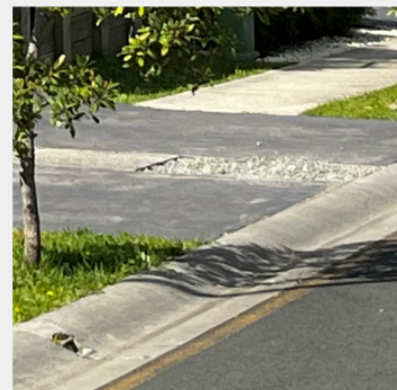
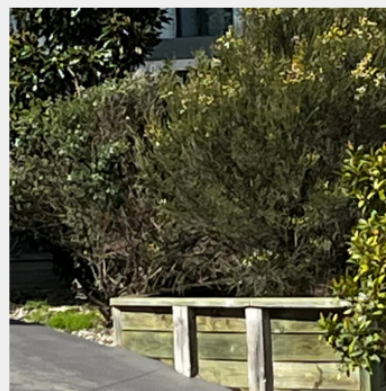
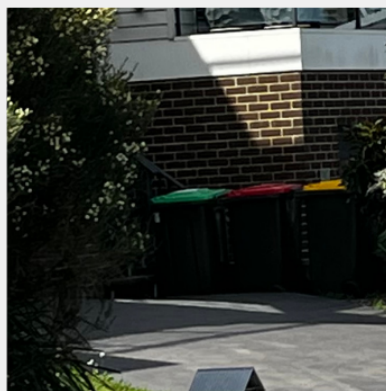


Review of

Draft Kiama Growth & Housing Strategy

Prepared for

**KIAMA MUNICIPAL
COUNCIL**



Acknowledgement of Country

This report has been prepared on land of the Wodi Wodi. We acknowledge the Country of the Dharawal and Dhurga speaking people whose rich cultural heritage and enduring connection to the land are integral to the context of the work we do.

DISCLAIMER

While Miller Street Consulting endeavours to provide reliable analysis and believes the material it presents is accurate, it will not be liable for any party acting on such information.

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Summary

A review of the draft Kiama Growth and Housing Strategy has been undertaken to identify opportunities for improvement as the draft progresses to a final.

The review has been conducted with a focus on 4 key areas, being current policy and legislative frameworks; readability and clarity of the structure of the draft Strategy; relevance and robustness of the draft Strategy's capacity analysis; and the actions and implementation plan included in the draft Strategy.

The draft Strategy is a long strategy, and combined with the lack of a clear document structure has resulted in the key narratives and outcomes from the draft Strategy not being as prominent as it should be. While there is good content in the draft Strategy (for example 'Our Priorities' and 'Growth Considerations'), there is a lack of evidence, referencing or links to the priorities being implemented.

The draft Strategy is written with inflammatory statements and does not own its responsibility under the National Housing Accord to deliver on the 5-year housing target.

The draft Strategy identifies 39 actions across three themes (advocacy, planner and regulator, and collaborate and monitor). Twenty-two of the actions are identified to be completed between now and end of 2025/26. The timeframes allocated to the actions lack structure, with 8 different categories. Most of the actions (22) are identified to be completed between now and end of 2025/26.

A summary of the findings of the review are:

- The draft Strategy is lacking an overarching structure, is too long, and lacks a cohesive narrative.
- The draft Strategy's evidence lacks credibility and is not adequately referenced.
- The draft Strategy does a poor job of articulating the evidence supporting Council's housing supply, including evidence to support its claims that the LGA can meet the 5-year housing target.
- The draft Strategy does not clearly articulate how the LGA will respond to demand over the longer term (20+ years).

- The draft Strategy lacks transparency regarding the EOI process and criteria.
- Actions in the draft Strategy lack clarity, are duplicative, and are difficult to measure success. In addition, the timeframes allocated to the actions are complex and don't span the time until the next 5-year review.
- The draft Strategy lacks clarity on how the strategy will be reviewed and monitored.

Building on the findings from the review, 23 recommendations have been prepared. A summary of the key recommendations has been provided below.

- Provide more detail to articulate housing supply include the spatial distribution, temporal expectations (5-year, 20-year) and housing type (infill, centres, greenfield). Consider the use of graphs and tables.
- Reduce the overall length of the strategy by focussing on housing issues, reducing duplication, and considering moving excessive contextual information into appendices.
- Include a complete set of references in the strategy to support evidence base.
- Clearly articulate (using evidence and by addressing inconsistencies in narrative) how Council is able to meet the 5-year housing targets and 20-year dwelling demand.
- Improve centre narratives by including more data (particularly for Kiama town centre), being clear around feasibility challenges, and providing more detailed discussion in relation to opportunities.
- Include the criteria used to determine/assess the EOI's in the strategy to improve transparency.
- Introduce a structure to the actions that creates clarity on which actions are business as usual and which are delivery-based actions that have a start and end to them. Include clear and reasonable timeframes.
- Improve clarity and understanding of how Council will monitor progress of the strategy with an emphasis on data availability. This should consider potential performance indicators for the strategy.

A tracked change word version of the draft strategy has also been provided to Council with additional detailed comments for consideration, including opportunities to improve clarity, readability, and robustness.

1. Introduction

Kiama Municipal Council have developed the draft Kiama Growth and Housing Strategy (draft Strategy) which aims to ensure the LGA has the right amount of housing, of the right type and size, in the right place and with the right tenure for the local community.

The draft strategy seeks to set a path of action for growth and housing in the LGA through to 2044. It includes actions and proposes a monitoring and review framework to enable housing choice, diversity and affordability to meet the current and future needs of the community.

