



## **Wagga Wagga City Council Comments for the Draft Riverina Murray Regional Plan**

### **GENERAL COMMENTS**

Council believes that the Draft Riverina Murray Regional Plan (The Plan) needs strengthening by outlining delivery milestones (short, medium or long term outcomes) against actions and specific responsibilities to the appropriate Minister/s. This will allow for clear accountability between State and Local Government for delivery and funding of actions.

Although The Plan contains a goal to grow the agricultural economy, the current Standard Instrument does not allow for many agribusiness / agritourism pursuits. A new land use definition/s is needed to allow for businesses other than grape production/wineries to follow a similar model of growth of and value adding to the agricultural product, with ancillary tourism related uses such as cafes/restaurants/pick your own fruit etc.

Council is of the opinion that The Plan is void of capturing a regional waste management planning framework and would benefit from the regional planning focus that Victoria State Government has taken with local government.

The Plan focuses on liveability and Wagga Wagga City Council (WWCC) wish to reinforce the importance of a statement that captures the sentiment of a balanced understanding of cultural, environmental and economic drivers for regional population growth and sustainability, i.e. careful consideration and planning for land use and subsequent footprints, valuing ecological communities and the balance of such with community prosperity.

The Plan could be shorter and more concise as some of the key messages are duplicated either within the same section or in different areas of the document. For example, Goal 3 is particularly long and would benefit from some consolidation (Goal 3 is 15 pages worth of text compared to Goal 2 or 4, with 9 and 7 pages of text respectively).

Council believes The Plan would benefit from considering bold and aggressive development initiatives such as the Queensland Government's State Development Areas, or special economic zones. In an example of the impact these initiatives are having on our region, Southern Oil's (based in Wagga Wagga) recent decision to expand operations in Queensland are a result of the complexities encountered within the NSW system and comparatively, the straightforward, attractive pathway through the Queensland Governments planning approvals process. The company's expansion in Yarwun (just outside Gladstone) is in a State Development Area (SDA), established by the Queensland Government to promote economic development.

Council suggests that The Plan would benefit from considering the approach taken by the Victorian Government in supporting the growth of regional cities. The role of the GAA Growth Areas Authority (now MPA – Metropolitan Planning Authority) and the investment in the planning of regional cities is seeing regional Victorian towns growing at much faster rates than similar size towns / cities in NSW.

Council undertook a benchmarking of the strategic planning of regional cities of comparable size and found that those cities with the highest investment in strategic planning were growing at a higher rate. The investment related to CBD revitalisation plans, growth strategies and integrated transport and land use strategies and hospital precinct plans. If the NSW State Government is serious about encouraging people to live, work and invest in NSW regional cities it needs to invest in the planning of these places.



## **Wagga Wagga City Council Comments for the Draft Riverina Murray Regional Plan**

### **Introduction (Page 5)**

The LGA list and figure of 26 is likely to be unsettled for a period of time and could potentially be dated soon after publishing. The list outlined the blue box has already dated.

Comments relating to the increase in an ageing population should be qualified by noting this change is not unique to the Riverina-Murray region. An ageing population is evolving across the nation and the way it has been drafted suggests the issue is somewhat isolated.

### **Image (at top of Page 6)**

WWCC request that a possible alternative image/s be supplied of the Murrumbidgee River and the City of Wagga Wagga.

### **Key Principles (Page 7)**

Key principles should also include informing State and Federal policy decisions.

### **Figure 2: Regional Vision Map (Pages 10 – 11)**

- The Murray River highlighted as a significant water way and the Murrumbidgee is not. The Murrumbidgee services the irrigation areas surrounding Griffith, Leeton and Narrandera. The Murrumbidgee should be recognised in equal significance to the Murray.
- Should airports be identified on this map?
- The proposed route for high speed rail should be identified on this map
- Concerns regarding “Major Commuter Connection” – should also pick up other regional areas – need to consider the significant freight corridor that exists
- San Isidore is an insignificant location and should not be recognised on this map. This should apply to all maps throughout the document.

