

19 July 2016

Ashley Albury  
Director Regions  
Western  
NSW Department of Planning & Environment  
PO Box 58  
Dubbo NSW 2830

Dear Sir/Madam

### **Exhibition – Draft Riverina-Murray Regional Plan**

I am writing in response to your invitation to review and comment on the recent release of the *Draft Riverina-Murray Regional Plan* (draft Plan).

AlburyCity has been a strong advocate for a regional growth plan that promotes and supports economic development capacity building and regional growth. We seek a plan that identifies key strategies and actions for the Government to work with local and regional groups of Councils. This includes identifying, planning, enabling, funding critical infrastructure, underscored by a 'whole of government' approach.

In light of this, AlburyCity generally supports the draft Plan. However we strongly believe that the critical elements outlined above need to be strengthened and supported by a more definitive State Government commitment to the future of the Riverina Murray Region.

AlburyCity appreciates the opportunity to provide input to the plan. This submission has been prepared with regard to the draft Plan structure and layout and the following comments are offered for your consideration and discussion.

#### **1. General Comment**

The forecast population and growth figures are conservative and underestimate demand and actual growth currently and recently occurring in the region, particularly in Albury.

The Albury Land Monitor confirms that over the last 10 years the Albury LGA has produced on average 314 houses and 221 new residential lots. More recently, over the last 5 years the Albury LGA has produced on average 379 houses and 248 new residential lots. This shows a 51%

increase in the number of total housing approvals and a 28% increase in the number of vacant lots produced in the last 5 years compared to the previous 5 years. Those figures, particularly the last 5 years, are comparable to the projected population and housing growth cited within the draft Plan (independent of all other LGAs in the Riverina-Murray region).

AlburyCity requests that the Department undertake a further review of both population and housing projections especially given actual development on the ground in recent years prior to finalising the draft Plan.

Infrastructure is critical to the growth and development of any region. It is acknowledged that as an overarching strategic planning document there is an obvious lack of detail, direction and commitment regarding infrastructure provision in the Plan. However, it is anticipated that scope exists for each Council and/or joint or regional organisations of Councils to investigate and develop detailed planning documents that identify, cost and prioritise infrastructure commitments.

Whilst it is stated that the final Plan will inform ongoing planning and delivery of infrastructure, there is an obvious gap and lack of detail on how this will occur. In recognition of above comments, it is suggested that the final Plan (as overarching strategic planning policy) incorporate section(s) that document relevant processes available to facilitate and enable both investigation and development of detailed planning document that will assist necessary infrastructure provision.

In lieu of infrastructure gaps and priorities, AlburyCity requests that further detail be provided in the final Plan that confirms the role of the final Plan in enabling those processes involved in infrastructure identification and delivery across the region on a local scale.

## **2. Goal 1 (Economy) – A growing economy supported by productive agriculture and sustainable use of natural resources (Pages 17-33)**

### **Action 1.2.2 Establish a strategic planning framework that protects the productive values of agricultural land and manages land use conflict (Pages 21-22)**

AlburyCity notes that amongst draft Plan strategic planning framework provisions proposed, it is intended where possible to increase opportunities for agricultural and horticultural uses to keep fresh foods available locally and require local planning strategies to reflect these outcomes. Further detail on the provisions proposed to support and implement such policies is requested prior to adoption.

**Action 1.2.3 Encourage the increased use of biosecurity measures to protect the region's agricultural assets (Page 22)**

AlburyCity requests greater detail be provided regarding biosecurity plans and the potential impost or restrictions required to support such an approach.

AlburyCity recognises the value and importance of agricultural industries to the region but is seeking further detail on proposed measures particularly where it is stated that government 'will require Councils' to undertake actions.

**Action 1.3.1 Support the sustainable use and conservation of water resources (Pages 22-26)**

AlburyCity supports the sustainable use and conservation of water resources across the region. Recognition of the value and importance of water as a resource to the regional economy and environment is critical across the Riverina-Murray region.

The Albury LGA supports significant value-add industries, including high-volume water users (especially in the manufacturing sector). Consequently, it is suggested that the draft Plan identify the Albury LGA as a node for high-volume water users. It is anticipated that such a designation would recognise the ergonomics associated with being located close to a major water resource (including the Murray River and Lake Hume) and synergies associated with the availability/access to supply chain services and infrastructure.