Review of the draft Strategy

Miller Street Consulting have been engaged to undertake a peer review of the draft Strategy to guide Council in its effort to finalise the Strategy. Specifically, this work has sought to:

- Review the draft Strategy against a selection of current policy and legislative frameworks
- Review and analyse the draft Strategy's structure for readability and clarity, including comparison against the Department of Planning, Housing and Infrastructure's Local Housing Strategy Guideline
- Review the draft Strategy's identified capacity analysis (theoretical and feasible) to ensure it is presented and analysed in a robust manner and to give Council confidence in its use as an evidence base.
- Review the relevance of actions and implementation plan included in the draft Strategy, focussing on links to draft strategy objectives, level of impact.

Recommendations have been provided as an outcome of the review.

2. Policy environment

A review of the draft Strategy has been undertaken against an agreed list of relevant legislation, policy and guidance. The agreed list includes:

- Relevant provisions of Division 3.1 of the Environmental Planning & Assessment Act 1979
- Illawarra-Shoalhaven Regional Plan 2041
- NSW Department of Planning, Housing and Infrastructure's [Housing Strategy Guide](#)
- NSW Department of Planning, Housing and Infrastructures' [NSW Urban Development Programs: Guide for implementation in regional NSW](#)
- [Ministerial Statement of Expectations](#)
- NSW Department of Planning, Housing and Infrastructures' [5-year housing completion targets](#)
- Kiama Local Strategic Planning Statement 2020.

Findings

Environmental Planning & Assessment Act 1979

Division 3.1 of the Environmental Planning & Assessment Act 1979 recognises the critical role of councils in strategic planning for their local area.

The Environmental Planning & Assessment Act provides requirements for council in developing its Local Strategic Planning Statement and does not provide any direction on local housing strategies.

This, however, should not be read as legal advice and Council should seek independent legal advice in relation to this matter.

Illawarra-Shoalhaven Regional Plan 2041

The Illawarra Shoalhaven Regional Plan sets the strategic framework for the region, aiming to protect and enhance the region's assets and plan for a sustainable future. It is a 20-year land use plan prepared in accordance with section 3.3 of the Environmental Planning and Assessment Act 1979 and applies to the local government areas of Wollongong, Shellharbour, Kiama and Shoalhaven.

The Regional Plan informs councils' land use planning, informs the work of infrastructure agencies to plan for growth and change, and informs the private

sector and the wider community of the NSW Government's approach to creating a connected, sustainable, innovative and vibrant Illawarra Shoalhaven.

Actions, strategies and collaboration activities have been identified to implement the Regional Plan. Selected strategies from the Illawarra Shoalhaven Regional Plan and associated narrative relevant from the draft Kiama Growth and Housing Strategy has been include in Appendix A.

Collaboration Activity 8 from the Regional Plan is to *work with Kiama Municipal Council on the development of a Local Housing Strategy.*

Action 9 from the Regional Plan is to *develop a shared vision for the future of Bombo Quarry in collaboration with Kiama Municipal Council, landowners and the community.* Council's draft Strategy recognises this action and has outlined detail around the principles being used for the Bombo Quarry site in processes moving forward.

NSW Department of Planning, Housing and Infrastructures' Housing Strategy Guide

The NSW Government has prepared a Local Housing Strategy Guideline to support and guide councils to develop their local housing strategies. The draft Strategy identifies a methodology on page 9 which is not entirely consistent with the process identified in DPHI's local housing strategy guideline. The draft Strategy's consistency with the guideline is explored further in Chapter 3.

NSW Department of Planning, Housing and Infrastructures' NSW Urban Development Programs: Guide for implementation in regional NSW

The NSW Urban Development Programs: Guide for implementation in regional NSW provides a framework for managing land supply and coordinating infrastructure to support growth.

The Illawarra Shoalhaven Urban Development Program (UDP) has been operating for 4 decades and supports the work of the NSW Government in managing the supply of land and housing in accordance with the Illawarra Shoalhaven Regional Plan. It monitors the planning, servicing and development of new urban areas in Wollongong, Shellharbour, Kiama and Shoalhaven LGAs as well as the provision of housing in existing urban areas.

Council's draft Strategy identifies the need to continue to collaborate with the NSW Government on the UDP. It also identifies the greenfield development tiering structure as outlined in the UDP guide.

The draft Strategy replicates the tiering structure from the UDP guide (Table 4 in the draft Strategy). Council should engage with DPHI to ensure that it is representing and applying the structure correctly.

Ministerial Statement of Expectations

The Ministerial Statement of Expectations outlines how the NSW Government expects to ensure councils are accountable for their planning performance, and to better support councils to speed up their planning work with a focus on helping to deliver more housing.

The Statement of Expectations Order 2024 sets new benchmarks for council performance on development assessment, planning proposals and strategic planning. The expectations set out in the updated order include a requirement for councils to complete and carry out local strategic planning statements and local planning strategies, with a focus on delivering housing targets within time frames that DPHI specifies.

The Order states that:

Council should prepare a local planning strategy (such as a local housing strategy) to ensure the actions identified in the relevant regional or district strategic plan (including any dwelling provision targets), and local strategic planning statement, are delivered in accordance with the standards and timeframes identified by the department.

Council's draft Strategy's relevance to the Illawarra Shoalhaven Regional Plan has been discussed earlier in this chapter. In regards to the need to deliver on housing targets, Council's draft Strategy does not provide sufficient evidence to support the meeting of the 5-year housing target. This is explored further in Chapter 4.