### **Delivering the Plan (Page 13)**

WWWC suggests that the Federal Government Reference to be included.

### **Implementation (Page 14)**

In the implementation section there is no reference to the Implementation Plan. This is the key driver/mechanism and should be listed and broken down into some more detail. The draft lists weak and unaccountable mechanisms.

### **Local Planning Initiatives (Page 15)**

When finalised, the plan will replace the draft Murray plan 2009. Does the Riverina have a corresponding plan that will also be replaced? If so, this should be mentioned here.



## **Wagga Wagga City Council Comments for the Draft Riverina Murray Regional Plan**

When reviewing LEPs and DCPs they need to be consistent with the policies and actions of the regional plan.

### **Goal 1 (Economy) – A Growing Economy Supported by Productive Agriculture and Sustainable use of Natural Resources (Pages 17- 33)**

Council suggests that higher growth target to be included in the plan. Following that the plan needs to better reflect the diversity of the regional economy. The economic goals are too focussed on agribusiness and the logistical role on major freight corridors.

The plan could be strengthened by Goal 1 acknowledging not just the role of agriculture in the region but the diversity of the economy.

Wagga Wagga has a very diverse economy. In terms of employment only 3.8% of its workforce is employed in agriculture. The biggest employers in our region are health care 16.5% and retail trade 12.8%.

Other economic drivers such as regional tourism, the health and aged care sector, education and defence, are also key drivers of Wagga's economy.

#### **Action 1.1.1 – Provide enabling planning controls to facilitate (Page 19)**

The biggest constraint on the supply chain for agricultural businesses is poor productivity and efficiency in transport and logistics. This has not been emphasised enough here, with too great a focus on silos, abattoirs and livestock selling facilities. It is acknowledged these are notable constraints, however better access to efficient road and rail freight and export markets will have a greater impact on the supply chain. For example, Australian producers enjoy a shipping freight advantage into South-East Asia, allowing grain from Australia to be landed at a lower price than grain from Canada. However, the current high supply chain costs and inefficiencies are putting that competitive advantage at risk. A combination of small branch lines with speed and weight restrictions means many grain trains in eastern Australia carry about 2,000 tonnes per train to port - in Canada, trains can carry 10,000 tonnes at a time.

#### **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)**

WWCC strongly supports this. In addition to the policy framework proposed in this section, the action should include the mapping of land that is highly productive. This will better inform local government's strategic planning. Regionally specific data on what is important to the regional agricultural industry will assist in the assessment of productivity. This would also assist in action 1.3.3.



## **Wagga Wagga City Council Comments for the Draft Riverina Murray Regional Plan**

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

WWCC supports the sustainable use and conservation of water resources across the region. However requests further information on how the \$3.1 billion will be applied to the region.

### **Action 1.3.2 – Protect areas of mineral and energy, extractive and renewable energy potential (Page 26 – 28)**

A large scale solar farm (22 megawatts, 220 solar modules) at Bomen, Wagga Wagga has recently been approved. I am unsure if the “Riverina” solar farm is referring to this project. If it is not, WWCC requests that the solar farm at Bomen should be noted.

### **Action 1.3.3 – Avoid urban expansion and rural residential development on productive agricultural land and identified mineral and energy resources (Pages 29 – 32)**

WWCC acknowledges that large lot residential and settlement decisions in the rural landscape can have adverse impacts on agriculture. We continue to support policies that protect agricultural land capability. There needs to be a strong policy around this action, to provide certainty to local government and land owners as to the government’s position on rural residential development.

The Policy should provide a basis for determining “productive agricultural land”, including areas where patterns of fragmentation may already affect farm viability. And it needs to consider what is “commercially viable farming” as opposed to productive land, where off farm income is prevalent.

### **Goal 2 – Improved Regional Transport Networks and Utility Infrastructure to Support Economic Activity (Pages 35 - 47)**

WWCC request that greater consideration of infrastructure that supports rail and recognition that Sydney and Port Kembla is important to the region and state. The benefits of inland rail also need to be recognised.