**Action 1.3.2 Protect areas of mineral and energy, extractive and renewable energy potential (Pages 26-28)**

The draft Plan states that mineral and extractive industries and associated infrastructure such as freight routes and energy transmission networks are important to the region and should be protected from adverse development that could affect current or future extraction.

AlburyCity is confident that adequate procedures already exist to manage and maintain accurate records in relation to existing mineral and extractive industry operations to inform appropriate settlement and development activities in the interests of avoiding land use conflict.

AlburyCity defers to State-wide Mineral Resource Audit information that identifies mineral resource and/or extractive industry sites for the purposes of maintaining adequate buffers between these sites and sensitive land uses. This information has been incorporated into the AlburyCity Geographic/Land Information Systems to inform future planning decisions.

Whilst significant investment in renewable energy generation has not been undertaken in the Albury LGA, it is noted that the draft Plan refers to areas west of Griffith and Albury that generally have a slope of less than 1 per cent that are ideal for developing large-scale solar power generation. AlburyCity supports renewable energy opportunities.

**Action 1.3.3 Avoid urban expansion and rural residential development on productive agricultural land and identified mineral and energy resources Page 29-32)**

Similar to that response provided to Action 1.3.2, AlburyCity is confident that adequate procedures already exist to manage and maintain accurate records in relation to existing mineral and extractive industry operations to inform appropriate settlement/development activities.

AlburyCity acknowledge that adhoc settlement decisions in the rural landscape can have potential adverse impacts on existing primary production and resource pursuits, and accordingly, have undertaken necessary strategic planning investigations to aid and assist appropriate development outcomes. We continue to support and promote strategic land use planning that protects productive agricultural land.

**3. Goal 2 (Transport & Infrastructure) – Improve regional transport networks and utility infrastructure to support economic activity (Pages 35-47)**

- Action 2.1.1 Identify and prioritise pinch points in the freight network (Pages 37-40); and**
- Action 2.1.2 Identify and protect intermodal freight terminals to facilitate growth in the freight and logistics sector (Page 41)**
- Action 2.3.1 Coordinate the delivery of infrastructure to support the future needs of residents, business and industry – noting the requirement for the timely delivery of infrastructure across the regions industrial areas, specifically Nexus Industrial Precinct identified as a regionally significant land release. (Pages 46-47)**

NSW Government support for the establishment of intermodal freight terminals by way of provision of appropriate road and rail access is fully supported. However their success is reliant on the effective coordination of Federal, State and Local Government contributions to additional and ongoing investment on infrastructure for both rail and road.

The Nexus Industrial Precinct and Ettamogah Rail Hub will be critical elements in the long term growth and development of the broader regional industry and logistics networks. Their success is dependent on suitable and appropriate infrastructure which can only be delivered with coordinated funding mechanisms including commitment from State Government. The Davey Road interchange

southern ramps are significant components for these assets and will directly benefit and enhance the opportunities created.

The performance of the Nexus Industrial Precinct and Ettamogah Rail Hub Precinct will provide very significant economic uplift to the region and will directly benefit surrounding agribusiness across the region by improving connections to port facilities.

AlburyCity requests that the referenced Hume Highway/Davey Road full interchange be included in the notations in Figure 11: Potential Freight Network Improvements.

AlburyCity also refers to the recommendations in the RAMROC Regional Freight Transport Plan (March 2016). This project was initiated by RAMROC to investigate the freight infrastructure network from a regional perspective. The implementation of integrated transport solutions for the region was an overriding goal of this project and to that end RAMROC has reviewed both the rail, road and air transport networks. This information has been separately provided to the Department for reference and inclusion in infrastructure plans.

Inconsistencies identified between the draft Plan transport and infrastructure commitments and that recommended by the RAMROC Regional Freight Transport Plan (March 2016) highlights the need for State prepared strategic planning document(s) to integrate with those prepared by Councils and/or joint regional organisations of Councils to ensure a congruence in objectives, priorities and outcomes.

Accordingly, AlburyCity requests that strategic policy documents, both regional (prepared by the State) and sub-regional (prepared by Councils and/or joint regional organisations of Councils) be prepared collaboratively and that a framework be established to clearly outline document hierarchy.

**Action 2.1.3 Identify and prioritise opportunities to improve regionally significant local road connections (Page 42)**

The draft Plan states that the NSW Government will work with councils to:

- identify, coordinate and prioritise the delivery of local road projects that help support the regional freight network.