NSW Department of Planning, Housing and Infrastructures' 5-year housing completion targets

The NSW Government has released 5-year housing completion targets for 43 councils across Greater Sydney, Illawarra-Shoalhaven, Central Coast, Lower Hunter and Greater Newcastle and 1 target for regional NSW.

The 5-year targets respond to the NSW Government's commitment under the National Housing Accord to deliver 377,000 new well-located homes across the state by 2029. Local, State, and Federal Governments are all signatories to the National Housing Accord. The draft Strategy does not take ownership of being a signatory, rather noting that *'the establishment of the Housing Accord and dwelling targets from the State Government has set clear expectations of the need for housing supply throughout Australia'*. The Housing Accord was established by the Commonwealth Government, not the NSW Government. All

three levels of government are signatories to the accord which requires the establishment of dwelling targets.

The 5-year housing target for the Kiama LGA is 900 new completed homes by 2029. The draft Strategy presents future dwelling demand for the same 5 year period as 441 new dwellings – 50% lower than the target of 900 (see Table 1 in the draft Strategy).

While the draft Strategy makes statements that indicate that this target will be met, the analysis is not presented in a way that proves this claim with evidence. This is explored further in Chapter 4.

Kiama Local Strategic Planning Statement 2020

Council has adopted the Kiama Local Strategic Planning Statement (LSPS) to establish:

- a 20-year vision for land use
- the special characteristics that contribute to local identity
- shared community values to be maintained and enhanced
- how growth and change will be managed into the future.

Key planning priorities from the LSPS relevant to this review include:

- PP1 Plan for and balance housing supply and demand
- PP2 Champion architectural excellence
- PP3 Connect the Municipality
- PP4 Support the delivery of required infrastructure
- PP14 Support and create vibrant places
- PP15 Identify and safeguard areas & items of heritage significance
- PP16 Celebrate and protect local character

Of particular significance, is the action identified under PP1, which is not referenced in the draft Strategy. The action is to:

Prepare and adopt a Housing Strategy, utilising the Department of Planning, Industry & Environment's 'Local Housing Strategy Guideline and Template', to detail how and where housing will be provided in the Municipality.

The draft Strategy has been prepared in line with Council's LSPS, building on from the opportunities identified in the LSPS. It is not clear, however, how the future housing opportunities identified on page 23 of the LSPS have been considered (or not) in the draft Strategy or if these sites remain as a future

housing opportunity (or not). This creates confusion and inconsistencies in the relevance of the sites, opening up potential challenges.

Recommendations

The following actions are recommended following a review of Council's draft Strategy against the current policy environment:

1. Continue to engage and collaborate with the Department of Planning, Housing and Infrastructure as the local housing strategy is progressed from draft to final to ensure that it is consistent with the requirements of the Regional Plan.
2. Should Council be concerned about the draft Strategy's consistency with the Environmental Planning & Assessment Act 1979, Council should seek independent legal advice.
3. Review the draft Strategy to ensure it is consistent with the UDP Program and the greenfield tiering structure.
4. Review the draft Strategy to clarify the reason for the difference between projected dwelling demand outlined in Table 1 of the draft strategy and the target of 900 new dwellings. Consider the need for the inclusion of the table at all.
5. Review the draft Strategy to support the claim that council can meet the target of 900 new dwellings by 2029 with clear and robust evidence.
6. Review the draft Strategy to clearly identify and address the future housing opportunities identified in Council's LSPS.

3. Draft Strategy structure

A review of the draft Strategy was undertaken with a focus on its structure, narrative arch and readability. To guide this review, the NSW Government’s Local Housing Strategy Guideline was used as a comparison, as well as other council’s local housing strategies that have been approved by the Department of Planning, Housing and Infrastructure.

The NSW Government’s Local Housing Strategy Guideline has been prepared to support and guide councils to develop their local housing strategies. The guideline, and the template included, provides a best practice approach to preparing and presenting a local housing strategy.

All councils within Greater Sydney are required to use the local housing strategy template. While councils outside of Greater Sydney do not have this requirement, use of the template and directions included are strongly encouraged.

The process of developing a local housing strategy as outlined in the guideline has not been a consideration of this review. Instead, the template within the guideline has been used as a best practice structure example (Table 1) and compared against Council’s draft Strategy. Table 2 summarises the structure of the draft Strategy alongside 3 other council local housing strategies.

Table 1 Local housing strategy structure template (NSW Department of Planning, Housing and Infrastructure)

1. Introduction	2. The Evidence	3. The Priorities	4. Actions
1.1 Executive summary	2.1 Demographic Overview	3.1 LHS Objectives	4.1 Implementation and Delivery Plan
1.2 Planning policy and context	2.2 Housing Demand	3.2 Land Use Planning Approach	4.2 Planning Proposal (if applicable)
1.3 LGA snapshot	2.3 Housing Supply	3.3 Mechanisms to Deliver the Options	4.3 Monitoring and Reviews
1.4 Housing vision	2.4 Land Use Opportunities and Constraints	3.4 Evaluation of the Options	
	2.5 Analysis of the Evidence Base		
	2.6 Housing Supply Gaps		
	2.7 Identifying areas with development capacity		