**Connections to the Port of Melbourne** – WWCC suggests that there is a need to emphasis on improved connections in NSW and providing a clearer direction.

The content on this section is heavily focused on the increase in outward bound freight volumes as a result of agricultural activity. This is true, however inward freight volumes will also increase in line with a growing population and increased economic activity such as inputs for manufacturing based businesses. Visy for example is not directly related to agriculture, however is the largest exporter by volume in Australia. Many of the region’s biggest movers of freight are not directly related to agriculture, including Visy (paper mill) Enirgi (used lead battery recyclers) and Southern Oil (Recycling crude oil).



## **Wagga Wagga City Council Comments for the Draft Riverina Murray Regional Plan**

### **Action 2.1.1 – Identify and prioritise pinch points in the freight network (Pages 37 -40) and**

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

WWCC supports the development of the RMS urban highway corridor study. It supports continued involvement and collaborating in decision making around the upgrade of arterial road networks and freight routes that affect the city.

WWCC would like consideration given to how the efficiency of freight transport through the city can be balanced with the needs of the local community to cross roads such as Hammond Avenue and Edward Street. The current freight network divides the city and impacts on the cross ability and accessibility for businesses and community. The draft Wagga Wagga Integrated Transport Strategy recognises the Sturt Highway Corridor as the major employment zone for the city. As such it relies upon a fine grained transport system that enable people to cross and access places such as the CBD, the medical precinct and the East Wagga industrial area.

### **Figure 10: Transport Network (Page 38 – 39)**

- Missing on the map is the proposed high speed rail corridor
- Wagga Wagga Airport is not correctly located. Should be adjacent Forest Hill
- Intermodal terminal is incorrectly located. Should be at Bomen
- Label to Central West – Is this the correct description? It is also a connector to Sydney and Tablelands
- Also need to identify Holbrook to Wagga Road as a significant Road

### **Bridges for the Bush (Page 40)**

- Updated text: Kapooka Bridge has been completed and opened in June 2016.
- Eunony Bridge has recently been fully funded between both the Federal Govts Bridges Renewal Program and the NSW Governments Fixing Country Roads program. This should be listed here.
- Suggest greater discussion on a suitable city bypass being a possible outcome of the Wagga Wagga Urban Highway Study and also reference to options for a heavy vehicle alternative freight route bypass

### **Regional Freight and Logistics Facilities (Page 41)**

The Wagga Wagga High Productivity Freight Route was recently funded by the State Government and should be recognised here as a key enabler of the Riverina Intermodal Freight and Logistics Hub (RIFL). Council suggests that RIFL would be a better story for the State Government than the failed Nexus bid and could replace this in the blue box. WWCC is happy to provide content if required.



## **Wagga Wagga City Council Comments for the Draft Riverina Murray Regional Plan**

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

Wagga Wagga's land use planning controls have been designed to protect airport operations into the future. Council is keen to work with the State Government to strengthen these if necessary and supports further investigations that offer protection to regional airport functions and long term solutions to avoid land use conflict.

Council would like it noted in this section the issues relating to airport ownership in Wagga Wagga. To continue investing in the airport WWCC need security and ownership of the airport. WWCC are currently in the process of acquiring the airport and support from the NSW Government to achieve this would be welcomed.

It states in the bottom of the third paragraph that:

- *Both Albury and Wagga Wagga provide daily connections to Sydney and Melbourne and have considerable investment in air traffic control and other airport facilities.*

Although WWCC has invested in infrastructure at the airport such as terminal upgrades and strengthening of the runway WWCC has not recently invested in air traffic control measures.

### **Action 2.2.2 – Identify and protect future rail corridors (Page 43)**

WWCC fully supports this and in particular we are keen to collaborate with the ARTC in the negotiations and development of the inland rail system.

Council would like to be involved in any decisions to ensure that current pedestrian and road crossing of the rail line are not prejudiced and can be better accommodated through any proposed changes to rail infrastructure.

