

Contact: Emma-Jayne Leckie

23 August 2016



Southern Region
NSW Department of Planning & Environment
PO Box 5475
WOLLONGONG NSW 2500

Dear Sir/Madam

Subject: Submission to Draft South East and Tablelands Regional Plan

Thank you for inviting submissions to the *Draft South East and Tablelands Regional Plan* and visiting Goulburn to present the draft Plan on 16th June.

Following a detailed review of the document, Council at its 3 August 2016 meeting resolved to endorse the enclosed submission.

Council looks forward to working with the Department of Planning and Environment to further refine the draft Plan.

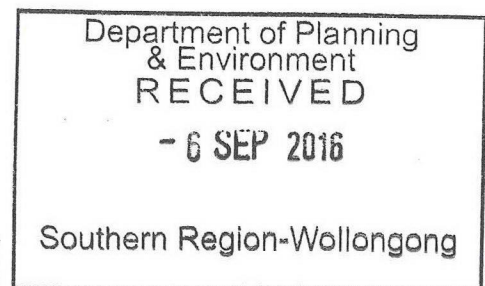
Should you require clarification regarding any matters raised in the submission please don't hesitate to contact Emma-Jayne Leckie, Business Manager Planning & Strategic Outcomes, on (02) 4823 4535 or emma-jayne.leckie@goulburn.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Louise Wakefield', written in a cursive style.

Louise Wakefield
Director Growth Strategy & Culture

Encl. Submission: *Draft South East and Tablelands Regional Plan* (#828324)



General comments on the Plan

- The plan lacks an appropriate implementation framework. Timeframes and responsibilities for actions are necessary to ensure the goals and directions of the Plan are achieved.
- The overall framework of the existing regional strategy is generally favoured over that proposed in the draft Plan. In that regard the Plan generally provides insufficient guidance to assist councils with: spot rezonings not addressed in existing council strategies; and planning for growth based on a specific contribution to the region. Council expected the Plan to include more specific guidance for each local government area and it is disappointing this is not the case. Additionally some of the actions lack the specificity required for effective implementation.
- The draft Plan does not adequately define and address the role of Goulburn Mulwaree as a regional centre. Council is committed to growth in Goulburn Mulwaree which plays on its strengths and realises its opportunities. This commitment is to be reflected in preparation of land use strategies and marketing programs currently being developed. Council is disappointed that the Plan does not recognise the potential of the Goulburn Mulwaree and the role it can and does play in the broader region.

Specific comments on the Plan

Goal 1 – Sustainably manage growth opportunities arising from the ACT

Direction	Goulburn Mulwaree Council comments
<p>DIRECTION 1.1 Provide well-located and serviced land for housing in the Greater Capital to meet demand</p>	<ul style="list-style-type: none"> • The direction focuses on providing housing supply in the Greater Capital. The Plan acknowledges areas in Murrumbateman (approximate 30 minute drive) and Yass (approximate 50 minute drive) as appropriate locations to cater for Canberra workers travelling for work in the ACT. As a general comment the Plan does not adequately consider Goulburn as a potential growth location whether to cater for opportunities arising from the ACT (60 minute drive) or elsewhere.
<p>DIRECTION 1.2 Improve cross-border transport connectivity</p>	<ul style="list-style-type: none"> • The aim of the direction is to improve transport connectivity between the ACT and NSW. The direction lacks consideration of intra-regional transport issues including increases in alternative modes including public transport (train/buses) that could facilitate the ACT workers living in NSW. • Consideration of these aspects in the Plan would further assist Goulburn Mulwaree Council's recent efforts to increase the number of bus connections between Goulburn and Canberra. • Goulburn's connection to Nowra/Port Kembla via Main Road 92 should also be considered in the same way as the Queanbeyan – Batemans Bay Corridor Strategy. • Projects such as Canberra's light rail (that will run along Northbourne Avenue) should be discussed including how this infrastructure will assist NSW residents travelling to the ACT • The development of Canberra's light rail could have implications for residents living in NSW and working in the ACT.