Table 2 Local housing strategy structure comparison

Kiama draft Growth & Housing Strategy	Liverpool Local Housing Strategy	The Hills Housing Strategy	Randwick Housing Strategy
<ul style="list-style-type: none"> - Our vision - Leading growth for good - Council's role in leading growth - Our community snapshot - Our population - Our growth and housing needs - Housing supply - Growth considerations - Our priorities - Our growth and housing plan - Our existing town centres - Village centres - Council catalyst sites - Greenfield development - New opportunities - Action and Implementation Plan - Monitoring and review 	<ol style="list-style-type: none"> 1. Introduction 2. The Evidence 3. The Priorities 4. Delivery and Implementation Plan 	<ol style="list-style-type: none"> 1. Introduction 2. Strategic Context 3. Evidence 4. Planning Priorities 5. Implementation, Monitoring and Review 	<ol style="list-style-type: none"> 1. Introduction 2. The Evidence 3. The Priorities 4. Implementation

Findings

The draft Strategy is lacking an overarching structure

As is evident in Table 2, Council's draft strategy is lacking a simple overarching structure. The local housing strategies for Liverpool, The Hills and Randwick councils have a simple organising structure which leverages the template developed by DPHI. This results in a clear and organised structure that enables the reader to clearly understand the narrative, the evidence, and why particular action is being taken.

Council's draft Strategy would benefit from inclusion of a higher order structure utilising the 4 overarching sections as consistent with DPHI's guideline.

Following the structure identified in DPHI's local housing strategy guideline would benefit Council's draft strategy by:

- Improving readability
- Increasing clarity of key messages and why particular action is being taken drawing a clear line of sight from the challenge, the evidence and the action
- Enabling a reduction in duplication that currently exists.

The draft strategy is too long

In its current form, at 82 pages excluding appendices, Council's draft Strategy is more than 40% longer (24 pages) than the housing strategy for Randwick and The Hills, and about the same length as Liverpool's. The strategies for The Hills and Randwick have both included more detailed context and demographics in an appendix rather than the body of document.

The 5-year housing target for Randwick is 4,000, The Hills is 23,300 and Liverpool is 16,700 compared to 900 for Kiama.

While not all local government areas are the same, with each having its own unique challenges and opportunities, a shorter strategy enables greater clarity and understanding from the reader and enables council to emphasis its key points more effectively.

A long strategy, combined with the lack of a clear document structure has resulted in the quality content from the draft Strategy (for example 'Our Priorities' and 'Growth Considerations') not being as prominent as it should be.

The draft Strategy lacks a cohesive narrative

An important part of developing a successful strategy is the need for the research to be presented in a way that is understandable, clear and portrays a strong story.

As a plan needs to capture the attention and imagination of the community and decision-makers, it needs to be a call to arms.¹

The impact of the draft Strategy lacking an overarching structure and being too long is that it lacks a cohesive narrative. The draft Strategy has some good discussions, for example, the section on growth considerations is strong and is supported by evidence but is out of place in the structure of the report and duplicates a lot of what is summarised in the section '8 growth and housing needs'.

The impact of a poor narrative is that the community and decision makers are not able to walk away with a clear understanding of the key outcomes the strategy is trying to achieve. This is an important component to the successful implementation of a strategic plan.

The draft Strategy is trying to be more than a local housing strategy

The draft Strategy is trying to be a wholistic growth strategy but in practice only deals with housing issues. Page 8 of the draft Strategy clearly states that *'this local housing strategy will support the delivery of new homes in the right locations and identifies ways of delivering the right amount and types of housing supported by infrastructure'*.

Despite this clear statement, one of the 8 growth and housing needs identified by the draft Strategy is 'housing that generates employment'. The idea that one of the LGA's growth and housing needs is to build more housing so that it can generate more employment is not backed up with any evidence in the draft Strategy.

Instead, it seems likely that the core need is that there is not enough housing supply to accommodate the current market, including key worker housing. If council are seeking to encourage more job creation through a new employment lands strategy, this will have flow on impacts by increasing the demand (even more) on housing supply.

Whilst it is agreed that the challenges and opportunities associated with employment land cannot be considered in isolation, as it is currently drafted, the

¹ Dalheim, H. (2023). Planning Better Cities. Palgrave Macmillan, Cham.

draft Strategy doesn't adequately consider employment lands, innovation, the changing nature of retail and manufacturing and regional opportunities in regard to job creation. Given the visitor economy is the area's dominate economic development activity, housing implications of this sector should be a focus for the draft Strategy rather than a wholistic focus employment.

The draft Strategy identifies that a future Employment Lands Strategy will be developed. Council should consider revising the draft Strategy to clearly be a local housing strategy, as identified on page 8, and leaving the more detailed employment considerations for the future Employment Lands Strategy.

A more relevant place to consider wholistic growth challenges and opportunities is part of the next update to Council's Local Strategic Planning Statement.

The draft Strategy's evidence lacks credibility

Due to a lack of referencing of statistics throughout the document, the draft Strategy is at risk of criticism. The use of referencing will give the strategy greater credibility and better support the positions and actions put forward.

Furthermore, the draft Strategy makes statements that would be better supported with evidence. For example, page 20 states that *'our young people leave the area in part due to a lack of housing choice. Being a tourist destination, we have lots of short-term rental housing'*. The use of the term 'lots' here does not convey any message about what is meant by lots – in comparison to what?

Recommendations

The following actions are recommended following review of the structure of Council's draft Strategy:

7. Focus the strategy as a local housing strategy rather than a wholistic growth strategy.
8. Reduce the overall length of the strategy by focussing on housing issues, reducing duplication, and considering moving excessive contextual information into appendices.
9. Include a complete set of references in the strategy to support evidence base.

4. Capacity analysis review

A review of the draft Strategy was undertaken with a focus on the evidence to support the draft Strategy's identified capacity (theoretical and feasible). This was done to ensure it is presented and analysed in a robust manner and to give Council confidence in its use as an evidence base.