### **Figure 11: Potential Freight Network Improvements (Pages 44 - 45)**

- Where is this bypass suggested? Wagga Wagga, Collingullie or elsewhere? Unclear on the map and needs to be explained.
- Eunony Bridge should be included on this map as it is yet to be constructed (recently fully funded and expected to be completed in 2017)
- Potential decoupling station and interchange should be identified at Bomen
- Consider oversize vehicle impediment

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

WWCC is developing its first land monitor. Council would like to collaborate with the State Government if there are opportunities to improve and strengthen the monitoring of growth for the city.



## **Wagga Wagga City Council Comments for the Draft Riverina Murray Regional Plan**

It is our intention to provide a relevant and suitable tool to guide decision making about how the city should grow and to assist with infrastructure planning. This would require collaboration with state government and a commitment from infrastructure providers to participate in planning decisions. We would draw the State Government's attention to the precinct structure planning guidelines and approach developed by the Metropolitan Planning Authority (formerly GAA) in Victoria as a collaborative format for planning new growth areas and informing infrastructure coordination.

### **Goal 3 – Strong Regional Cities Supported by a Network of Liveable Towns and Villages that Meet the Communities Changing Needs**

WWCC suggest that this section needs to be strengthened across the board.

#### **'Evocities' Local Government Partnership Initiative (Page 50)**

Council feels that there is a lack of ongoing support from the NSW Government for Evocities and has put the Evocities future in jeopardy, with Orange recently withdrawing and citing a lack of support as the key reason. Without a renewed financial commitment, the programs future is uncertain.

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

The Draft Regional Plan does not explain how the NSW State Government will work with Council's in the development of this strategy.

WWCC suggests that the State Government may need to collaborate with the regional cities in the development of this strategy. Such a strategy needs to reflect the uniqueness of each of the three (3) cities and the roles they play in the region need to be clearly defined.

Growth will depend upon the "liveability" of the city, the ability to attract people to work, live and play and for businesses to invest.

The State Government needs to support the strategic planning of regional cities in this regard. Greater investment in CBD revitalisation plans, growth strategies, integrated transport and land use strategies and economic development strategies will assist the growth of cities. This is evidenced by the huge investment the Victorian State government is making in the planning of regional cities. Compare the growth rates of places like Wodonga, Bendigo and Ballarat with those of NSW regional cities. And compare the investment in planning. The regional cities of the Riverina need to be recognised for their role in providing a viable tree change alternative. The Evocities approach is not working as it is simply a marketing tool not an investment tool. The investment needs to be in the planning and supporting sectors that can grow jobs.



## **Wagga Wagga City Council Comments for the Draft Riverina Murray Regional Plan**

### **Map Reference on Page 53**

- North Wagga Wagga has been identified as an urban release area. This is incorrect and should be amended. North Wagga Wagga is classified as a village without potential for growth
- The Riverina Intermodal Freight and Logistics Hub should be identified on this map to be consistent with the other maps where it has been noted
- TAFE Riverina Institute (Coleman Street, Wagga Wagga) should be identified as a provider of education given the significance of the campus.

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

The draft regional plan doesn't explain how the NSW State Government will develop monitoring mechanisms for industrial lands to identify when and where infrastructure is needed

### **Bomen Business Park (Page 54)**

- The figures in the blue box need to be clarified (4,000 jobs, \$264M).
- This would be an appropriate place for the recent commitment from NSW Government to the development of Bomen and the High Productivity Freight Route.