Goal 2 – Protect and enhance the region’s natural environment

Direction	Goulburn Mulwaree Council comments
<p>DIRECTION 2.1 Protect the region’s diverse environmental values</p>	<ul style="list-style-type: none"> • Action 2.1.1 states the Government will ‘require that councils and development proponents protect the high environmental value lands in rezoning decisions’. What is the proposed mechanism to ensure these lands are conserved and what status will the high environmental value lands map have in relation to rezoning decisions i.e. will it be linked to a Section 117 direction? Council suggests that guidelines be prepared on the validation required in relation to whether or not a site proposed for rezoning is ‘high environmental value land’ in order to assist with implementation of the action. • Action 2.1.2 – Council suggests this action will not provide sufficient assistance to local councils to protect regional corridors through LEPs. The action states that the government will identify opportunities to protect and enhance the function and resilience of biodiversity corridors in strategic plans. It is suggested that these opportunities would need to be considered in standard LEP amendments and/or a s117 ministerial direction.
<p>DIRECTION 2.2 Manage development to protect the Far South Coast environment</p>	<p>No comment</p>
<p>DIRECTION 2.3 Build the region’s resilience to natural hazards and climate change</p>	<ul style="list-style-type: none"> • It is suggested that this Action 2.3.2 is not specific enough for councils to practically address resilience to climate change. Perhaps the action should focus on the Enabling Adaptation project and/or some specific outcomes/measures for Council to address.
<p>DIRECTION 2.4 Protect and secure the region’s water resources</p>	<p>No comment</p>
<p>DIRECTION 2.5 Protect the region’s cultural heritage</p>	<ul style="list-style-type: none"> • Action 2.5.1 states that the Government will provide resources for the provision of heritage advice to inform planning processes. More detail is required including what the intention is for obtaining such heritage advice. • It is suggested that some guidelines on the extent of studies and consultation with Aboriginal and other stakeholders at the strategic planning stage would be useful to ensure consistency in approaches throughout the region.

Goal 3 – Strengthen the economic opportunities of the region

Direction	Goulburn Mulwaree Council comments
<p>DIRECTION 3.1 Support and promote the growth of the tourism industry</p>	<ul style="list-style-type: none"> Action 3.1.1 relates to improving transport services. Alternative transport modes or infrastructure upgrades should be considered. Perhaps another option would be to work with local councils with tourism ‘hot spots’ to determine location-specific measures to address the influx of visitors e.g. park and ride schemes. Council suggests there should be a greater focus on harnessing the benefits of visitors and tourists travelling through the area. If road is the preferred option for travel there is an opportunity for towns and villages located along and within close proximity to major transport routes to gain from tourism. Appropriate locations for stop-overs and places to eat/drink between Sydney and a destination (such as the far south coast or Snowy Mountains) should be promoted.
<p>DIRECTION 3.2 Enhance the productivity of primary industries</p>	<ul style="list-style-type: none"> Council supports the development of profiles for agricultural industries and mapping of agriculture and industries regionally in Action 3.2.1. Councils should be involved as key stakeholders in this process. Consideration should be given to the final product and how it is intended to be used during the LEP amendment process (e.g. the Farmland Protection mapping applicable to the Far North Coast) Council suggests that resources and support would be necessary to implement Action 3.2.2. The establishment of planning controls for buffers is often controversial and there needs to be a consistent approach taken across the region. Goulburn’s Rail Freight Hub should be mentioned under Action 3.2.2 for its role in processing and packaging of forestry logs for export. Council suggests that new opportunities for agriculture including emerging practices that would be suitable in the region should be explored. This may include opportunities for intensive agriculture and export to Asia via Canberra Airport.
<p>DIRECTION 3.3 Support the productivity and capacity of the region’s mineral and energy resource lands</p>	<ul style="list-style-type: none"> There is already an existing framework for Action 3.3.3 i.e. a Section 117 direction and associated Mineral Resource Mapping. The existing mapping could be updated and some more specific guidance provided to Councils around consideration of land use conflict. Regarding Action 3.3.4 more detail needs to be provided around the land use plans and how they are to used/considered in the strategic planning and rezoning process. The Veolia Bioreactor at Tarago and South Marulan Limestone Mine should be mentioned in this section. Quarries are significant economic assets however the lack of associated infrastructure including transport connections/roads can cause significant impacts on the community.
<p>DIRECTION 3.4 Grow regional strategic assets to support economic growth across the region</p>	<ul style="list-style-type: none"> Action 3.4.2 (regarding protection of Canberra airport from residential encroachment) is supported. However Council considers that the Plan does not adequately explore the economic growth opportunities for the entire region resulting from the airport e.g. linking the region to national and international locations. Freight networks should mention Main Road 92 and Goulburn’s Rail Freight Hub (connection to Port Kembla).