AlburyCity considers such work to be of critical importance to the function and overall performance of both agribusiness, logistics and manufacturing sectors in the Riverina-Murray region, especially in relation to providing greater access to national and global markets.

It is recommended that nominated local projects be prioritised, undertaken in the short-term and that appropriate funding be allocated to assist implementation.

**Action 2.2.1 Implement local planning controls that protect regional airports from the encroachment of incompatible land uses (Page 43)**

AlburyCity commends the draft Plan and commitment by the NSW Government to support the protection of the 20 per cent of flight slots allocated to regional NSW services as well as greater allocation in peak periods. These flight slots determine the convenience of air travel for regional communities accessing Sydney by air and are critical to supporting business in the region.

The draft Plan states the NSW Government will require that councils:

- implement controls in local environmental plans to protect airports from the encroachment of incompatible development.

AlburyCity's land use planning controls have been designed to protect airport operations into the future (this includes complimentary surrounding land use zones, noise contour provisions and obstacle limitation surface plans). AlburyCity supports further investigations that offer protection to regional airport operations recognising their significance as a supply chain resource and providing long term solutions to avoid land use conflict.

**Action 2.3.2 Establish monitoring mechanisms to enable better demand forecasting to inform infrastructure coordination (Page 47)**

The draft Plan promotes (through the NSW Government) the establishment of monitoring mechanisms to better coordinate the development of land releases and inform infrastructure provision.

AlburyCity has been developing and maintaining the Albury Land Monitor to track land development and consumption on commercial, industrial and residential land across the Albury LGA. This provides an accurate, relevant and easy to use mechanism to monitor and report on land supply and demand across the City.

The Albury Land Monitor would provide a relevant and suitable mechanism to assist with infrastructure planning. This would be reliant on an open and transparent process to be established with active and committed participation from all infrastructure providers. There has been a notable lack of interest and support from State Agencies regarding medium to long term infrastructure planning and provision in local growth areas. Any process that encourages and facilitates a 'whole of government approach' and participation is supported. AlburyCity would be willing to participate in development of any future mechanisms and frameworks.

#### **4. Goal 3 (Settlements) – Strong regional cities supported by a network of liveable towns and villages that meet the community’s changing needs (Pages 49-67)**

##### **Action 3.1.1 Develop a regional cities strategy for Albury, Wagga Wagga and Griffith (Pages 50-54)**

AlburyCity applauds the recognition and focus on the regional cities of Albury, Wagga Wagga and Griffith. The regional cities are intrinsic in the ongoing development and sustainability of their surrounding regional areas.

In support of this, AlburyCity recommends a review of the prioritisation of the objectives for a regional cities strategy to more appropriately reflect importance as follows:

1. Coordinates infrastructure delivery across residential, industrial and rural land;
2. Assigns responsibility for actions and projects across all levels of government;
3. Manages areas of growth;
4. Investigates linkages between health and education precincts; and
5. Considers the role, function and relationship of the regional cities with other centres.

The existing AlburyCity policies including the TWPSP and RLSTT&SC coordinate long term settlement growth and infrastructure provision in the Thurgoona/Wirringa Urban Release Area (URA) and existing LGA.

AlburyCity in partnership with RMS is also in the process of undertaking city-wide traffic modelling of Albury and its surrounds (Albury Transport Model). This project will assist both AlburyCity and RMS in understanding and assessing the impact of future growth and network changes on the transport network (particularly interchanges).

It is further noted that the draft Plan states that the NSW Government will work with:

- Wagga Wagga City Council to establish a health precinct around the Wagga Wagga Rural Referral Hospital.

AlburyCity request the inclusion of the Albury Base Hospital and surrounding land amongst those investigations to be undertaken to encourage and guide the consolidation of a health precinct in the Albury LGA. It is noted that the draft Plan already references Government funding (that seeks to expand health infrastructure capacity in the regional cities) including the Australian Government commitment of \$65 million toward the Albury Wodonga Regional Cancer Centre.

AlburyCity recognises that the co-location of both the Albury Base Hospital and Albury Wodonga Regional Cancer Centre creates synergies that will maximise opportunities for complementary

activities and health related services. It is requested that Albury City Council also be identified amongst NSW Government investigations and strategic planning work to aid, assist and manage the establishment of a consolidated health precinct in and around the Albury Base Hospital complimentary to that identified for Wagga Wagga.

