



Hilltops Council provides the following comments on the *Draft South East and Tablelands Regional Plan*.

General comments

Hilltops Council supports the overall approach of the plan in balancing growth and change with environmental management and service provision. The strong diversity and wide geographic spread of the area covered by the plan presents challenges in presenting a single, unified and cohesive approach to the issues of the region and Council acknowledges the work the Department has done in developing a plan that aims to manage that diversity.

The diversity of the region will present ongoing challenges in ensuring equitable and practical implementation of the plan. While Council supports the proposed governance structure to manage its implementation, delivery of the plan will need to recognise that the region's diversity may require flexibility in delivering outcomes to respond to the diverse and varied needs of the region.

The ideals established in the vision are generally supported, however have a focus on urban, rather than rural areas where elements of the vision are less relevant and viable. Transport options, access to high-speed broadband, and sustainable servicing of residential areas, for example, are likely to remain key issues for rural areas where lower population bases, lower economic growth and disparate settlement patterns work against delivery of the vision.

In general, Hilltops Council sees the plan as strongly focussed on Canberra and the south coast areas of the region, with less analysis of the agricultural areas in the north of the region and fewer strategies identified to support that section of the region's growth. While the strengths and opportunities of Canberra are rightly drawn out in the draft plan, strategies to address the disadvantage in terms of population, education, economic and retail loss from areas such as Hilltops to Canberra have not been identified. Only the southern-most parts of the Hilltops Local Government Area (LGA) may be considered on the outer edges of the 'commuter belt' of Canberra and, as a result, few of the strategies identified in Goal 1 have relevance to Hilltops. Similarly, a strong focus on the southern coastal area in Goal 2 does not draw out important land management issues for agricultural areas of the region.

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Priority growth sectors

It is not clear why a priority growth sector of “primary industries and renewable energy” has been identified as a single priority. While rural lands are generally the locations for wind and solar energy facilities, they can be conflicting land uses and have been (and continue to be) the cause of community discontent. The linking of these two elements as a priority area does not recognise the importance of agricultural activities to areas like Hilltops and tends to suggest the value of rural lands is in ‘wind farming’. Agriculture makes up some 46% of the economy and production of the former Boorowa area, with a similar figure in the former Harden area. Furthermore, horticulture, grazing, wool and cropping continue to be the mainstay of the broader LGA, with intensive agriculture becoming an emergent element of the agricultural economy.

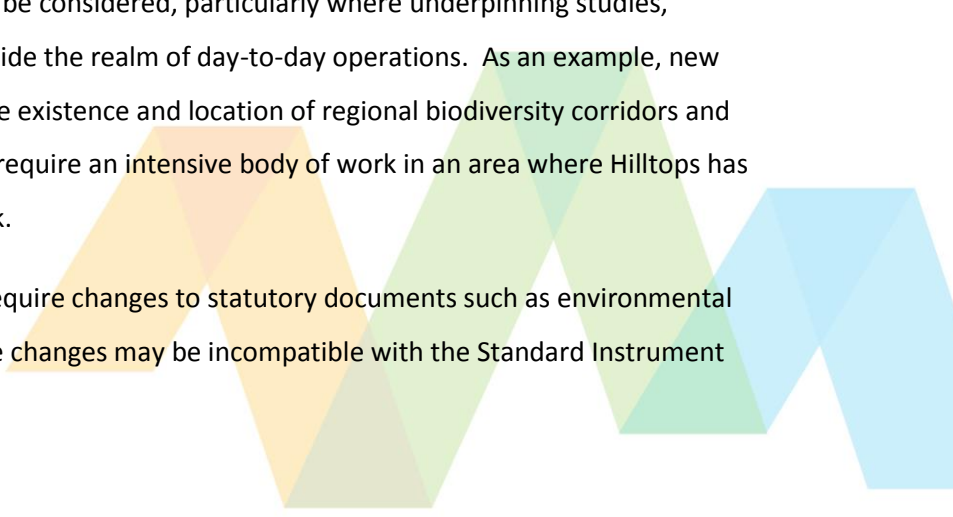
With the growth of intensive farming industries (piggeries and poultry farms) in the LGA and the presence of an abattoir in Young, there are opportunities to provide for ‘value-add’ services in terms of food processing industries. There is also the opportunity to build upon the existing ‘Hilltops’ food and wine branding. More broadly, Council has seen an increase in interest and operation of smaller, farm-based rural industries, including the production of free-range products and organic vegetable production and sales. In addition there has been a steady increase in home-based ‘value-add’ enterprises such as jams, boutique wines, smallgoods, etc. Another emerging element in the agricultural area is farm stay accommodation and farm experiences.

