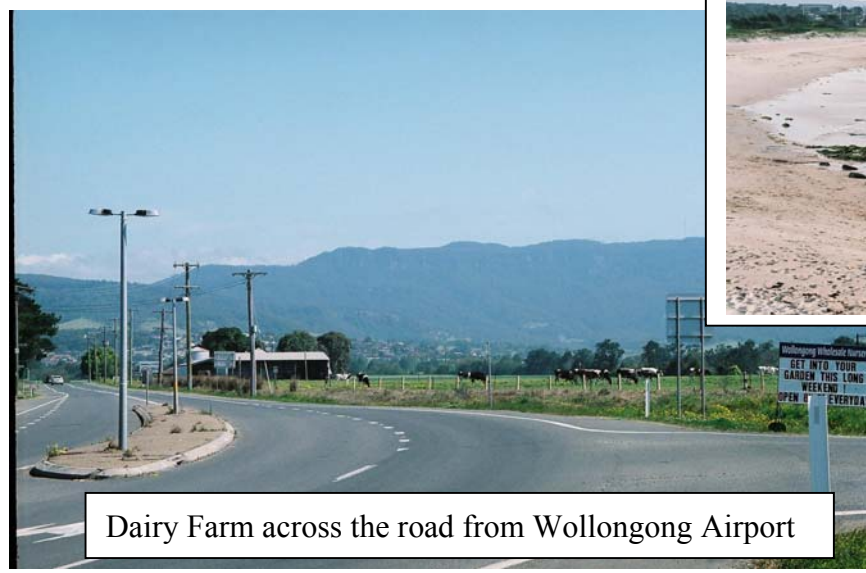
Wetlands at South Shellharbour Beach



Runway ↴



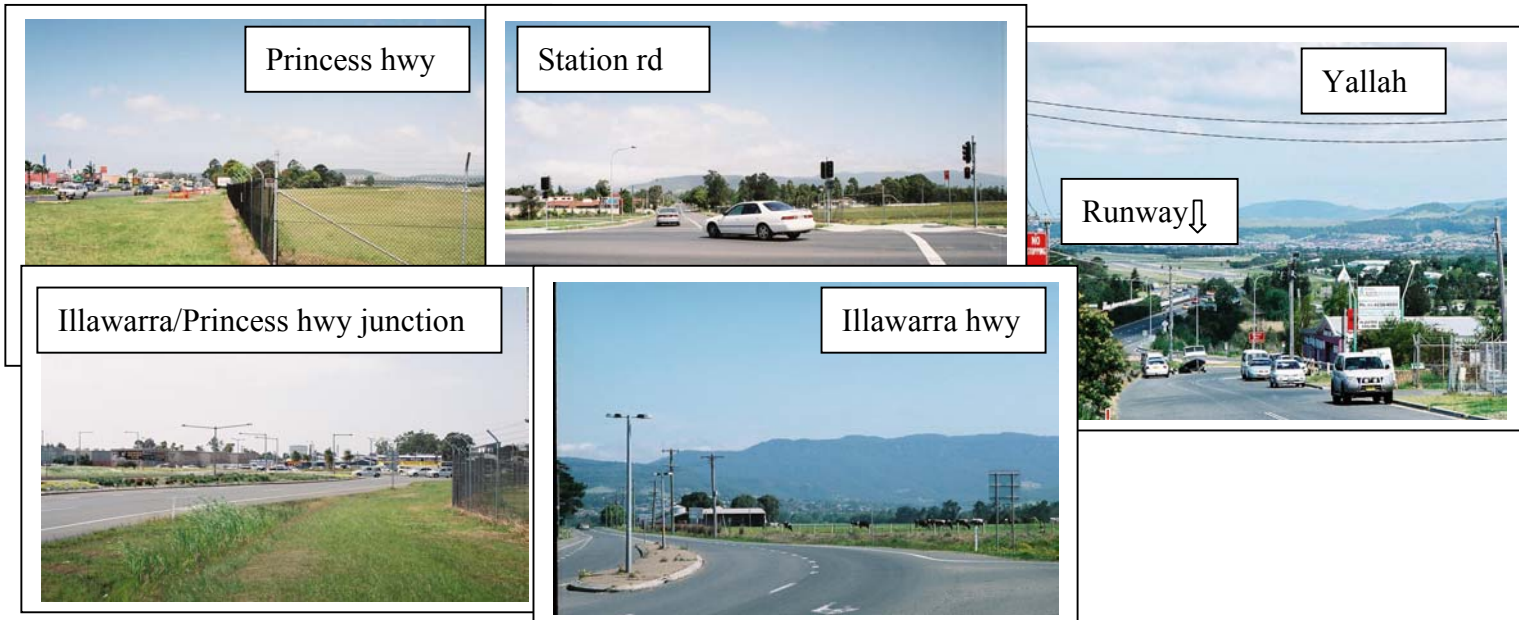
South Shellharbour Beach



Dairy Farm across the road from Wollongong Airport

## INNAPPROPRIATE NON SUSTAINABLE DEVELOPMENT:

According to the 1996 Aircraft Noise Report, Wollongong Airport covers 117 ha and includes two runways with associated taxiways and aircraft parking aprons. The east-west runway (08-26) is 1350m long and 30m wide. The north south runway (16-34) is 1827m long and 30m wide. At the time the airport was geared to accepting aircraft that weighed up to 5.7 tonne in weight.