The draft Plan contains a map of Albury featuring key land use activities across the Albury urban area. It is requested that Figure 12: Albury (page 51) be revised to reflect minor corrections to land use allocations shown as per annotations enclosed.

**Action 3.1.2 Implement an industrial land monitoring program to maintain a supply of well-located and serviced industrial land (Pages 54-55)**

In relation to the monitoring of supply and demand for industrial land, AlburyCity authors and maintains the Albury Land Monitor that tracks land development and consumption on commercial, industrial and residential land across the Albury LGA.

AlburyCity would be a willing participant in any discussions that seek to provide a framework upon which industrial land development and infrastructure provision and timing can be based (particularly in relation to the role of NSW Government Agencies in the planning and provision of necessary infrastructure).

The Draft Plan contains a Table (page 55) that lists industrial land supply across the regional cities of Albury, Griffith and Wagga Wagga. It is recommended that Table 1: Regional Cities – Industrial Land Supply be revised to include Airside North Industrial Estate (70 hectares of vacant land) and East Albury Industrial Estate (23 hectares of vacant land).

**Action 3.1.3 Develop and deliver strategies that strengthen the commercial function of CBDs and town centres (Pages 55-56)**

AlburyCity policy including the Albury & Lavington CBD Masterplans (2009) and the TWPSP (2013) already provide a long term planning framework for the retail centres across the Albury LGA. These policies aim to protect and recognise existing commercial and retail hierarchies. At the same time they are designed to facilitate retail opportunities across the City and growth areas as relevant and warranted.

AlburyCity is happy to support and promote long term strategies that reinforce the commercial and retail hierarchies critical to the success and sustainability of these sectors and the region in the future.

### **Action 3.2.2 Support the continued identification and protection of the region's heritage (Pages 57-58)**

Built and Cultural Heritage are integral elements of each City's identity and structure. AlburyCity supports the protection, enhancement and promotion of both built form and cultural heritage items.

Programs and long term planning strategies that support this approach need State Government direction and partnerships. This can include sponsorship, leadership, facilitation and funding. The State Government needs to commit resources and funding to enable these to occur.

Amongst AlburyCity work program projects, a city-wide heritage study has been scheduled to commence in the next 2 years. This project provides an opportunity to audit, update and protect (where warranted) items of Aboriginal and European culture heritage. Recent promotion of new heritage programs is supported but actual details on availability and access to these programs remains uncertain.

### **Action 3.2.4 Deliver regionally specific urban design guidelines (Page 59)**

AlburyCity supports urban design guidelines that are relevant and appropriate to regional areas but more importantly that they reflect and facilitate development outcomes that are complimentary to community expectations and values. It is important to note that a one size fits all approach is not appropriate for urban design especially across a broad region such as the Murray-Riverina.

AlburyCity has invested considerable time and effort into the preparation of commercial and residential strategies, masterplans and other policy documents that recognise and encourage a diversity of land use activities and built form in both the public and private domain.

Recognising that regions and City's are different, AlburyCity does not support mandatory state-wide regional urban design guidelines. AlburyCity suggests that any regional urban design guidelines be provided as a resource that councils can elect to consider and/or incorporate into their local Development Control Plan where appropriate following consultation and engagement with the local community.

### **Action 3.2.5 Identify opportunities to provide improved and increased transport connections between the region's towns and villages to the regional cities (Pages 59-60)**

AlburyCity supports investigations that seek to better connect communities in a regional context acknowledging that likely outcomes and success will be reliant on NSW Government funding and action. The costs of providing and operating successful regional transport are prohibitive to Local Government and State intervention is necessary.

**Action 3.4.1 Deliver enabling planning controls that facilitate an increased range of housing options including infill housing close to existing jobs and services (Page 61)**

The draft Plan states that the NSW Government will work with councils to:

- develop and implement a monitoring program for residential lands across the region to identify future strategic requirements and regional supply and demand;
- review planning controls in existing urban areas to identify opportunities to increase the range of housing options, including townhouses, villas and apartments, in regional cities and locations close to existing services and jobs;
- prepare Statewide land release criteria to assess locations for residential uses across regional NSW, for use as an input to settlement planning;
- align infrastructure planning with land release areas, to provide new developments with adequate infrastructure; and
- regularly review and update local strategic plans, where required, to provide a range of housing types that reflect the changing needs of the community.