Direction	Goulburn Mulwaree Council comments
<p>DIRECTION 3.5 Strengthen the economic self-determination of Aboriginal communities</p>	<ul style="list-style-type: none"> Regarding Action 3.5.1 what is the intent once the constraints mapping has been undertaken? How will this relate to the preparation of Planning Proposals?

Goal 4 – Build communities that are strong, healthy and well-connected

Direction	Goulburn Mulwaree Council comments
<p>DIRECTION 4.1 Provide sufficient housing to suit the changing demands of the region</p>	<ul style="list-style-type: none"> Regarding Action 4.1.1 further discussion and actions are required specifically in relation to affordable housing and aged care housing across the region. Preparation of guidelines for local housing strategies are supported however there is no timeframe indicated in the Plan. Goulburn Mulwaree Council is currently undertaking strategic work around housing. Perhaps targets for different housing types and/or more direction for local Councils about their individual priorities for housing should be considered (within the context of the entire region). Action 4.1.2 does not provide any guidance to councils when considering planning proposals for rural residential outside of identified settlement areas. In that regard it is much weaker than the Sydney Canberra Corridor Regional Strategy. Council supports the preparation of guidelines for affordable infill housing.
<p>DIRECTION 4.2 Plan for facilities, including health and education, to service the region's growing and changing population</p>	<ul style="list-style-type: none"> Regarding Action 4.2.1 Council generally supports the principle of facilitation of growth of complementary health uses around existing sites but is interested in what form will this take and what role will councils have in these decisions. Regarding Action 4.2.2 Council suggests consultation with councils regarding future growth is needed for school asset planning.
<p>DIRECTION 4.3 Strengthen the commercial function of the region's centres</p>	<ul style="list-style-type: none"> Action 4.3.1 is supported but could be broadened to look at other opportunities to strengthen individual regional centres. Perhaps the focus should not be on regional centres only. The Plan is not specific enough when a council receives a planning proposal or development application that has the potential to undermine a commercial centre. Perhaps the State Government action should refer to 'significant positive social and economic benefit' and/or provide a methodology or framework for councils to assess these benefits. The Draft Centres Policy went some way towards doing this and perhaps more policy on this area is required.
<p>DIRECTION 4.4 Build socially inclusive, safe and healthy communities</p>	<ul style="list-style-type: none"> Action 4.4.1 is supported. The establishment of consistent planning principles will assist in preparing local government strategies and planning controls. Guidelines for the access to public recreation? Where and what will should it look like? What prioritisation should be given to cars over pedestrians/cyclists? How do we improve existing areas that do not have these facilities? What access should suburbs have to retail services?

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Direction	Goulburn Mulwaree Council comments
<p>DIRECTION 4.5 Enhance community access to jobs, goods and services by improving connections</p>	<ul style="list-style-type: none">• Action 4.5.2 is not sufficient to enable long term planning for a high speed rail corridor especially given preliminary studies have already been undertaken that outline options for a proposed route. Council requests that a much stronger stance is taken on this important matter in order to progress route planning and ensure that any proposed corridor is not compromised by urban or rural residential expansion.• Action 4.5.3 regarding improving bus services between urban centre and regional areas is supported• It is suggested that the focus on transport in the Plan is too heavily skewed towards cars and road transport. Alternative modes should be adequately considered. State Government is well placed to address transport matters that occur across local government boundaries. Such matters are inextricably linked to land use planning and therefore should be considered in the Plan.