

20 August 2016

**Director Regions, Southern,
Department of Planning and Environment
PO Box 5475
Wollongong NSW 2520**

**Planning Institute of Australia Submission on Draft South East and
Tablelands Regional Plan**

The Planning Institute of Australia (PIA) welcomes the opportunity to make this submission on the Draft South East and Tablelands Regional Plan. This submission has been prepared by Members of the NSW Division (PIA NSW).

PIA is the peak body representing professionals involved in planning Australian cities, towns and regions. The Institute has around 5000 members nationally and around 1200 members in New South Wales. PIA NSW plays key roles in promoting and supporting the planning profession within NSW and advocating at all levels in relation to key planning and public policy issues.

It is acknowledged that the draft plan in its format of 'goals' and 'directions' is a more easily interpreted and readily issue-related document than previous regional plans.

Our submission will concentrate on a few issues that are of particular concern and which we believe require further explanation as to how the Directions will be implemented and the consequences ensuing from those actions. Although it must be acknowledged that many of the actions and inferred programs would be undertaken at a Local Council or community level, the absence of this finer detail and responsibility will ultimately undermine the main aims and goals.

This review will specifically address the following five Directions within the Draft Plan:

Direction 1.1 – *Provide well-located and serviced land for housing in the Greater Capital region to meet demand.* It is noted that the draft plan acknowledges that the ACT housing economy is impacting adversely on cross-border Council land development strategies. This is due mainly to the internal strong demand for lower cost land and housing options, not currently available within the ACT. Many ACT workers are seeking options external to the ACT, to supplement supply. This is driven in part by the policies of the ACT Land Development Authority. The Draft Plan states that:

“Over half (53 per cent) of projected demand for new housing in the region is expected to occur in the Greater Capital [external of the ACT]. This equates to 14,750 new dwellings”.

A number of new home seekers and those looking to establish homes on larger land allotments are seeking options within areas such as Murrumbateman, Gundaroo and Sutton. Although these traditional villages/areas do have surrounding land capacity to possibly accommodate this demand, neither the village nor community structures will be adequate for the growth and importantly infrastructure is not in place to provide sustainable servicing. Similarly the smaller NSW Local Councils have not always anticipated this pressure and appropriate settlement strategies are either outdated or have not factored for the ACT influx. The draft plan acknowledges this cross-border pressure:

“Additional pressure for housing in NSW is being driven by ACT policies for more compact settlement and housing affordability. This is leading to development proposals that are inconsistent with current planning strategies in areas close to the NSW and ACT border – mostly within Yass Valley Local Government Area. These proposals have the potential to undermine sustainable urban outcomes from identified new urban areas and place undue pressure on infrastructure capacity”.

Additionally the Draft Plan states, that:

“The availability of water will continue to be a key driver and limiting factor on the amount and location of any additional urban development in the Greater Capital”.

The included actions (Action 1.1.1 & 1.1.2) although giving some acknowledgement that something must be done, do not inspire confidence that either the NSW Government nor the ACT Land Authority are committed to a sustainable solution. There is no mention in the Draft Plan as to those measures, actions and infrastructure provision that will take place to assist local NSW Councils in managing a solution.

While this Direction specifically addresses the Greater Capital Region, it should be recognized that much of the WIngecarribee Shire and surrounding areas are facing similar growth demands from the Greater Sydney Region. This includes managing the Sydney Drinking Water Catchment as a regional asset.

Direction 2.2 – Manage development to protect the Far South Coast environment.

As mentioned within the Draft Plan, the Far South Coast is uniquely blessed with a biodiversity of marine and terrain environments, and it is fortunate that much of the coastal area is protected by State Reserves, environment conservation areas and National Parks. However, those areas not so protected will be increasingly under pressure from urban growth and the varied human activities and leisure pursuits associated with increased population.

Predicting and ultimately locating growth for urban land demand can be accommodated in two basic ways – either through identifying ‘green-field’ expansion areas or through densification and maximisation of the existing urban footprint. In real terms, Local Council settlement strategies adopt a combination of both. However, the Draft Plan gives very little mention of the value or optimal use of the existing urban footprint to accommodate future growth. In assuming that the quoted growth demands for future dwellings are reasonable, the Draft Plan states that:

“Projections for the Far South Coast indicate that an additional 5,400 dwellings will be required to meet population growth by 2036. Councils have indicated that existing release areas currently have capacity for almost 13,000 new dwellings. No additional land needs to be identified in the medium term, however, planned growth needs to be carefully managed to achieve sustainable environmental outcomes”.

Therefore, based on these figures the Far South Coast currently has over-capacity allocation for future growth. Understanding that possibly much of this growth will be ‘green-field’ land, there needs to be very well mapped and documented plans in

place to ensure that the growth occurs sustainably and sequentially to support the existing services and infrastructure and does not occur as a random or haphazard process. Simply mapping where the growth areas are located will not be sufficient to plan and manage this growth.

The single action (Action 2.2.1) as stated in the draft plan: “*The NSW Government will: work with Eurobodalla and Bega Valley Shire Councils to develop urban growth area maps to guide sustainable growth on the Far South Coast*”, does not give confidence that sufficient investigation and integration of all components of supply will be managed to accommodate the future expansion areas. It is to be hoped that where it is necessary to extend the growth beyond the existing urban footprint, that adequate and detailed servicing and infrastructure planning will be integrated with and precede, the release of that land.