AlburyCity authors and maintains the Albury Land Monitor that tracks land development and consumption on commercial, industrial and residential land across the Albury LGA.

AlburyCity has a regime of planning policies that facilitate a diverse range of housing development (including rural life-style housing, single detached dwellings, dual occupancy, multi-dwelling housing, integrated housing, residential flat buildings and mixed use developments incorporating residential). This is supported by locality based planning policies (including Albury Local Environmental Plan 2010, Albury Development Control Plan 2010 and area specific controls including TWPSP and RLSTT&SC) that have been prepared and implemented to facilitate diverse spatial land use designations across the Albury LGA, ascertain and assist planning for future infrastructure requirements.

Local market demand, and acceptance, is the greatest driver for supply, Council policies and plans despite best of intentions are limited in their capacity to deliver on outcomes.

Consideration is required on the role that the Regional Growth Plan and State Government Agencies can play in fostering and delivering some of these desired outcomes. Further consideration and discussion is required on these aspects.

AlburyCity also queries NSW Government involvement in dictating timelines associated with the regular review and update of local strategic plans pending changes in demand. AlburyCity would prefer that each of the regional cities retain some autonomy in determining both timelines and the

focus of any review of document content and subject matter in response to local conditions, development industry preferences and Council development aspirations.

**Action 3.4.2 Facilitate a more diverse range of housing for seniors (Pages 62-64)**

AlburyCity remains supportive of housing diversity. However, diversity should not come without consideration of the supporting infrastructure and services to support these growing demands. This is particularly relevant to the transport and health services in regional areas.

AlburyCity supports and offers to participate in any review(s) aimed at supporting the future demand and meeting the needs for seniors housing.

**Action 3.4.4 Develop and implement principles for rural residential development (Pages 64-65)**

AlburyCity has recently undertaken detailed investigation and strategy work regarding rural residential development in the Splitters Creek and Table Top areas. These areas are the key growth areas for rural residential development in the Albury LGA. The RLSTT&SC identifies and promotes principles for sustainable rural residential development. This level of strategic work is supported and encouraged across the wider region and will provide long term benefits regarding and managing land use conflicts and infrastructure provision.

AlburyCity supports the development of broad based principles but there must be recognition of regional and local issues, conditions, opportunities and limitations. As per previous comments 'one-size' does not fit all.

AlburyCity agrees with Principle 2 stating that new rural residential areas will be located in close proximity to existing urban settlements to maximise the efficient use of existing infrastructure and services, including water, sewer and waste services. Ongoing demand for services and community expectations will continue to place unnecessary financial burdens on service providers and greater appreciation of this is required.

In supporting the location of rural residential close to urban settlements recognition must also be given to long term growth and expansion of urban areas. AlburyCity planning policy including the RLSTT&SC seeks to protect land adjacent to the existing Albury urban growth front in the medium to long term on the basis that it has been identified as having prime potential for future urban development due the land being, contiguous with the existing Albury URA, large land holdings conducive to future urban development, accessible to existing road network and in close proximity to existing services. This seeks to recognise potentially competing priorities and focus on long term outcomes with efficient and sustainable short to medium term outcomes.

#### **Action 3.4.5 Facilitate the delivery of more affordable housing options through improved planning policies (Pages 65-66)**

AlburyCity is confident that a regime of planning policies exist in our LGA to facilitate a diverse range of housing development (inclusive of medium and high density housing options) that goes some way to encouraging affordable housing amongst the existing and future housing stock.

The nature of development in regional centres will ensure that affordable housing is available across a broad spectrum and variety of locations. It is neither appropriate or practical to provide discounted contributions where the contributions do not allow for full cost recovery in the first instance. There has been a significant uptake of secondary dwellings across the region in recent years and this has increased rental and affordable housing stocks.

AlburyCity supports NSW Government involvement and assistance in preparing necessary planning policy documentation that both facilitates and encourages Affordable Housing development. It is anticipated that this will be a collaborative process rather than a top down approach.

It is acknowledged the NSW Government intends to prepare guidelines for local housing strategies. The State Government still has a role and function in the provision of social housing and this function should not be ignored or divested. AlburyCity will continue to work with the State Government Agencies to enable and facilitate housing for all.