Other opportunities exist that can be sensibly linked to intensive farming. A number of composting facilities exist in the LGA and Council is seeing an interest in their expansion and in the establishment of new facilities. The management of effluent and wastes from intensive farming is an ongoing issue for operators and increasing links between these land uses may provide for a targeted growth area.

Delivering the plan

Many of the strategies in the draft plan fall to Local Government to implement, often through changes to environmental planning instruments. The resourcing of Local Government’s implementation of the plan needs to be considered, particularly where underpinning studies, mapping and other activities fall outside the realm of day-to-day operations. As an example, new requirements to map and validate the existence and location of regional biodiversity corridors and offset possibilities (Action 2.1.2) will require an intensive body of work in an area where Hilltops has no real data base from which to work.

A number of the Actions appear to require changes to statutory documents such as environmental planning instruments. Some of those changes may be incompatible with the Standard Instrument



approach that the State Government has adopted, which allows limited flexibility in responding to local needs. Action 4.2.1, for example, could result in an increased application of 'Special Use' zonings that work against more coordinated and cohesive planning across urban areas. Similarly, the 'template' Local Environmental Plan does not easily adapt itself to incorporation of the broad range of policy documents referred to in the Draft Plan (such as that on page 32). Similarly, the appropriateness of using (non-statutory) Development Control Plans as a means to deliver State Government policy is questioned. Relying on councils to amend their planning documents as a means to deliver outcomes simply continues the existing approach that relies on individual development applications to manage broader environmental issues and impacts.

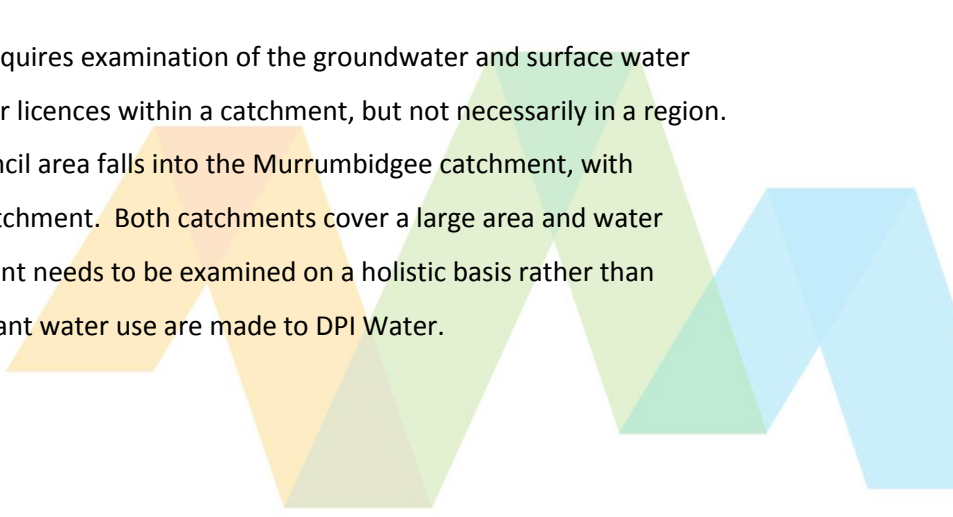
The implementation of these Actions is particularly onerous on councils, such as Hilltops, that have recently been subject to amalgamations. There is already a significant amount of work to be done in the planning sphere of these councils to bring former council planning instruments into a single unified document for the entire LGA. The additional work to incorporate changes such as proposed in the draft Plan only adds to this significant workload.

Water management initiatives

Planning for long term water security that caters for growth and impacts of climate change is essential. There are opportunities for improved security and economic opportunity through interconnectivity of supplies such as linking Boorowa to Goldenfields in the Hilltops and Yass to the ACT in the Greater Capital areas.