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

Agree but can this section be more specific about each of the regional cities individually. The role of each regional city needs to be clearly defined and support given for their various initiatives for example:

- Revitalise the CBD of Wagga by supporting connections to the river and enhancing investment opportunities between the commercial core and the medical precinct.
- Increase the urban population of Wagga Wagga by making it a more attractive place to live, work and play
- Support the growth of Wagga by connecting and integrating the commercial core to the river and the medical precincts. The council is investing in turning the city to the river, (Riverside Masterplan), it is a pillar of growth for the city.
- Agree with need for health precinct plan
- Proposals for retail centres, including retail proposals? Council would like some clarification as to why the brackets are necessary
- "Proposals for new retail centres (including retail proposals) should demonstrate, how is a retail proposal different to a proposal for new retail centres?"
- Council queries whether Direction 3.2 has been drafted consistently with the rest of the document. It seems a bit more action orientated rather than defining the issues in the same way other Direction sections have done. For example, the paragraph referring to provision of education to increase skills for the workforce is not well placed and is out of context. Would be better suited on page 57 where it discusses education and skills.
- The majority of the 3.2 section is very wordy, difficult to read and could be articulated in fewer words.





## **Wagga Wagga City Council Comments for the Draft Riverina Murray Regional Plan**

The medical health precinct in Wagga is growing in an adhoc way and the negative impacts of this growth are becoming apparent. Residential and other land use conflict, lack of car parking, poor connectivity and accessibility to the major medical centres, poor lighting. The health sector is the major employer in Wagga. More needs to be done to support Wagga in developing this as a premier health precinct that can attract and support allied health, students and teaching facilities, housing for staff and students and families of patients. Council cannot plan this precinct on its own and needs to work collaboratively with state agencies in this process

Council would like to see more local planning for Regional Cities working together.

### **Direction 3.2 - Enhance the liveability and economic prosperity of the region's towns and villages (Page 56)**

Although this is supported by Council there is a need for expansion to include actions around healthy and safe communities. There is little focus in the plan on designing high quality neighbourhoods and places that will offer quality lifestyles. Again refer to the healthy built environment guidelines and the work of PCAL and UNSW.

### **Action 3.2.2 – Support the continued identification and protection of the region's heritage (Page 57)**

This action refers to two (2) distinctly different types of heritage, Aboriginal and European. I think they should possibly be split as the preservation of each is unique and requires a different focus. There is currently no mention to the differences and they are simply blended together under the same heading, heritage.

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

This needs to be a collaborative process. The plan needs to refer to the work of the Premiers Council for Active Living and the Healthy Built Environment Guidelines and the UNSW as key to underpinning this action.

Design of cities and neighbourhoods is key to improving the attractiveness and liveability of these places. This relates to providing healthy and safe environments as well as capturing landscape characteristics and how the community values their places. These points need to be reflected in the plan.

Can the Plan incorporate a set of neighbourhood planning principles similar to those included in the Illawarra Shoalhaven Regional Plan?

Need more information about how the NSW Government will develop regional urban design guidelines to be used by councils when preparing amendments to LEPS and assessing proposals.



## **Wagga Wagga City Council Comments for the Draft Riverina Murray Regional Plan**

### **Action 3.2.5 – Identify opportunities to provide improved and increased transport connections between the region’s towns and villages to the regional cities (Page 59)**

This is strongly supported. Wagga’s smaller towns and village are at risk of decline. However given the existing infrastructure and communities in its villages, government needs to ensure that decline is halted and growth supported. Key to the growth of villages and towns is to provide adequate transport services to reduce reliance on cars and enable those in outlying areas to access jobs and services in the major regional centres.

### **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 (Pages 61)**

This is very important. Can the dialogue in the plan can be strengthened around this. Wagga compared to state and national averages has a large cohort of 18-24 year olds. It is a young city.

Wagga will have nearly 60% of its population in 2036 single and two person households. What type of housing do we need for this population?

There needs to be greater government support for achieving greater density mix and diversity in housing, despite current zoning and DCP controls.

Further discussion and consideration is required on these aspects of the Plan.

Key issues facing Wagga - Recognise inappropriate housing estates and current social problems.

In paragraph 2, it notes that a *decrease in housing occupancy* is likely. I think this might mean a decrease in the rate of owner occupancy. Please clarify what is meant by occupancy in this instance.

