



20 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

The Riverina Regional Cities (comprising Albury, Wagga Wagga and Griffith Council's) are pleased to provide a collective response to your invitation to review and comment on the recent release of the *Draft Riverina-Murray Regional Plan* (draft Plan). This submission should be considered in addition to those provided individually by each city.

The Riverina Regional Cities Group was established to promote and represent the key regional interests of the City's of Albury, Wagga Wagga and Griffith. The Group collaborate and liaise on key strategic issues and regional economic development.

The Riverina Regional Cities have been strong advocates for a regional growth plan that promotes and supports economic development and capacity building. 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 and funding critical infrastructure, underscored by a 'whole of government' approach.

In light of this, the Riverina Regional Cities 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.

Riverina Regional Cities appreciate 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.

Population/development projections

The forecast population and growth figures are conservative and underestimate demand and actual growth currently and recently occurring in the region which may result in inefficient infrastructure and land use planning. Riverina Regional Cities request 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.

Governance

The Coordination and Monitoring Committee departmental representation needs to be at the highest level (e.g. Directors) to ensure it has the authority to drive and demand the achievement of identified outcomes. The obligations of the Committee should include identification of timelines and key performance indicators for each of the actions identified in the proposed implementation plan (which is to be reported on annually). There is also some concern that governance of the Regional Plan becomes another level of administration that impacts on effective decision making and implementation.

Riverina Regional Cities are of the firm view that the Plan needs to inform State (and where appropriate Federal) Government decision making and integrated strategic planning to improve outcomes across all three levels of government and ensure the growth and development of the region emphasising whole of government approach. Riverina Regional Cities see the draft Plan as more aligned with land use planning and not yet a whole of government Regional Plan. There needs to be input into health, education and other critical elements of community well-being.

Infrastructure Coordination

Infrastructure is critical to the growth and development of any region. It is noted that as an overarching strategic planning document there is an obvious lack of detail, direction and commitment regarding infrastructure provision in the draft Plan. It is recommended that further detail and direction be provided in this Regional Growth Plan. This will provide guidance and support for Joint or Regional Organisations of Councils and Local Councils alone to develop and implement infrastructure plans that are complimentary and not in conflict.

In lieu of infrastructure gaps and priorities, Riverina Regional Cities request that further detail be provided 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.

Sustainable use and conservation of water resources

Riverina Regional Cities support 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 Regional Cities group wants to ensure that development and implementation of integrated water management is based on comprehensive investigations including socio-economic modelling.

Protection of productive agricultural lands and existing and potential areas of resource value

Riverina Regional Cities support draft Plan initiatives recognising 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 viability, operations or future extraction. Similarly, freight and energy infrastructure must be delivered to support intensive agricultural development.

Riverina Regional Cities also acknowledge that adhoc settlement decisions in the rural landscape can have potential adverse impacts on existing primary production and resource pursuits. Riverina Regional Cities support and promote strategic land use planning that protects productive agricultural lands and areas of resource value.

Improve regional transport networks and utility infrastructure to support economic activity

NSW Government support for the establishment of intermodal freight terminals and industrial precincts is welcomed. However, their success is reliant on the effective coordination of Federal, State and Local Government investment in both road and rail infrastructure.

Riverina Regional Cities refers to recommendations in the RAMROC & REROC Regional Freight Transport Plans. These projects were initiated to investigate the freight infrastructure network from a regional perspective. The implementation of integrated transport solutions for the region(s) was an overriding goal of the projects and to that end reviewed both the rail, road and air transport networks.

Inconsistencies identified between the draft Plan transport and infrastructure commitments and those recommended by the Regional Freight Transport Plan 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, Riverina Regional Cities 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 is established to facilitate co-ordinated outcomes.

Identify and prioritise opportunities to improve regionally significant local road connections

Riverina Regional Cities supports initiatives including NSW Government working with councils to identify, coordinate and prioritise the delivery of local road projects that improve the regional freight network. Riverina Regional Cities considers such work to be of critical importance to the function and overall performance of the agribusiness, logistics and manufacturing sectors in the Riverina-Murray region, especially in providing greater access to national and global markets.

Riverina Regional Cities recommends that nominated local projects be prioritised, be undertaken in the short-term and that appropriate funding be allocated to assist with implementation.