This task has not involved any new analysis. Instead, it has been a review of the analysis already completed by Council.

Findings

The draft Strategy does a poor job of articulating the evidence supporting Council's housing supply

A quality local housing strategy should clearly articulate the evidence base that supports the priorities and actions of council. This is a position made clear in DPHI's Local Housing Strategy Guideline.

A critical part of the evidence base of a local housing strategy relates to housing demand and supply. A local housing strategy should seek to articulate the factors affecting housing demand, and the overall housing demand (including housing targets), the current supply of housing, and the resulting housing supply gap. This enables the reader to understand why future housing opportunities are required.

While Council's draft Strategy includes robust evidence to articulate housing demand factors (including demographics, household composition, housing costs, rental housing), it does a poor job of articulating the current housing supply situation.

Page 21 of the draft Strategy indicates that Council has developed a housing monitor. No evidence publicly of this monitor can be found.

The *Kiama Housing Supply Feasibility Analysis* (AEC, March 2022) is listed as the first discussion area in the housing supply chapter. Despite this, it is not clear what use this analysis has played in understanding theoretical or feasible capacity. The analysis has not been made publicly available.

Pages 25-26 of the draft Strategy deals with housing supply. In these pages, the only evidence presented includes the following dot points:

Our LGA (including all of the proposed greenfield release areas) has the capacity to accommodate an additional 4,985 dwellings. Some key observations include:

- *the potential additional dwelling capacity across the LGA is assessed to be 9,002 lots/ dwellings (or 5,891 excluding the release areas) based on existing planning controls*
- *the dual occupancy typology can potentially deliver the greatest number of additional dwellings at 3,455, followed by residential flat buildings at 1,583 dwellings*
- *subdivision potential, including already identified release area lands, can potentially deliver an additional 3,144 housing lots, and*
- *additional capacity for townhouses and integrated housing is limited with only a total potential for a combined further 188 dwellings.*

The presentation and articulation of the data presented in these dot points could be improved with the use of graphs and tables. It should also go into more detail to articulate the spatial distribution (infill, centres, greenfield), temporal expectations (5-year, 20 year) and housing type (separate dwelling, dual occupancy, apartment) of supply.

It is also not clear how the 4,985 dwellings identified as LGA wide capacity relates to the 9,002 lots/dwellings identified as '*potential additional dwelling capacity across the LGA*'.

Further in the draft Strategy, there is discussion about capacity within centres and greenfield areas. An improved housing supply narrative upfront would also enable the scattering of figures throughout the later sections to be more meaningful in understanding their role in the overall housing supply narrative.

The local housing strategy developed by The Hills Council clearly articulates council's ability to meet long term dwelling demand on a temporal and spatial basis.

The draft Strategy lacks clear evidence to support its claims that the LGA can meet the 5-year housing target

An important element of the development of local housing strategies is the need to show how council can meet the housing targets set by the NSW Government under the National Housing Accord. This requirement is made clear in the Ministerial Statement of Expectations and discussed in Chapter 2.

The draft Strategy (page 26) says that:

It is expected that targets will be met by existing approved dwellings and land release, ongoing infill development in existing residential zoned land such as dual occupancy, and other secondary dwellings.

This statement needs to be supported by data and evidence. The draft Strategy does not contain any information on development approvals data or temporal analysis of infill development such as dual occupancy. This is also no data to support the use of secondary dwellings.

The draft Strategy does not discuss the opportunities of secondary dwellings but relies on it as a source to meet 5-year housing targets. It should be noted that the capturing of data relating to secondary dwellings is known to be a challenge. Regardless, the draft Strategy would be improved if it included narrative to support the claim that secondary dwellings will play a role in meeting the 5-year housing targets.

It should also be noted that theoretical capacity is not a measure that should be used to justify the meeting of the 5-year target. The 5-year target, as identified on page 27 is based on the existing housing pipeline, as well as impacts of the recent housing reforms.

The draft Strategy does not clearly articulate how the LGA will respond to demand over the longer term (20+ years)

The draft Strategy (page 4) states that the local government area is expected grow by 31,000 people by 2044, with a projected 3,456 new dwellings required to meet demand. It states that:

This strategy focuses on the concepts of towards 31,000 population, planning for a range of growth scenarios and options to unlock potential growth in appropriate locations.

In the same way the draft Strategy lacks evidence to support its claims that the LGA can meet the 5-year housing target, it does not clearly articulate (through evidence or narrative) how the LGA will respond to housing demand in the long term. It also fails to identify a range of growth scenarios despite the statement indicating it has.

The draft Strategy references REMPLAN for population projections but fails to also reference the projections from the NSW Government. This is important since they are based on the common planning assumptions for NSW and have been used to inform the housing targets.

The draft Strategy (page 50) states that:

As part of this Strategy a Strategic Housing Framework has been developed to provide the community, stakeholders and industry with direction on how change and growth will occur and areas which will not be considered for growth at all

Given the capitalisation of 'Strategic Housing Framework', it reads as though there should be a section in the draft Strategy that articulates this 'Framework'. No such framework can be sourced in the draft Strategy.

The draft Strategy (page 49) also states that council has adopted:

a pipeline of supply approach to the decisions and directions outlined within this Strategy. This is based on planning principles and acknowledges all that data obtained that indicates that new greenfield sites are not required at this time to meet projected need or supply.

The 'planning principles' referenced here are not able to be sourced in the draft Strategy. In addition, the last sentence indicates that Council is able to meet the 20-year dwelling demand of 3,500 additional dwellings, despite there being no evidence to support this claim.