Water security is a key issue for the Boorowa area of Hilltops Council in particular and Council has worked closely with various agencies of the State Government to progress infrastructure options for securing a sustainable water source for town residents. The Draft Plan focuses on Councils preparing integrated water cycle management strategies (IWCM) as the mechanism for protecting and ensuring water supplies. However IWCMs are only one part of the complex water industry regulatory framework; linking them to infrastructure investment and supported them with Developer Servicing Strategies and Contributions Plans need to be part of the broader strategy.

Furthermore to be fully integrated requires examination of the groundwater and surface water systems and the ability to trade water licences within a catchment, but not necessarily in a region. For example part of the Hilltops Council area falls into the Murrumbidgee catchment, with remainder falling into the Lachlan catchment. Both catchments cover a large area and water availability across the entire catchment needs to be examined on a holistic basis rather than piecemeal as applications for significant water use are made to DPI Water.



Freight and transport

The Draft Plan has a clear Canberra and south coast focus on freight and fails to understand the importance, impact and opportunities that freight has in the Hilltops area. Road freight travelling north and west off the Hume Highway travels on one of three classified routes through the Hilltops LGA; the Olympic Highway, Lachlan Valley Way and Burley Griffin Way. There are limited service facilities (truck stops with sanitary facilities, for example) along those three routes to support the safe movement of vehicles.

Each of those key routes runs directly through the main townships of the Hilltops LGA (Young, Boorowa and Harden), creating real infrastructure and amenity impacts for Council and its residents. The seasonality of the agricultural economy can intensify those impacts. An increasing commuter population residing in Boorowa adds volume and safety risk to the Lachlan Valley Way corridor. The NSW Roads and Maritime Services has recognised the importance of the Lachlan Valley Way, and is currently preparing a corridor study to plan for and manage the volume of freight and other vehicles that use the corridor (through Boorowa) to reach Cowra and beyond to the north and west.

There are intermodal points within the Hilltops LGA – most notably at Cunnigar – where freight impacts are intensified, but where opportunities exist for intermodal facilities to support the movement of freight (and agricultural produce in particular). The recent announcement of the pilot funding under Fixing Country Rail for the upgrade and reopening of the Miamuru to Demondrille Rail Line presents opportunities for other freight linkages and intermodal points.

Transport options, other than private passenger vehicles, are very limited across the Hilltops region and can act to limit access to health, education and other services for Hilltops residents. Community groups have, of their own initiative, instituted weekly bus services to Canberra, otherwise reliance is on infrequent, but regular, CountryLink buses and train services to Sydney. In reality, the population base and distribution of the LGA provides limited scope for more formalised public transport options, however the ongoing reliance on Canberra by the (ageing) Hilltops population for health, education and retail services places ongoing demands on road infrastructure will need to be more strategically managed into the future.

Hilltops Council notes that it is also part of the Murray-Murrumbidgee Regional Transport Plan; however no connections have been drawn within the draft South East and Tablelands Regional Plan. Given the strategic importance of both documents, there is a real need for integration between the two.



Environmental initiatives

The initiatives in the plan in the area of environmental management appear, again, to be strongly focussed on the south coast. The Hilltops LGA as a whole has less than 15% native vegetation remaining, with remnant vegetation and areas of biodiversity existing largely along road corridors. While the Draft Plan focusses on flood management, it proposes nothing in relation to broader land management issues that have the real potential to reduce agricultural productivity and viability, such as erosion, salinity, weed management, on-farm practices and management of the water table.

The climate change strategies outlined in Action 2.3.2 are ill-defined but have the ability to shape and influence all other actions listed in the plan. Again, many of the actions in this area appear to result in the need for Councils to revise their planning documents. In order for Councils to achieve this it will be necessary for the sharing of data and data sets (such as EEC mapping) by State agencies with Councils, or by making them freely and simply available in the public domain.

The plan has little regard to the Enabling Adaption in the South East (EASE) and Integrated Regional Vulnerability Assessment (IVRA) work that was done with the NSW Environment and Heritage. This work identified the vulnerabilities of the region and aimed to forecast the effects of climate on the quadruple bottom line of the region. Hilltops Council believes that the findings and recommendations from this work would provide useful guidance in the Regional South East and Tablelands Plan.