Wollongong Airport is bounded by the Princess Highway, Illawarra Highway, Tongarra and Station Road. In addition to this, the airport is said to have residential areas of Albion Park Rail, Oak Flats and Albion Park bordering it on its eastern and southern sides. Residential and agricultural properties do adjoin the airport. One example of residential properties occurs along Poplar Ave near the Princess and Illawarra highway junction.

Wollongong Airport has continued to see itself as a development in an inappropriate location due also to the fact that both Wollongong and Shellharbour City councils have increased the housing density in suburbs surrounding it towards the airports north west side in areas such as Hawards Bay in Yallah. Albion Park has also seen new and extensive residential development. Now parts of Calderwood are under threat.

Last year Shellharbour Council significantly increased the strength of the main runway pavement to allow for aircraft in excess of 20 tonnes to utilise the airport, compared to the 5.7 tonne aircraft the airport was geared



towards. This amount of strength exceeds the tonnage that appears necessary for regional airlines. The runway, however, was being being damaged by heavier HARS aircraft.

On site the airport has been noted as being zoned ‘5(a) Special Uses (Aerodrome) and 4(a3) Airport Light Industrial’ under Shellharbour Councils Local Environmental Plan. The aim of the special uses zone relates to ‘community facilities and services’. Off site, land use surrounding the airport is meant to take note of the Australian Noise Exposure Forecast (ANEF 2020). Council is also meant to consider its ANEF 2020, and its relationship to the Environmental Planning and Assessment Act, when undertaking airport development. The significant runway upgrade, HARS, and other developments, however, were undertaken without genuine community consultation or participation or environmental assessment, or the instigation of an aviation control tower.

### **Employment Land**

An aeronautical industry cluster was recently built at Wollongong Airport costing council in excess of a million dollars. Light Aviation industries, therefore, already exist at the airport on site and in 2005 continued offsite with an amendment to the Draft Shellharbour Local environmental Plan to extend the 4(a3) Airport Light industrial zoning into 2(a)



Residential zoning along the Princess Hwy. It would be unclear why further off-site land would be needed for light aviation industries.

If the State Government and Shellharbour Council, however, were genuine with suggesting that Wollongong Airport was Employment Land then Shellharbour Council should have carefully considered their push for their new principles of long term leases (especially the 20-25 year leases) at the airport last year. This includes one lease at an annual amount of \$1 for 25 year lease. In addition to this, they should have diversified leases to include non-aviation businesses.

Bankstown Airports Masterplan, for instance, indicated that it produced more profit from non-aviation related activities than aviation. Under the heading of ‘Current Operations and Business Context’ it is stated on page 36 that:

*‘In 2002/2003 BAL generated revenue of 10.8 million dollars. Of this, around 13 per cent was generated from aviation and aviation related activities, while 80 per cent was generated by property activities and a further 7 per cent from other activities (retailing and other management fees).’*

In its submission to the ‘Review of Price Regulations for Airport Services’ BAL also noted that its aeronautical revenue does not currently cover aeronautical costs: 12 July 2006. It should be noted that Bankstown Airport has been previously known as the fifth busiest in the world in terms of aircraft movements. It has also

been known as the busiest in Australia, also in terms of aircraft movements, competing against Jandacot Airport.

Shellharbour Council have also seen costs override revenue at Wollongong Airport. In 2004/2005 it only received around \$75,144.63 in net operational revenue and yet spent in excess of \$2 million dollars significantly upgrading the airports runway and constructing an aeronautical industry cluster. In 2005/06 net operational revenue was again depleted due to capital expenditure, leading the airport again into deficit.

Wollongong Airport has been suggested to be a regional facility and yet Shellharbour Council and its residents paid millions of dollars for its upgrade while Shellharbour Council requested a 9.5% rate rise variation in the last two years. It was permitted a 3.5% and then 9.5% rate rise.

Council have stated in its submission to the department that 'it provides employment through its airport business cluster and tourism through HARS'. As already mentioned, the aeronautical industry cluster cost council over a million dollars, and new leasees were provided a rent free period of three months. HARS primarily depends on volunteers and has been financially supported by council. Its aircraft damaged the

main runway and necessitated a significant runway upgrade that may not have been necessary, to the degree of strength it was constructed, if it was just for regional airlines. HARS also requested and received a hardstand, while council also provided

works on its museum base, at a cost of \$262,824.10 in 2002/2003. In addition to this a road was also constructed to the HARS facility, and council waived related significant s.94 fees on two occasions for HARS, as well as donated sand to it for a foundation for one of its hangers.



Employment generation did not have to be aviation specific at Wollongong Airport, and probably would have led to more job creation for community members and less noise and air pollution issues if it wasn't.

### ***Employment Land Protection/Residential Land Protection***

There has been absolutely no discussion about protecting the residents surrounding the airport from its noise and pollution emissions. If the airport continues to impact on residents then residential properties adjoining, surrounding it, along with those affected by its flightpath may need to be compensated to allow for residents to relocate.

New residential developments that will be foreseeably impacted on by flightpaths should cease. These particularly include land in Hayward Bay (Yallah) areas that

may have aircraft noise affectations included on their s.149 property certificates. If this does not occur then all the problems in the Sydney basin, which have already started to occur in the Illawarra, will increasingly burden and impact on on the community at a increasingly larger extent. This would occur both in terms of the amount of impact and amount of population affected.