Implement local planning controls that protect regional airports from the encroachment of incompatible land uses

Riverina Regional Cities 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 existing and attracting new businesses to the region.

Riverina Regional Cities supports further investigations that offer protection to regional airport operations, recognising their significance as a supply chain resource and critical passenger access/egress point, and provide long term solutions to avoid land use conflict.

Establish monitoring mechanisms to enable better demand forecasting to inform infrastructure coordination

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.

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. Riverina Regional Cities would be willing to actively participate in development of any future mechanisms and frameworks.

Develop a regional cities strategy for Albury, Wagga Wagga and Griffith

Riverina Regional Cities applaud 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, Riverina Regional Cities 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.

Implement an industrial land monitoring program to maintain a supply of well-located and serviced industrial land

Riverina Regional Cities 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).

Develop and deliver strategies that strengthen the commercial function of CBDs and town centres

Riverina Regional Cities 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.

Deliver regionally specific urban design guidelines

Riverina Regional Cities supports urban design guidelines that are relevant and appropriate to regional areas but more importantly they need to reflect and facilitate development outcomes that are complementary to our community expectations and values. It is important to note that a one size fits all approach is not appropriate for urban design.

Recognising that regions and Cities are different, Riverina Regional Cities does not support mandatory state-wide regional urban design guidelines. Riverina Regional Cities 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.

Identify opportunities to provide improved and increased transport connections between the region's towns and villages to the regional cities

Riverina Regional Cities 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.

Riverina Regional Cities is concerned that the draft Plan does not give sufficient consideration or recognition to major commuter connections between village and towns from regional cities. Examples include Albury/Jindera/Corowa and the softwood industries heavy vehicle commuter path between Gundagai and Tumut.

Deliver enabling planning controls that facilitate an increased range of housing options including infill housing close to existing jobs and services

Riverina Regional Cities support State Government commitment to facilitate housing choice.

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.

NSW Government involvement in dictating timelines associated with the regular review and update of local strategic plans pending changes in demand is queried. Riverina Regional Cities 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 community and Council development aspirations.

Facilitate a more diverse range of housing for seniors

Riverina Regional Cities remains supportive of housing diversity. However, diversity should not come without consideration of the infrastructure and services required to facilitate and enable these growing demands. This is particularly relevant to the transport and health services in regional areas.

Riverina Regional Cities encourages and offers to participate in any review(s) aimed at supporting the future demand and meeting the needs for seniors housing.

Develop and implement principles for rural residential development

Riverina Regional Cities endorses 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.

Facilitate the delivery of more affordable housing options through improved planning policies

Riverina Regional Cities 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. Riverina Regional Cities encourages collaboration between State Government and social and community housing providers to deliver better housing outcomes. Riverina Regional Cities will continue to work with the State Government Agencies to enable and facilitate housing for all.

Facilitate improved access to quality information relating to high environmental values, to avoid, minimise and mitigate the impacts of development on significant environmental assets

Riverina Regional Cities acknowledge that there is an opportunity for State Government agencies to work with local communities to develop and enhance appropriate strategies to manage competing interests and protect environmental assets. This would rely on a co-ordinated whole of government approach.

**Actively manage settlement and competing land uses along the Murray River
Maintain healthy waterways and wetlands, including downstream environments**

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

Riverina Regional Cities has a strategic interest in riverine environments 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.

Riverina Regional Cities would appreciate early involvement in any Waterfront Management Strategy and review of MREP2 on the basis that in various locations across the each LGA, urban and recreation zones either adjoin or are in close proximity to riverine environments. Setback and related provisions could have significant implications on riverfront development activities and investment, particularly tourism and Community infrastructure. Consequently, Riverina Regional Cities request 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 requirements are considered necessary to deliver infrastructure that will maximise use and enjoyment of the riverine environment, especially in areas central to CBDs or existing riverside parks and recreation areas where conflict with other competing land uses is not anticipated.

Summation

Riverina Regional Cities 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.

Riverina Regional Cities welcomes a regional plan that supports growth and development whilst recognising the local challenges and pressures across this vast and divergent area. However, the draft Regional Plan is only a start. 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.

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 Michael Keys, Planning & Environment Director – Albury City Council on PH 02 6023 8289 or mkeys@alburycity.nsw.gov.au.

Yours faithfully



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Cr Rod Kendall
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