Despite the statements on page 49, the following page in the draft Strategy (page 50) makes contradicting statements by saying that *'there are lands that have not been included within the Strategy at this time. A further discussion and consideration of these lands and the lands surrounding these locations needs to occur to support ongoing planning for a 20-year horizon'*.

The chapter 'Our growth and housing plan' in the draft Strategy lacks any form of evidence, provides no growth options, and falls well short of being a 'plan'. If Council are unable or unwilling to identify sufficient land for long term growth, it should consider including principles/criteria to guide the assessment of likely future adhoc proposals.

Capacity within centres

The draft Strategy does not provide an overall figure of housing capacity within centres. Capacity figures have been included for some centre, but not across all housing types. A summary can be found in Table 3.

The draft Strategy does, however, provide a strong narrative around the current land use controls, and some challenges and opportunities to facilitate greater housing supply. Council should consider including the 'Council catalyst sites' as a subheading in the Kiama Town Centre discussion.

Table 3 Summary of findings on each centre

Centre	Summary
Kiama	<ul style="list-style-type: none"> - No housing supply capacity has been identified - Includes some discussion on feasibility challenges (parking requirements, excavation costs) - Limited discussion on opportunities
Gerringong	<ul style="list-style-type: none"> - Includes data on capacity for each housing type, however, it is not clear if this is theoretical or feasible capacity or if this capacity is expected to be taken up in the next 20 years - Includes some discussion on constraints (flooding, slope) - Identifies that there are opportunities for additional supply. Would be good to see more discussion in relation to these points.
Jamberoo	<ul style="list-style-type: none"> - Includes the most data on capacity out of any of the centre. - Capacity is provided for each housing type, however, it is not clear if this is theoretical or feasible capacity or if this capacity is expected to be taken up in the next 20 years - Includes some discussion on infrastructure challenges and constraints (sewerage infrastructure, flooding) - Notes that the centre is only expected to have minimal growth and that revitalisation of the village would be improve vibrancy.
Kiama Heights/Easts Beach	<ul style="list-style-type: none"> - No housing supply capacity has been identified - Includes some discussion on opportunity to explore future use of the caravan park.
Gerroa	<ul style="list-style-type: none"> - Identifies capacity for dual occupancy. Unclear if this theoretical or feasible capacity or if this capacity is expected to be taken up in the next 20 years
Minnamurra	<ul style="list-style-type: none"> - Identifies capacity for dual occupancy. Unclear if this theoretical or feasible capacity or if this capacity is expected to be taken up in the next 20 years - Notes that the centre is constrained due to environmental and transport impacts
Kiama Downs	<ul style="list-style-type: none"> - No housing supply capacity has been identified for different housing types. Only capacity identified is 2 larger R2 zoned sites. - Includes some discussion on constraints (riparian corridors) - Identifies that a criteria to assess dwelling capacity can be found in Table 6.4, however, the report does not contain a table 6.4

The draft Strategy lacks transparency regarding the EOI process and criteria

As noted previously, Council's draft Strategy (page 49) indicates that Council is able to meet the 20-year dwelling demand of 3,500 additional dwellings, despite there being no clear evidence to support this claim.

If there is sufficient supply to meet demand over the long term, a question must be asked as to why there is even a need for an EOI process. The draft Strategy doesn't articulate that there is a gap in supply/demand which would warrant the need for more sites over the 20-year timeframe.

Furthermore, the lack of a clear process and criteria for lands submitted for consideration under the EOI process results in a significant lack of transparency.

Recommendations

The following actions are recommended following review of Council's draft Strategy's capacity analysis:

10. Improve the presentation and articulation of housing capacity with the use of more graphs and tables.
11. Provide more detail to articulate housing supply include the spatial distribution, temporal expectations (5-year, 20-year) and housing typ (infill, centres, greenfield).
12. Clearly articulate (using evidence and by addressing inconsistencies in narrative) how Council is able to meet the 5-year housing targets and 20-year dwelling demand.
13. Consider the inclusion of principles/criteria to guide the assessment of any future adhoc proposals.
14. Clarify if the AEC report is being used as the reference for all data or not and reference appropriately.
15. Improve centre narratives by including more data (particularly for Kiama town centre), being clear around feasibility challenges, and providing more detailed discussion in relation to opportunities (e.g. expand the dot points included in the discussion on Gerringong town centre; and including the Council catalyst sites in the Kiama Town Centre discussion).
16. Include the criteria used to determine/assess the EOI's in the strategy to improve transparency.

5. Actions & implementation plan review

Successful implementation of strategic plans requires good governance, strong collaboration and effective monitoring, evaluation, and reporting. Specifically, this should include:

- Clear actions with timeframes for delivery
- A line of sight between any regional and district plans to council LSPS and local strategic planning
- Coordination across three levels of government
- Strong governance to shape infrastructure and services funding, prioritisation and provision
- An evaluation and monitoring framework
- Reviews at least every 5 years.

A review of the action and implementation plan from Council's draft Strategy has been undertaken with consideration of the dot points listed above.