AlburyCity does not support specific strategic identification of sites for either caravan parks and/or manufactured home estates on the basis that this approach is considered to be both an arbitrary and pre-emptive constraint on future site development. AlburyCity favours current provisions that provide a framework from which the market will determine likely opportunities rather than arbitrarily forcing land owners to pursue affordable housing.

#### **Action 3.5.1 Investigate opportunities to improve cross-border planning outcomes, including infrastructure and service delivery (Page 67)**

AlburyCity would be a willing participant in investigating options to encourage and foster the integrated delivery of residential, commercial and industrial development and supporting infrastructure across borders. However, the role the Cross-Border Commissioner would play in cross-border land use, infrastructure and tourism planning is queried. Perusal of 2015-2018 NSW Cross-Border Commissioner Business Plan suggests that the Commissioner's role is limited to facilitating collaboration between cross-border government, community and business (via consultation processes, inter-government MOUs, etc.), encourage investment in cross-border communities and assist in creating resilient cross-border communities (via the establishment of cross-Border Business Advisory Committees) and reduce regulatory burden/anomalies (via

legislation and policy review). It is strongly considered that the role of the NSW Cross-Border Commissioner remains high level and that involvement in matters relating to land use, infrastructure, service delivery and transport planning should be guided by relevant local and State Government Agencies.

Whilst AlburyCity does not dispute that the Cross Border Commissioner has a role to play, the coordination and involvement of relevant local and State Government Agencies (both NSW and VIC) in relation to strategic planning and infrastructure planning is considered essential and most likely would deliver more tangible outcomes.

Consequently, AlburyCity requests that as an action, reference also be made to State Government Agency (both NSW and VIC) involvement into cross-border investigations.

Notwithstanding above advice, AlburyCity support a consultative approach to working towards a co-operative integrated strategic planning platform across state borders. Local Government involvement and participation in the preparation of the cross-border strategies will be essential. Concern exists where the NSW Government expects a level of consistency and/or commitment from respective cross-border agencies/councils. This needs support and facilitation from both State Government Agencies and planning authorities.

#### **Action 3.5.2 Develop a cross-border land monitoring program (Page 67)**

The Albury Land Monitor was initially based on a cross border report developed and produced by the Albury Wodonga Development Corporation (AWDC). Since the dissolution of the AWDC both AlburyCity and City of Wodonga (VIC) have taken up this reporting function. There is an opportunity to develop a co-operative approach that produces a cross border report and this can be promoted with the City of Wodonga in the first instance. This could further support exchanges and shared information across other Councils.

AlburyCity is also prepared to assist the Department in developing a reporting framework that can be adapted for other areas across the region.

**5. Goal 4 (Environment) – A protected environment and a community resilient to natural hazards and climate change (Pages 69-77)**

**Action 4.1.1 Actively manage settlement and competing land uses along the Murray River (Page 72)**

AlburyCity supports NSW Government involvement in preparing a Waterfront Management Strategy for the Murray River that manages competing uses including agriculture, industry, environmental, residential and recreation. It is anticipated that this will be a collaborative process that incorporates local government, State government agencies and community involvement through consultation processes (rather than a top down approach).

The Albury 2030 Community Strategic Plan (via the Albury Murray River Experience 2007) seeks to promote tourism by providing better synergies between central Albury and the Murray River through improved access and investment in riverfront infrastructure including riverine access, picnic/recreation areas, boat and canoe launching facilities, walking and cycling paths, recreational and community infrastructure including board walks etc. Areas that have been identified for future improvement are located in the central areas of the Albury LGA in an urban setting, and consequently, conflict with other competing land uses is not anticipated.

AlburyCity has a strategic interest in the Murray River and expect that any Waterfront Management Strategy will be informed by strategic work already undertaken. It is also noted that the Department has commissioned a study to review planning controls applicable to the Murray River (including MREP2). The draft Plan notes that this study identified the importance of continuing the use of river setback provisions to protect riverine values and provide a wide range of benefits to the environment.