**Non-Residential Noise Buffer Zone:**

Some non-residential areas (or buffers) continue to exist around the airports western side due to dairy farming along the Illawarra



Illawarra Hwy



Farm adjoining airport

Highway between the Princess Highway and Tongarra Road. This should be protected as ‘rural and natural resource areas’ as well as ‘Biodiversity outside Conservation Areas’, as appears on the map in the draft Illawarra Regional Strategy.

Shellharbour Council, however, are now pushing for a business park to be developed on dairy farm adjoining the airport. Besides flood issues along the Illawarra Highway during heavy rain this would be a great loss of dairy land and food production. Something that contravenes the Draft Illawarra Regional Strategies emphasis on protecting agricultural land and food production.

Genuine noise buffers are also required particularly for the departure and arrival flightpath routes. The one towards Albion Park in the form of a sporting complex, off the main runway, is insufficient particularly for the regional airlines such as Qantaslink due to its size. It is not uncommon to see aircraft ignoring the defacto easement along this route and overfly houses, while the larger aircraft impact on noise quality in the area regardless of utilising an easement due to their heavier nature. Sydney Airports Masterplan for 2003/2004 noted on page 24 of the Sydney Airport Corporation Limited background section that noise abatement procedures were applicable to Wollongong Airport due to the noise sensitive areas towards the west and the south. Such noise abatement procedures need to be more apparent and applicable to the area.



Heavier aircraft are innappropriate for this area. HARS aircraft such as the

SuperConstellation should never have been permitted to relocate to the Illawarra only to need a significantly upgraded runway which council undertook without genuine public participation or environmental assessment.



## PLANNING DOCUMENTS

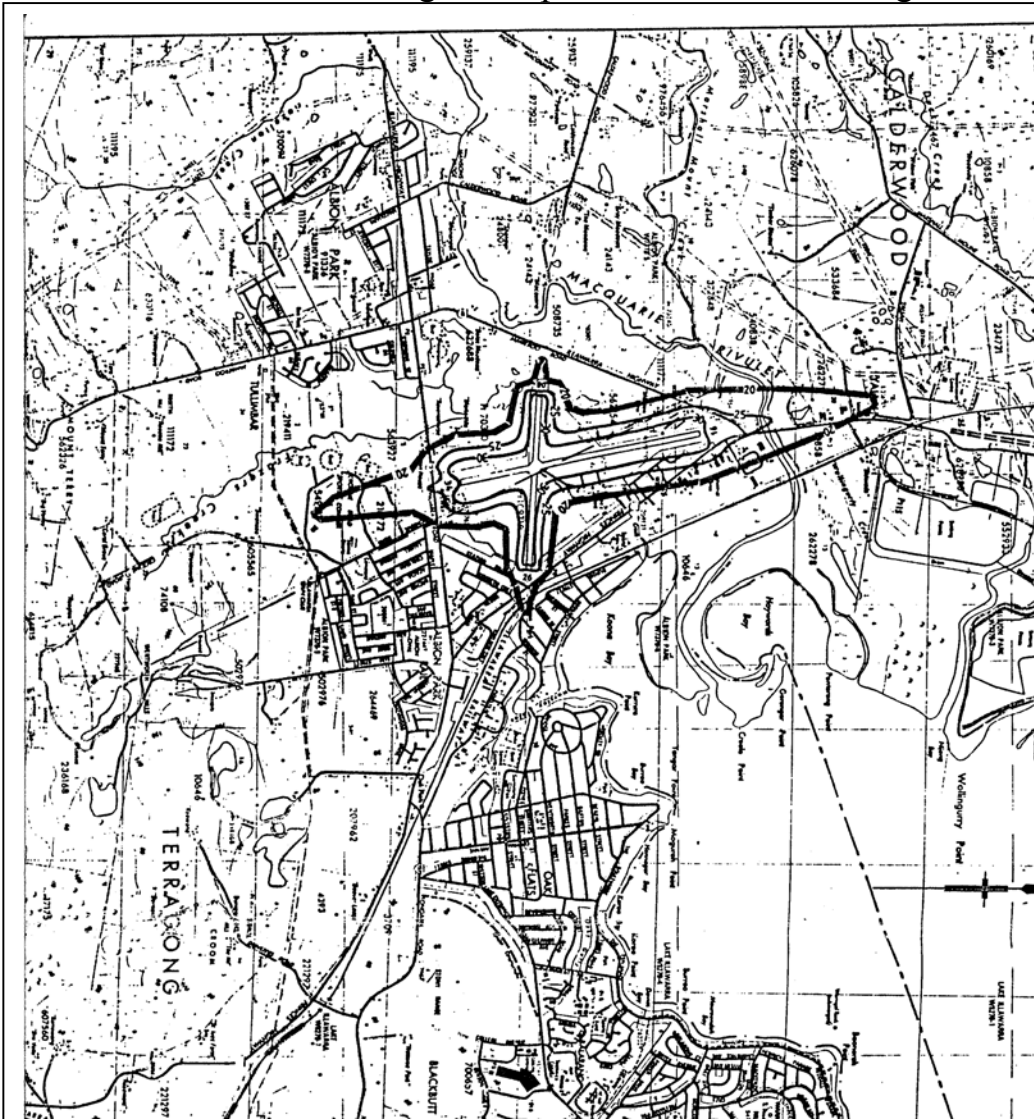
A 1996 Aircraft Noise Report was undertaken for the airport that includes an Australian Noise Exposure Forecast 2020. The Report states that:

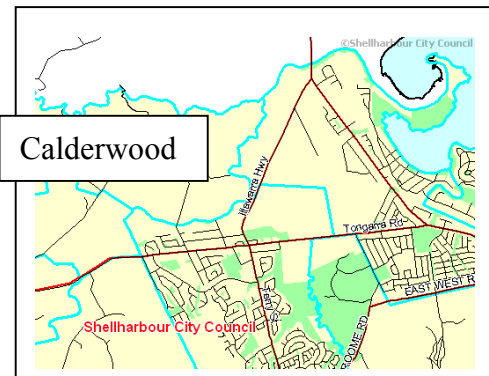
*'The ANEF is to be used as the basis for future land use planning adjacent to the the airport and to assess the impact on land development from proposed airport operations.'*

The report also stated that in preparing the ANEF for the airport that 'a number of physical and practical limitations exist. The high terrain of the escarpment limits the manoeuvring area available for aircraft using the airport and precludes the use of the airport in its current configuration, by large domestic aircraft. Furthermore, existing roads and residential areas to the north, south and east of the airfield exclude the development of the airfield in these directions...Practically speaking, the proximity of the airfield to Sydney, coupled with the available surface transport (road and rail) between the Illawarra region and Sydney, implies that it is unlikely that a demand for international or domestic services would be sufficient to warrant an expansion of the existing airfield.'

Despite the ANEF stating this in the planning document, council, significantly upgraded the runway. It did so with an outdated planning document and genuine community participation. One of the obvious reasons why the planning document was outdated was the lack of inclusion of the increasing housing density in the suburbs surrounding the airport. Council's lack of genuine regard for this planning

document and its association with the Environmental Planning and Assessment Act in relation to undertaking genuine environmental assessments is also a concern. The strategy should take this opportunity to include the aircraft noise zones, at the very least from the 1996 Aircraft Noise Report, as an attachment on an updated residential map. This would seem only prudent if the airport has a





suggested new zoning. It would also seem prudent that the strategy take an interest in flightpaths to ensure noise mitigation factors are being genuinely looked at. Although the delfin land lease (DLL) rezoning proposal in Calderwood doesn't appear to adjoin Wollongong Airport the



suburb of Calderwood appears to boarder the Illawarra Highway. This area hosts a working dairy farm. Areas such as Calderwood need to be protected overall not only for agricultural reasons but also an ongoing non-residential aircraft noise buffer with the possibility of aircraft departures occurring in its direction. Urban expansion is already beginning to encroach towards this part of the Illawarra hwy from the Yallah direction. Hawards Bay in Yallah should also be kept as a buffer for flightpaths and its residential growth restricted. The defacto easment in the Albion Park direction should be seriously looked and only utilised by appropriately sized aircraft.

### **AIRPORT EXPANSION/FUTURE DIRECTION**

Noise complaints and safety concerns are already occurring within the Shellharbour and now Wollongong jurisdiction regarding aircraft operations.

Wollongong Airport expansion has occurred without genuine community consultation and participation, genuine information distribution regarding flightpaths, the provision of noise monitoring, noise installation, compensation for nearby residents, or the instigation of an air services airport tower. The last two years have appeared to be in financial deficit while council requested rate rise variations and received a 3.5% and 9.5% rate rise respectively.

Council have also provided major assistance to aviation businesses such as HARS.

In light of this, the state government and council should consider either airport growth restriction or compensation and relocation for surrounding residential areas and then implement a genuine non-residential aircraft noise buffer zone. The instigation of environmental controls for further afield would also be helpful regarding flightpaths, movements, and a curfew.

See also 'Business Park' under Rural

### **ACTIONS:**

**The strategy should:**

- **At the very least, attach a reliable ANEF**
- **Take note of flightpaths and noise mitigation issues**

- **Protect the area west of Wollongong Airport as agricultural land.**
- **Protect areas such as Calderwood as a non-residential aircraft noise buffer zone and possible departure route**
- **Restrict residential development in Yallah as an aircraft noise buffer zone and possible departure route**
- **Restrict the size of aircraft using the airport. They should be appropriate to the area.**
- **Consider increasing the area of the defacto easement towards and in Albion Park.**

### **EMPLOYMENT LAND – SHELL COVE MARINA (BOATHARBOUR)**

Shellharbour Council have spent around 8 million to undertake the compensatory wetland (Myimbarr), pictured to the right, in order to destroy the wetlands along South Shellharbour Beach. There is still another 100 million to find for the boatharbour and 400 million of the boatharbour precinct. With only 1.2 million surplus for the estimated 1.5 billion dollar Shell Cove project the boatharbour component of the project does not seem viable, particularly at this present time. Breakeven projections aren't until 2008. Reports on Shell Cove continually discuss the slow and patchy



Nature of the general property market. It further states that fluctuations regarding surpluses/deficits for the overall project is typical. Projected profits, from the sale of land at Shell Cove, are not estimated to occur until the final stages with residential sales continuing for another 12 years. Council have undertaken a modification that appears to be more like a cost cutting exercise rather than one based on environmental concerns. Most recently council voted for a request to utilise s.94 funds for a project that doesn't have a tender, and therefore contravenes councils s.94 and work in kind policy, and is implicated in the remediation of contaminated land that is included in the Shell Cove Marina project, this employment land should be properly looked at. One must ask where will council obtain the proceeds from in the meantime.

Councils wish to develop this land and utilise it as employment land is extremely illogical. There must be more appropriate areas for this. The idea in Shellharbour Councils submission to the department of planning of a high tech businesses and corporate headquarter area is too fuzzy, while it is uncertain where the 6 hectares come from to deal with this.