### **Consolidation versus Character**

Can the plan refer to neighbourhood character? E.g. The urban area of Wagga has a strong traditional housing character as well as more modern houses on relatively large suburban blocks. The image of Wagga from a character perspective is not currently clearly articulated in any planning docs. Does the built form of Wagga contribute to its image and to that extent should this be retained is a question that needs to be examined in this process. Current LEP has heritage conservation area in closer proximity to CBD.

Contemporary growth management and strategic city planning research and policies promote urban consolidation, higher densities and more compact cities. This is in response to environmental footprint, energy demand, infrastructure costs, housing choice and social equity/accessibility challenges in urban areas. While the true cost of prevailing low density settlement patterns remains a contested subject in professional and academic debates a relied upon piece of recent research on this topic by Curtin University Sustainable Policy Institute comes down in favour of urban consolidation (Assessing the Costs of Alternative Development Paths ) Australian Cities, Parsons Brinkerhoff September 2008).



## **Wagga Wagga City Council Comments for the Draft Riverina Murray Regional Plan**

The case for consolidation has already been suggested through the Wagga Spatial Plan, yet not reflected in the areas earmarked for development. However the apparently contradictory forces of established urban character and the consolidation imperative need to be reconciled and decisions made about where inner urban infill and redevelopment of existing established areas (e.g. Ashmont / Turvey Park) can contribute to meeting housing needs for the city.

### **Density in New Neighbourhoods**

Related to the above issue is the question of appropriate housing densities to be achieved in new suburbs. The City of Wagga (not sure about state) currently does not have targets for densities in new residential areas. (Compare with QLD and VIC who target a density of 15 lots per ha net in new urban growth areas). Can the plan provide guidance on this?

On average in new areas in Wagga Wagga there appears to be an average of 8 dwellings per ha.

A target of 15 lots per ha may not be appropriate in the Wagga context however some consideration needs to be given to a reasonable target to meet future housing needs.

Relevant to this discussion is the question of the expectations or preferences of the residents of the new developments. Anecdotally there appears to be the 'green change' or 'tree change' phenomenon whereby households or new residents seek lifestyle blocks in rural settings close to rural centres offering a high standard of services and facilities.

The requirements of the lifestyle block sector suggest the existence of a demand for larger lot sizes and lower settlement densities.

However the preferences for this high profile segment must be balanced against the less widely promoted housing needs of other segments, including those who are unable to afford suitable housing.

At an individual level smaller dwellings on smaller lots townhouse or apartment style dwellings would, in theory better suit the physical capabilities and financial resources of ageing and lower social-economic households. At the broader community level, these households would also be expected to benefit in social equity and accessibility terms from a shift to a more compact, public transport connected and walkable settlement pattern.

Council would be pleased if the Plan could provide more definition around what guidance it will give on the above matters.

### **Action 3.4.2 – Facilitate a more diverse range of housing for seniors (Page 62 – 64)**

Council strongly supports the facilitation of a more diverse range of housing for seniors, however it must be evidenced based and relies upon actions 1.3.3 and 1.2.2. Can these actions be integrated?

Council requires why seniors housing is allowed on Regional land, we need to also consider social amenity for aged housing.



## **Wagga Wagga City Council Comments for the Draft Riverina Murray Regional Plan**

The principle 2 needs to be strengthened to include roads and social and community infrastructure on page 64.

Must ensure that a one-size fits all approach is not taken. There must be recognition of the regional and local issues with respect to rural residential development. Wagga is prepared to collaborate with the state government on the development of these.

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

Council supports this concept however, the draft regional plan doesn't provide information about how to include affordable housing in model controls. More detail is required about the bonus provision to deliver a percentage of affordable housing and other incentives to deliver affordable housing.

The draft regional plan states that the NSW State Government will prepare guidelines to prepare local housing strategies. Not sure of the implications for Council. This needs more discussion and consideration.

### **Photographs on Page 68 (Goal 3)**

Council has requested an image of Wagga Wagga Riverside be incorporated either on page 68 or elsewhere in Goal 3, staff at WWCC would be happy to supply a favourable image.