AlburyCity would appreciate early involvement in any Waterfront Management Strategy and review of MREP2 on the basis that in various locations across the Albury LGA, urban and recreation zones either adjoin or are in close proximity to the Murray River. Setback and related provisions could have significant implications on riverfront development activities and investment, particularly tourism and Community infrastructure. Consequently, AlburyCity requests that through the preparation of the Waterfront Management Strategy and any review of MREP2, local government should have an opportunity to determine riverine setbacks or designate areas where setback exemptions apply (where appropriate) at the local level in the interests delivering tourism and riverfront activation projects. It is reiterated that exemptions from riverine setback are considered necessary to deliver infrastructure that will maximise use and enjoyment of the Murray River, especially in areas central to the Albury CBD or existing riverside parks and recreation areas where conflict with other competing land uses is not anticipated.

AlburyCity supports a full review of the MREP2 and development of more relevant planning controls that can be applied across the Riverine environment to promote and protect the natural environment, sustainable development and enhancement of public and community facilities.

The Riverine environment is the lifeblood of many of the cities and towns across the region and this highlights and emphasises the importance of sound, relevant and outcomes focused planning controls.

**Action 4.2.1 Facilitate improved access to quality information relating to high environmental values, to avoid, minimise and mitigate the impacts of development on significant environmental assets (Pages 73-74)**

AlburyCity is reasonably well placed with respect to the collective of environmental studies (previously undertaken) that have informed plan making processes.

The veracity of these studies and the level of protection provided to areas of environmental significance is evidenced by the conferring of Biodiversity Certification on the Albury Local Environmental Plan 2010. Whilst AlburyCity will continue to apply the precautionary principle to the assessment of any development deemed to have potential impacts on areas of environmental significance, in recognition of strategic work previously undertaken, such conflicts are not anticipated on a regular basis.

There is an opportunity for State Government agencies to work with local communities to develop and enhance appropriate strategies. This would rely on a co-ordinated whole of government approach.

**4.2.2 Maintain healthy waterways and wetlands, including downstream environments (Pages 74)**

AlburyCity is confident that its existing regime of planning controls will ensure that receiving waters and fish habitat are adequately considered through the development assessment process.

Additional planning support, as highlighted throughout the Plan, with regards to waterfront management, rural residential and urban development will help to promote and protect waterways and wetlands. Overarching local strategies based on sound overarching principles provided in the Regional Plan can deliver this objective.

- Action 4.3.1 Review and map natural hazard risks to inform land use planning decisions (Pages 75-76); and**
- Action 4.3.2 Support communities to build resilience to the impacts of natural hazards and climate change (Pages 76-77)**

AlburyCity is confident that adequate procedures already exist to manage and maintain accurate records in Albury in relation to both bushfire and flood hazard to inform appropriate settlement/development activities in the interests of achieving resilience to natural hazards (this includes the Albury Bushfire Prone Land Map – May 2014 and Albury Floodplain Risk Management Study and Plan – March 2016). However, access to specialist advice and resources will be required across the region to provide a consistent approach and framework. This is particularly relevant to local government areas with expansive natural areas with concentrated urban centres and limited specialist resources or funding.

## **Summation**

AlburyCity generally supports the draft Plan, which seeks to provide the high level strategic policy, planning and decision-making framework to guide the Riverina-Murray region's sustainable growth and development over the next 20 years, and in so doing, integrate economic, social and environmental considerations in the interests of achieving ecologically sustainable development.

AlburyCity welcomes a regional plan that supports growth and development whilst recognising the local challenges and pressures across this vast and divergent area. We are looking for a stronger commitment and direction from the State to deliver on the plans aspirations.

The Draft Riverina-Murray Regional Plan promotes a wide array of tasks, strategies and studies with a heavy emphasis on direction to and action by Local Government. It is important that action is taken to implement and deliver on these aspirations by the State. The State needs to take ownership and provide leadership on the regional plan outcomes. The lack of commitment to hard infrastructure across the region is noted and further detail and commitment to funding and facilitating the key infrastructure will be an expectation across the region.

The regional cities of Albury, Wagga Wagga and Griffith will continue to play a significant role for the region. This is not to underscore the value of local areas and communities but more importantly to acknowledge the need for the State to recognise, appreciate and commit to service provision and infrastructure delivery to the benefit of the entire region.

Once again, thank you for the opportunity to comment and participate in the development of the Regional Plan. If you would like to discuss any aspect of this submission, please contact Council's Town Planning team on 02 6023 8285.