### **Action: Reject South Shellharbour Beach as employment land**

#### **Natural Environment – Off sets**

So much biodiversity has already been lost in general. To suggest that the escarpment and a number of biodiversity corridors could be enhanced to ‘off set the loss of biodiversity that may occur through development elsewhere in the region’ is a major concern. All significant biodiversity should be maintained. One area should not have its protection used as a bargaining tool to destroy another.

#### **Natural Environment – Lake Illawarra**



Lake Illawarra is said to be a natural resource to be protected and yet states that it is under threat from urban and industrial run-off, ‘unless catchment management practices are in place to address the impacts of sedimentation and nutrient discharge’. The the strategy continues to state that the proposed West Dapto

development is within the catchment of the Lake and ‘will need to implement high standard water quality controls’.

Further pressure on the Lake is occurring through other developments such as Yallah, which includes coal wash fill, and the possible re-zoning around the Tallawarra power station which could be a combination of residential/industrial, as well as a car strapping development etc. It is difficult to see how so much development can be controlled to the extent that catchment management practices can address the impacts of sedimentation and nutrient discharge.

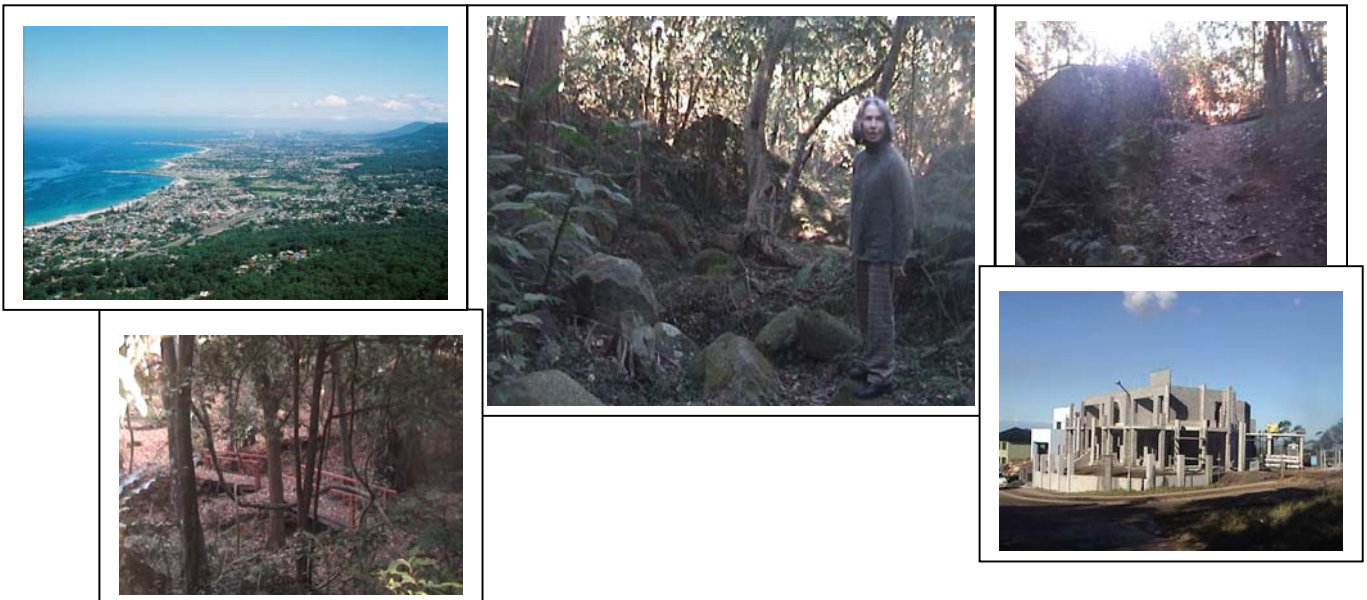
Yallah should have been left as a non-residential aircraft noise buffer for departures from Wollongong Airport. Such departures could have lent itself to leaving the immediate area over water and cause less environmental impact due to noise. Development at Yallah is therefore a twofold impact and should not have been consented to. Restrictions on development, however, is not too late.

## Natural Environment – Escarpment

The strategy notes that:

“The Illawarra Escarpment is a defining feature of the Region and contains one of the largest areas of rainforest in the Sydney Basin Bioregion. It also functions as a regional significant habitat corridor linking the Royal National Park with conservation reserves in the southern part of the Illawarra”.

Despite such seeming importance the escarpment continues to be threatened by residential development as shown below. There appears to be a COI in 1998 into future planning and management of the Illawarra escarpment which would have made recommendations. It would have been helpful to have its recommendations noted, along with further studies/reports resulting from it and its impact on the West Dapto development proposal.



### RIPARIAN CORRIDORS

Wikipedia suggests that a riparian zone is the ‘the interface between land and a flowing surface water body.’ It further states that they are important ‘biofilters, protecting aquatic environment from excessive sedimentation, polluted surface runoff and erosion.’ It further states that they ‘supply shelter and food for many aquatic animals and shade that is important part of stream temperature regulation.’ It is said that when such areas are damaged they can be restored. This is just one example of why biodiversity is therefore important in the Illawarra and can be rehabilitated in certain circumstances. ‘The strategy states that the region and its coastal waters support 95 threatened fauna and flora species, two endangered populations and 15 endangered ecological community, three of which are the habitat of several nationally listed plant species.’ Riparian corridors should be maintained and restored, including the Yallah Calderwood corridor. As mentioned, no offsets should occur. There is apparently a 2004 Riparian Corridor Management Study by DPNR. Its recommendations would have been helpful to include to comment on.