Direction 3.2 – Enhance the productivity of primary industries. Although the function and contribution of primary industries is a significant component of the Region’s economy, primary production is dependent upon the location and availability of a natural resource. However, it is only one industry that relies on the use of and access to those resources. The Draft Plan does also refer to the other players in accessing land-based natural resources, such as energy, extraction and mining. However, in identifying those industry participants that rely on the natural resources and ensuring they have appropriate protection and ability for continuance is heavily predicated on the appreciation of where those resources are located and in what capacity and accessibility they offer.

The Tablelands in particular are ideally located for agricultural business in terms of transport routes to markets in Sydney, Wollongong and Canberra, as fresh produce can easily be moved to all three locations. A sound strategic approach is required to manage these peri-urban areas to ensure that their inherent rural values are not overlooked in the discussion of how to meet population and housing demand. Initiatives to develop Food Security, and other related economic drivers should be recognised in the draft Plan.

There is the potential for greater co-ordination and co-operation between Local Councils and State Agencies such as the Department of Primary Industries in sharing and accessing of relevant data and mapping to allow full appreciation of the resource potential. Across-agency policy and legislation disburdenment will facilitate the freeing-up of retained information thus allowing for more informed

planning and protection of resource lands. Although the Draft Plan identifies the need to map agricultural lands; “*map land that is highly suitable for agriculture and industries to better inform strategic and local planning processes*”, this mapping and government assistance should extend to all natural resource assets.

Direction 3.4 - *Grow regional strategic assets to support economic growth across the region, (page 57)*, focuses on existing infrastructure such as the Eden breakwater wharf and Canberra Airport. It is suggested that the Plan should include the Sydney Drinking Water Catchment as a regional asset.

Direction 4.1 – *Provide sufficient housing to suit the changing demands of the Region.* The traditional role of housing monitors to track and forecast the local and regional take-up and supply of housing styles may need to be reassessed as the gradual shift in household make-up moves to the smaller household unit. Pressures from land and housing affordability and the ageing of the population will shift the emphasis from individual houses on single allotments to smaller and more compact accommodation and will also favour locations close to transport and service nodes. This change will assist in optimising the existing urban footprint with its associated infrastructure.

Many of the traditional housing forms are unsustainable and will become cost prohibitive for both the home owner and Local Councils to consider into the future. The large allotment and rural residential style of development is the most unsustainable land-use and as an accommodation style has the shortest tenure and most frequent owner turnover. This is well articulated within the draft plan:

“Environmental impacts associated with rural residential subdivision can be significant. The impacts on water catchments due to the proliferation of dams and bores associated with water supply to these developments, especially in stressed river catchments, has led to a water licencing embargo in areas such as the Yass River Valley in the past. When located in areas of intact bushland, the clearing necessary for house sites, bushfire asset protection and associated infrastructure, has led to high clearing rates over time. Clearing associated with rural residential subdivision is currently the major source of vegetation removal in the Far South Coast and Southern Tablelands”.

The gradual erosion of agricultural resource lands to housing and rural residential sub-division is well documented and most Local Councils now understand the negative impacts of this style of development. The Draft Plan should acknowledge the detrimental effects of this housing choice and Councils should be encouraged to only consider zonings for this housing option where the development will not directly conflict with the preservation of agricultural lands.

The Draft Plan does identify the benefits of concentrating further housing options within the existing urban footprint:

“Making more housing available in existing urban areas is a sustainable option because it takes advantage of existing job markets, commercial and retail opportunities, and infrastructure such as public transport and facilities for pedestrians and cyclists”.

However, the Draft Plan does not carry through with a corresponding and clear action to drive a change in planning outcome. Many individual Councils are under resourced and some regional Councils are lacking effective planning guidance to properly implement the change necessary to drive a more informed planning direction. In these situations there needs to be a greater participation by State agencies to steer that change and provide the necessary guidance through guidelines and broader strategies such as the Draft Far South Coast and Tablelands Regional Plan.

In conclusion, the Draft Plan has brought together many of the challenges facing present day planning for the Region and highlighted those goals and directions required to address those challenges. However, like many of the preceding plans for the Region, the dialogue is very high level and although well intentioned, there is little in described measures to implement those directions and many of the actions do not address the finer grain of how and to what capacity, those actions will be followed through.

Follow through with all Councils and Agencies to ensure that the goals are reflected in good local planning legislation and policy outcomes on the ground will be critical to implementation.

PIA supports in principle the Regional Plan and its strategic policy direction for housing, economic growth and environmental protection across the Region.

The successful implementation of the Plan will provide benefits to the

community in respect of housing, jobs, environment, resources, community services and infrastructure provision.

We welcome ongoing engagement on the draft South East and Tablelands Regional Plan and are happy to elaborate on any of the matters covered in this submission.

Yours Sincerely

A handwritten signature in dark ink, reading "Marjorie Ferguson". The signature is written in a cursive style with a large initial 'M'.

Marjorie Ferguson RPIA
NSW President