The draft Strategy identifies 39 actions across three themes (advocacy, planner and regulator, and collaborate and monitor). Key findings regarding the actions include:

- 24 actions (60%) are related to planning and regulation
- 17 actions are identified with a timeframe of ongoing
- 22 actions are identified to be completed between now and end of 2025/26

Figure 1 Number of actions by type included in Council's draft Strategy

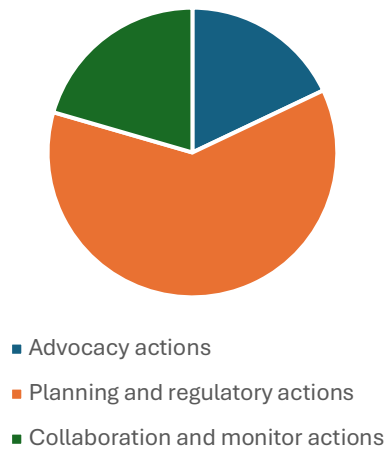
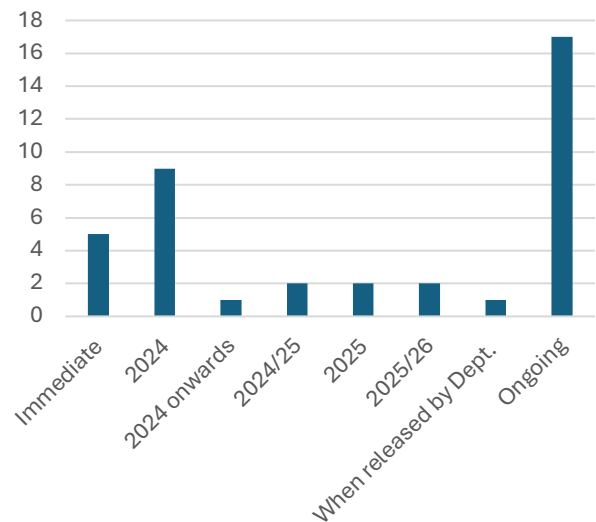


Figure 2 Timeframe of actions included in Council's draft Strategy



Findings

Actions in the draft Strategy lack clarity, are duplicative, and are difficult to measure success

The Illawarra Shoalhaven Regional Plan identifies actions, strategies and collaboration activities. It clearly notes that actions are initiatives that are led by DPHI and will be delivered and finalised before the next 5-year review. It does this to clearly identify those actions that will have a start and end date, to differentiate them from other activities (while still important) that are deemed business as usual or policy statements – defined as strategies. The Shoalhaven LSPS takes a similar approach and has clear and well understood actions.

The actions in Council's draft Strategy:

- Lack clarity: Many of the actions are poorly worded (for example action 1.7, 2.19), introduce terms and concepts not previously discussed (for example action 1.1. 2.1) or have no associated narrative to justify its inclusion in the strategy (for example action 1.5, 2.6, 2.17, 2.19).
- Are duplicative: Some of the actions in table 7 and table 9 are duplicated word for word. There are also actions that have been duplicated from Council's LSPS. Some of the actions could be combined to reduce duplication (for example, actions 2.1 and 2.2 could be combined with the ones that follow)
- Are difficult to measure success: to enable successful monitoring and evaluation, actions should be able to be measured. How would Council measure the success of implementing action 1.6 for example?

Actions should also seek to start with a verb. Many actions in the draft Strategy do this well but it is not consistent.

The wording and detail that is included in actions 2.3 and 2.4 is good. It is not duplicative, success can easily be measured, and while improvements can be made to include a verb to start the action, and cross referencing needs to occur to make sure the narrative to support these are in clear and in the body of the strategy, it should be viewed as a good example.

The draft strategy does not include adequate actions to respond to the challenges

Where an issue is raised in the strategy, Council should indicate how action is going to be taken to address and overcome this issue. The draft strategy doesn't currently do this well.

For example, it would be expected that the 'eight growth and housing needs' could be linked to an action, creating a clear line of sight between evidence, narrative and delivery.

The second point in the eight needs is the need for 'more affordable housing options for our young people and key workers'. Page 37 of the draft Strategy also identifies an opportunity to 'develop actions and strategies that support the provision of social housing'. Despite this, the only action relating to this need is action 2.22 which simply notes that Council will develop a policy for affordable housing contributions. This falls well short of what is required to address this need.

The timeframes allocated to the actions are complex and don't span the time until the next 5-year review

The timeframes allocated to the actions lack structure, with 8 different categories. Most of the actions (22) are identified to be completed between now and end of 2025/26.

For a strategy that is considering 20-year growth and identifies the need for a 5-year review, it seems lacking that it would only identify actions for work over the next 2 years.

In addition, the categorisation of the timeframes is confusing. It is difficult to understand what the difference between an immediate timeframe and a 2024 timeframe is, or the difference between an ongoing timeframe and 2024 onwards. The use of both calendar years and financial years also creates confusion.

The draft Strategy lacks clarity on what it is monitoring

The draft Strategy's section on monitoring and review indicates that annual reviews of housing delivery and supply will happen, as well as 5 yearly reviews of the evidence base and the strategy itself. What it lacks however, is any detail on monitoring.

Monitoring data covers a range of sectors, including population demographics, infrastructure development, housing trends, digital and freight connectivity, employment statistics and environmental impacts, amongst others.

Monitoring the amount, type and distribution of housing across the LGA is an important part of delivering housing strategies and establishing a transparent way to measure housing targets. This will require data collection on various dwelling types, their water connections sourced from local authorities, occupancy rates and different housing models and the Illawarra Shoalhaven Urban Development Program will play a strong role in bringing this data together.

The draft Strategy also lacks any guidance on how Council will report on progress and implementation of the strategy, including how this will be communicated publicly.