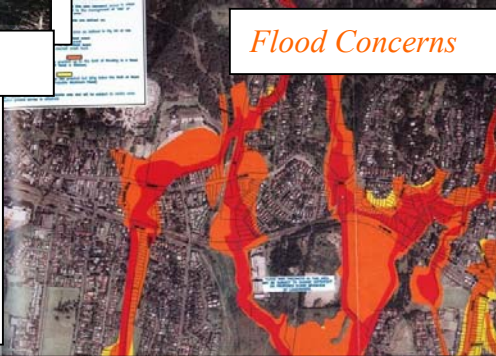
# Biodiversity Outside Conservation Areas (Sandon Point) Floodplain land



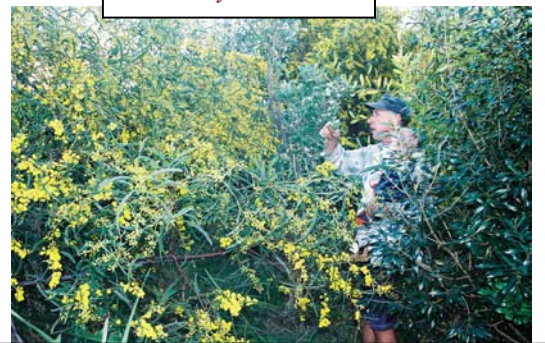
*Turpentine Forest*



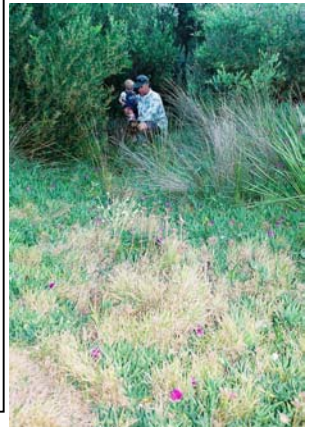
*Flood Concerns*



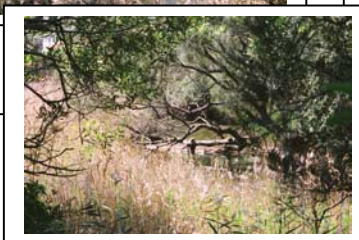
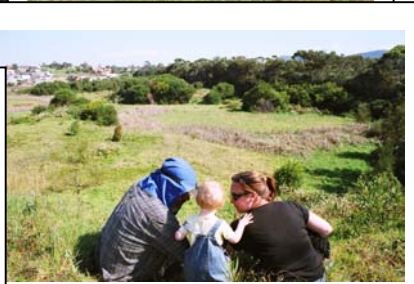
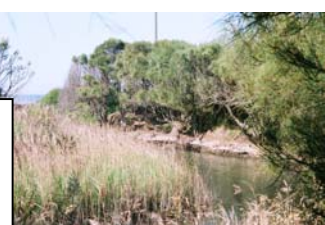
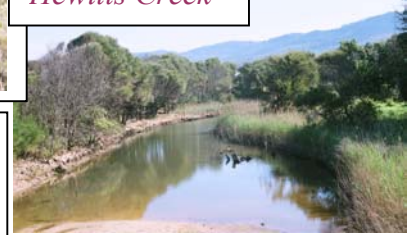
*Mcauleys Beach*



*Development changes the area*



*Hewitts Creek*



*Landscape images: Sonya McKay*

The above photos encapsulate what words cannot say. This land is caught in the middle of development on land that has flooding concerns. With so much biodiversity and natural resource to offer it is difficult to understand why this land is open to destruction particularly when it hosts Aboriginal and ecological significance across the site? It is also difficult to understand why a regional park couldn't cater for potential tourism.

The issue of development at Sandon Point has not been decided. Assuming that no pre-emptive legally binding decision has been made there is no reason why Sandon Point should not be considered as part of the Illawarra Regional Strategy.

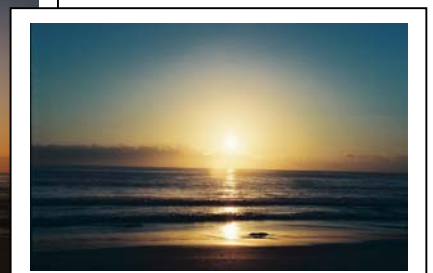
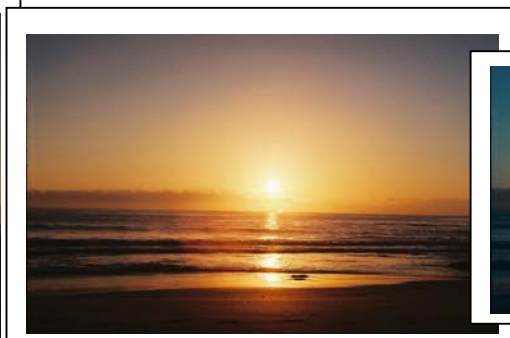
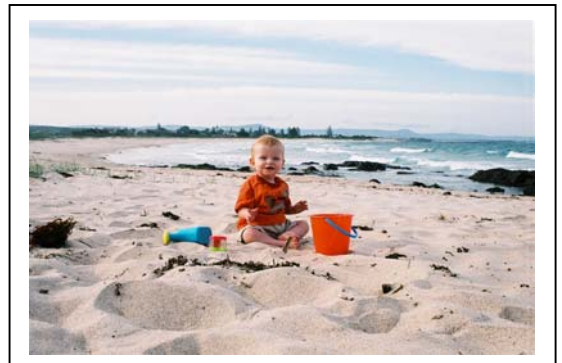
The strategy notes that the region also includes significant areas of habitat for many threatened fauna species, 'including the Sooty Oystercatcher, Green and Golden Bell Frog and Grey-headed Flying Fox.