Yours faithfully



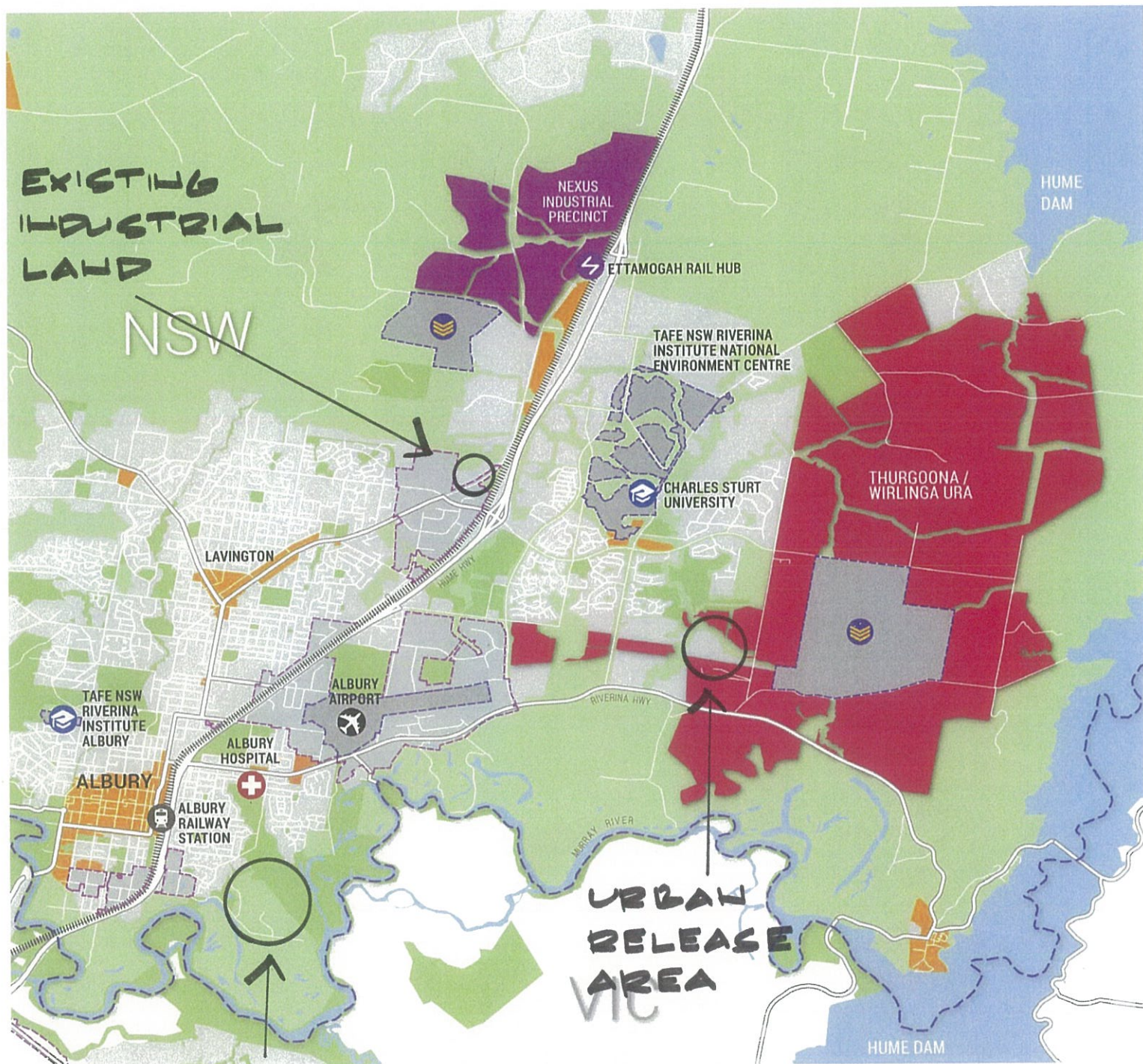
Henk van de Ven

**Mayor**

**Albury City Council**

Encl

FIGURE 12: ALBURY



## URBAN AREA : ZONED E4 ENVIRONMENTAL LIVING

Urban Release Area	Non-Urban Area	Hospital	Open Space
New Industrial Land	Urban Area	University and Education	Waterway
Existing Industrial Land	Airport	Defence Force Owned Land	Victorian Border
Business Precinct	Railway Station	Main Road	
Special Use Area	Intermodal Terminal	Railway	