Recommendations

The following actions are recommended following review of the actions and implementation plan from Council's draft Strategy:

17. Introduce a structure to the actions that creates clarity on which actions are business as usual and which are delivery-based actions that have a start and end to them. Ensure that actions start with a verb, and that the challenges raised in the strategy have a corresponding action.
18. Remove actions that duplicated, consider combining and/or rewording.
19. Develop actions where success can be measured.
20. Introduce a clear timeframe structure to the actions e.g. short, medium, long term.
21. Consider the need for actions that span the life of the strategy, or at least until the next review.
22. Improve clarity and understanding of how Council will monitor progress of the strategy with an emphasis on data availability. This should consider potential performance indicators for the strategy.
23. Consider opportunities to publicly report on progress towards the objectives of the strategy and delivery of actions.


Appendix A

Selected strategies from the Illawarra Shoalhaven Regional Plan and associated narrative relevant from the draft Kiama Growth and Housing Strategy.

Regional Plan Strategies	Draft Strategy relevant narrative
Strategy 5.1: Create an environment for a diverse visitor economy.	The draft Strategy considers the vibrancy and amenity of spaces, including town centres and recognises their role in supporting vibrant places for residents and visitors.
Strategy 7.1: Respond to the changing nature of retail.	The draft Strategy recognises the need to consider and respond to the changing nature of retail in existing centres
Strategy 8.4: Provide opportunities for the region's LALCs to interact with and utilise the NSW planning system and the planning pathways available to achieve development aspirations.	The draft Strategy does not identify any opportunities to collaborate with LALCs or other Aboriginal Stakeholders in regards to opportunities for specific housing outcomes.
Strategy 9.2: Enable new rural residential development only where it has been identified in a local strategic plan, prepared by council and endorsed by the Department of Planning, Industry and Environment.	The draft Strategy does not propose any new rural residential development
Strategy 11.1: Protect, maintain or restore important environmental assets.	The draft Strategy recognises the need to protect, maintain and restore environmental assets
Strategy 11.2: Protect and enhance the function and resilience of biodiversity corridors in strategic planning and local environmental plans.	The draft Strategy recognises the need to protect and enhance biodiversity corridors
Strategy 11.4: Protect biodiversity values in urban release areas.	The draft Strategy does not identify any strategic biodiversity opportunities or incorporate validated and up-to-date environmental data
Strategy 11.5: Protect coastal lakes and estuaries by implementing the NSW Government's Risk-Based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions, with sensitive coastal lakes and estuaries prioritised. Strategic planning and local plans should support improved water quality and ecological function.	The draft Strategy recognises the need to protect the sensitive coastal estuaries in the LGA – Spring Creek and Werri Lagoon

Strategy 11.6: Align local plans with any certified Coastal Zone Management Plan or certified Coastal Management Program.	The draft Strategy mentions the need to implement the Kiama Coastal Management Plan
Strategy 12.2: Reduce exposure to bushfire and natural hazards	The draft Strategy recognises the need to reduce exposure to bushfire and natural hazards
Strategy 12.3: Reduce the region's exposure to natural coastal hazards through implementing the NSW Government's Coastal Management Framework.	The draft Strategy recognises the need to reduce exposure to natural coastal hazards
Strategy 13.1: Foster opportunities to increase urban tree canopy coverage in urban areas.	The draft Strategy considers opportunities to increase urban tree canopy cover, see Place Principles for South Kiama as an example.
Strategy 14.1: Enhance and increase access to public spaces.	The draft Strategy considers opportunities for enhanced and increased access to public spaces
Strategy 15.1: Strategic planning and local plans should consider opportunities to encourage initiatives that reduce emissions.	The draft Strategy does not directly propose emissions reduction opportunities but it does recognise the role that well planned and designed communities can play in reducing emissions, including the need for improved public transport options
Strategy 15.2: Strategic planning and local plans should consider opportunities to encourage energy efficient building design for residential, commercial and industrial areas.	The draft Strategy identifies that with increased growth and development there is a corresponding community expectation to increase the standards of design and amenity, open space, communal space and responsiveness to local character. Sustainable design and opportunities for innovative options needs to be forefront in the decision process.
Strategy 17.1: Encourage the sustainable use of water resources.	The draft Strategy recognises the need to encourage sustainable use of water resources.
Strategy 18.1: Identify urban growth boundaries and facilitate opportunities to support ongoing supply of housing in appropriate locations. Strategy 18.2: Facilitate housing opportunities in existing urban areas, particularly within strategic centres.	The draft Strategy identifies opportunities to support housing supply across the LGA, including in existing urban areas and new release areas.
Strategy 18.3: Identify, prioritise, and coordinate infrastructure needed to support vibrant and healthy communities in the region's urban release areas through the Illawarra Shoalhaven Urban Development Program. Strategy 18.4: Monitor land and housing supply through the Illawarra Shoalhaven Urban Development Program.	The draft Strategy recognises the role of the Urban Development Program and for Council to continue to collaborate with the NSW Government.
Strategy 19.1: Continue to provide for and encourage a range of housing choices.	The draft Strategy recognises the need to provide for and encourage a range of housing choices.

<p>Strategy 21.1: Consider the changing needs of local neighbourhood centres.</p>	<p>The draft Strategy recognises the need to plan for the changing needs of local neighbourhoods.</p>
<p>Strategy 23.1: Identify, conserve and enhance cultural heritage values.</p>	<p>The draft Strategy identifies a number of places that contain significant cultural heritage values that require protection and retention. It also identifies the need to consider cultural heritage values in the place principles for South Kiama.</p>



This document has been prepared by Miller Street Consulting on behalf of Kiama Municipal Council. Information contained in the report is based on analysis and research undertaken by Miller Street Consulting.