No Species impact Statement was seen as necessary regarding the Green and Golden Bell Frog at Sandon Point even though the site is seen as suitable habitat for it, while an updated 7 part test was considered unnecessary regarding the Grey Headed Flying Fox even though it is said to overfly the Sandon Point site: Stocklands EA pg. 86. Surely the precautionary approach should be utilised in these circumstances and further assessments undertaken particularly in relation to the 7 part test.

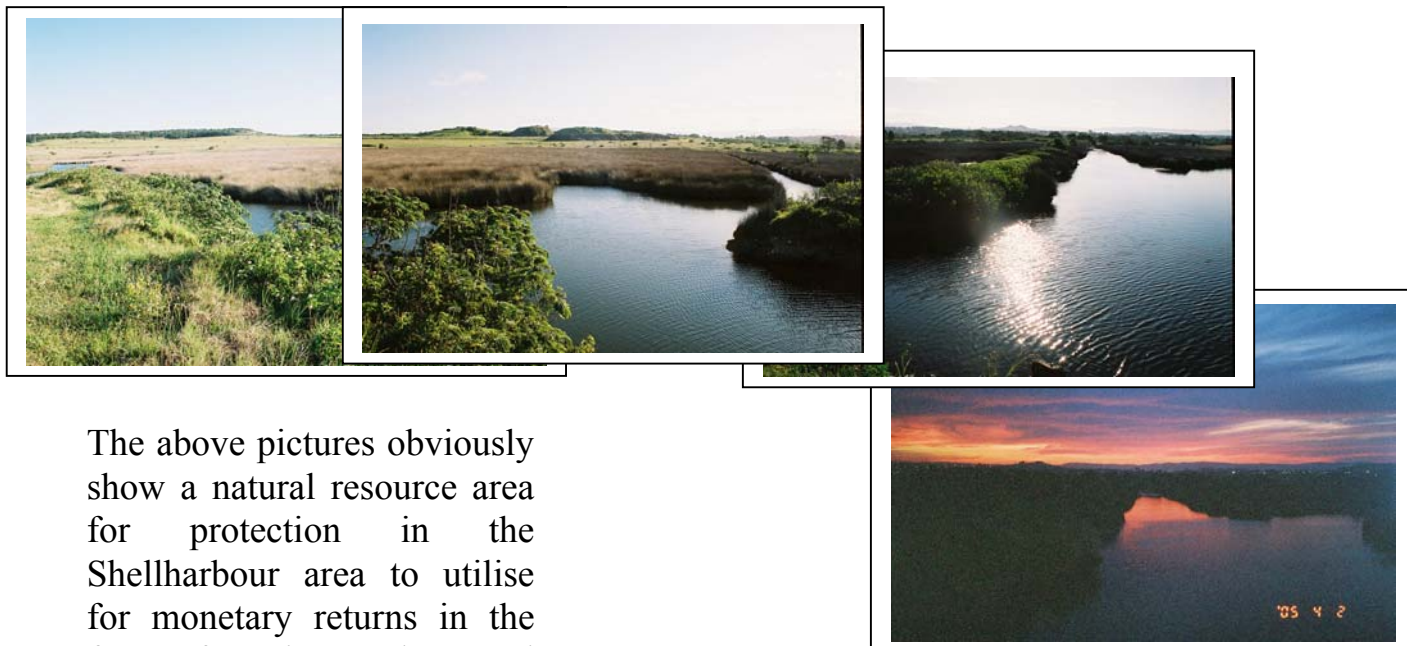
### **Rural and Natural Resource Areas – Biodiversity Outside Conservation Areas (Shellharbour Beach)**



The photos show the entrance to the proposed 300-350 berth Marina on the left and South Shellharbour Beach during the day on the right and sunrise below.



The following pictures show the wetlands, that were once formally designated as wetlands, during the day and at sunset. Cows have been seen on multiple occasions grazing just beyond the wetlands.



The above pictures obviously show a natural resource area for protection in the Shellharbour area to utilise for monetary returns in the form of tourism and general recreation for the area. It is difficult to understand why anyone would utilise 500 million dollars to destroy it.



**Action:**

- **Protect the natural resources of the area and zone**

**South Shellharbour Beach as Rural and Natural Resource Areas – Biodiversity Outside Conservation Areas**

**Rural and Natural Resource Areas – Biodiversity Outside Conservation Areas**

- **(Albion Park and Calderwood Residential Development)**

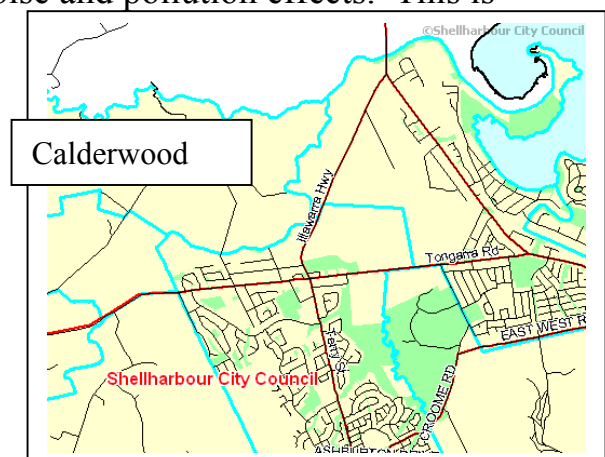
It is unclear why Shellharbour Council is wanting to decrease areas of ‘rural and natural resource areas’ – ‘biodiversity outside conservation areas’ in their submission to the state government, particularly when the Shellharbour areas has lost so much of this to major residential development in recent years. This would include, Shellharbour, Flinders, Albion Park, Tullumbah etc.

The draft Illawarra Regional Strategy states that Calderwood would only be developed if ‘regional growth projections show that the area is required to meet additional demands’. Calderwood should remain in agricultural protection and not be developed regardless in order to adhere to the strategies aim to protect agricultural areas and food production.

Shellharbour Council does not wish to keep the strategies map identification of it for ‘long-term agricultural and environmental protection’, or the lack of endorsement for any rezoning consideration until 2011 at least. It appears that council wish it to be a additional new release determined on housing lot production rates and investigate Calderwood as a ‘Special Investigation Area/Potential New Release Area’.

Calderwood is an agricultural benefit for food production in an area that has already lost much of its agricultural land to residential development, particularly in the new suburbs of Tullumbah and nearby Albion Park.

It should be considered ill-advised planning to continue residential growth areas in areas that could create a precedent for further development in the suburb in areas potentially affected by a growing airport particularly due to the enclosed escarpment area which magnifies noise and pollution effects. This is particularly so if a precedent for development continues towards the airport, along the Illawarra Highway. According to Shellharbour Council the Illawarra Highway is boarded by Albion Park, Calderwood and Albion Park Rail. The suburb of Calderwood is said to be the triangular boarder onto the road. The other side of the road has the airports east west runway in the direction of the Illawarra Highway.



- **Business Park**



Under the heading of ‘Economic Development and Employment Lands’ the strategy does mention clustering transport, freight and logistics around the airport. At the same time the strategy emphasises the strategic importance of agricultural lands in the south of Kiama and parts of Shellharbour under the heading of ‘Rural landscape and rural communities’. This is stated to be due to the

regions fertile soil and generally reliable rainfall.

Shellharbour Council are now pushing for a 35 lot business park to be developed on dairy farm adjoining the airport. Besides flood issues along the Illawarra Highway during heavy rain this would be a great loss of dairy land and vital food production. In this time of global warming and severe drought we may no longer have the luxury to develop such vital land in this way. The 52 ha site appears to also be home to sensitive wetlands.

There should also be extensive justification for this land to be developed in the light of a business park that was recently constructed literally minutes away from the now proposed business park. A business park that proceeded alongside controversy with, and at the detriment, of some businesses. This coupled together with airport expansion, and the proposed Marina, it is a concern as to how much our strategically necessary environment must endure in order to cater for employment for an increasing population. This kind of strategy is too little too late and should have been initiated years ago to address such issues, before the amount of residential development occurred through Shellharbour Council.

In general, proponents and their supporters should not be enabled to apply or support an application for state significance in order to fast track rezoning and subdivision. This appears, whether directly or indirectly, to be a deliberate erosion of due process at some level.

One should wonder with this proposal why the airport isn't considered sufficient by certain state elements to cater for an employment area.

**Action:**

- **Calderwood and Albion Park areas should remain as 'Rural and Natural Resource Areas' with 'Biodiversity Outside Conservation Areas' as identified in the strategy.**
- **If the area actively supported by Shellharbour Councils Mayor and State member for Kiama to be a business park is agricultural land then it should remain as 'Rural and Natural Resource Areas' with 'Biodiversity Outside Conservation Areas' and it would appear to be identified in the strategies map.**

## **Conclusion**

There are some hard decisions to make regarding the Illawarra and reliable leadership is necessary to make it. In this time of global warming, drought, and great uncertainty the government needs to emphasise the need for greater biodiversity and rural land protection. Our reliance on non-sustainable industries and development and the jobs at all cost mentality has to by necessity change for our childrens future.

## **APPENDIX, PG. 1**

### **REGIONAL STRATEGY AND SHELLHARBOUR COUNCIL SUBMISSION**

There are 4 main areas of concern with Shellharbour submissions to the department:

1. Wollongong Airport employment land protection particularly without a genuine and adequate non-residential aircraft noise buffer zone and the increasing impact of noise and pollution on residents from airport operations, and the lack of genuine environmental protection for residents surrounding the airport.
2. Marina employment land protection particularly in the face of the proposed destruction of wetlands at south Shellharbour Beach that could instead be preserved and act as a natural resource utilised particularly for tourism
3. Albion Park urban expansion in the face of Wollongong Airport employment land protection as well as increasing noise and pollution impacts from Wollongong Airport
4. Calderwood urban expansion in the face of Wollongong Airport employment land protection as well as increasing noise and pollution impacts from Wollongong Airport and particularly in light of possible agricultural and food production benefits.

#### **Primary Purpose of Strategy**

‘The primary purpose of the Regional Strategy is to ensure that adequate land is available and appropriately located to sustainably accommodate the projected housing and employment needs of the Region’s population over the next 25 years.’

The words ‘appropriately located’ and ‘sustainably accomodate’.

The strategy has suggested that it will undertake a Employment Lands Guidelines document. In my view Employment land should be strutinised by state and council governments as to ‘best benefit’ and ‘appropriate development area’ as well as ‘financial logic’. In all these areas the airport and Marina fail.