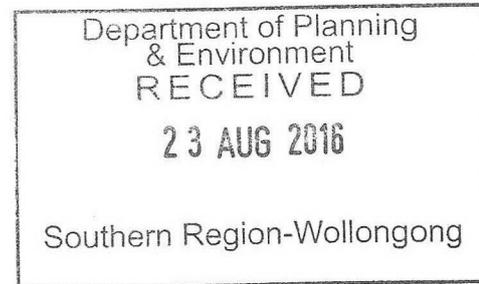




SF140762
C1683576

17 August 2016

Hon. Mr R Stokes MP
Minister for Planning
PO Box 5475
WOLLONGONG NSW 2520



Dear Minister

Thank you for the opportunity to comment on the draft South East and Tablelands Regional Plan (draft plan). Queanbeyan-Palerang Regional Council (QPRC) wishes to make the following comments in relation to the draft plan.

Plan Delivery

QPRC supports stronger collaboration across government and between stakeholders in order to implement the draft plan. In particular, the establishment of a Coordination and Monitoring Committee (the committee) to oversee the implementation of the draft plan is considered a positive step towards a more coordinated approach to regional planning. It is pleasing that local councils will be represented on the committee by the proposed inclusion of the Joint Organisation of Councils (JO) within the committee structure.

It is QPRCs preference that a General Manager or delegate, from each LGA in the region attends the committee meetings along with a JO representative as opposed to a single regional representative. QPRC is hoping to utilise regular meetings with the JO to facilitate a direct line of communication to the committee. In addition, QPRC would like councils to be consulted with regard to how representation will be determined for the 'outcome specific groups' proposed to advise to the committee on specific issues such as population, housing, economy and employment and natural environment and resources. QPRC suggests 'outcome specific groups' be formed to assist the implementation of the draft plan in relation to regional matters including water supply, freight, transport networks, cross-border land use and infrastructure planning in the Greater Capital sub-region. This mechanism has been used in other regional plans and has proved to be the most effective means of achieving specific outcomes.

It is noted the role of the draft plan is not to make commitments as it relates to the provision of infrastructure, however, QPRC considers it essential that the committee include representatives from service providers in order to facilitate the draft plans broad goal of stronger coordination between infrastructure planning and delivery. QPRC supports a stronger alignment between strategic planning and infrastructure provision, particularly as it relates to identified employment and housing land.

2.

While mostly supportive of the proposed implementation plan, QPRC has concerns about how many of the directions and actions in the draft plan will be implemented in future local planning strategies and LEPs, which the draft plan states will be required by a Ministerial Direction.

QPRC believes the draft plan would be of greater assistance to councils in their role as planning authorities if it included an assessment framework to evaluate future development proposals. While not necessarily advocating for the re-introduction of the Sydney-Canberra Corridor Regional Strategy's 'sustainability criteria', QPRC believes the Department and councils should discuss the development of an assessment framework for inclusion in the final plan. Given many local planning decisions have regional implications, a framework would be beneficial in ensuring local planning strategies and LEPs are consistent with the broad objectives of the draft plan.

QPRC also considers it important that the Department assists councils in implementing the draft plan in local planning strategies and LEPs by ensuring that any changes to applicable legislation, policy and guidelines are consistent with the plan.

QPRC would also like to ensure that the reporting commitments of the Coordination and Monitoring Committee as proposed in the draft plan do not result in councils duplicating their existing reporting commitments nor being unduly onerous.

A strong focus on coordinated infrastructure delivery is welcomed as the growth of each location in this region is heavily contingent on the delivery of suitable infrastructure both within the towns, between the towns and between other areas such as the South Coast, ACT and Queanbeyan. For this reason, QPRC recommends that the NSW Government's suite of state and regional infrastructure, transport and freight strategies be reviewed, to ensure consistency with those of the ACT Government as well as recent Federal Government funding commitments, such as the duplication of the Barton Highway.

Goal 1 – Sustainably manage growth opportunities arising from the ACT

QPRC supports the acknowledgement of the significant influence of the Australian Capital Territory (ACT) on the region and the Greater Capital sub-region in particular.

It is noted that increased collaboration with the ACT Government on a number of regional issues is a major focus of the draft plan. While QPRC supports increased collaboration with the ACT Government on strategic planning and infrastructure provision, it is considered that this position must also be reflected in ACT Government policy. It is proposed that the Department and councils, particularly those in Greater Capital sub-region, work with the ACT Government to encourage formal recognition of this approach in ACT Government policy. Whilst the 2011 ACT and NSW Memorandum of Understanding (MoU) for Regional Collaboration sets the framework for this to occur, ongoing discussion (both formal and informal) with the ACT regarding this matter should be undertaken as the mechanisms for implementing the proposed cross-border infrastructure funding model and cross-border land and housing monitor are developed.

3.

In this regard, it should be noted that QPRC and the ACT Chief Ministers Office have worked together to draft an MoU to enable collaboration on issues such as integrated data collection and sharing and cross border land use and infrastructure planning, including the construction of transport networks (road and rail), utility networks (water, sewer, waste) and renewable energy.

QPRC supports the establishment of a cross-border infrastructure funding model and cross-border land and housing monitor and requests that councils have the opportunity to provide input into these processes.

With regard to the proposed cross-border infrastructure funding model, QPRC supports mechanisms which enable QPRC and the NSW and ACT governments to co-plan and fund shared infrastructure. These may include establishing local or state planning agreements, or facilitating a special purpose vehicle (SPV) between QPRC and the ACT Government/ ICON to design, build and operate shared infrastructure (such as a scaled up Queanbeyan STP).

QPRC also believes the development of a tool for the storage and presentation of land and housing information which can be utilised by relevant ACT, NSW and local government authorities, would be a beneficial for informing strategic planning in the Greater Capital sub-region.

QPRC also supports working with the ACT Government to make travelling to and from Canberra easier and more convenient. This complements the Transport Strategy which QPRC is close to commencing and which amongst other things includes consideration of issues such as:

- Improving public transport links into the ACT,
- Improving cycling links into the ACT,
- Improving pedestrian links into the ACT,
- Planning for new road links to the ACT and NSW from Queanbeyan.

QPRC supports the development of guidelines for local housing strategies and encourages the Department to ensure councils have the opportunity to be involved in this process. QPRC believes councils can assist the Department prepare a set of guidelines. QPRC would support tailored guidelines for each region or sub-region to account for planning issues confronted at a local level. It is suggested that generic principles suitable for large urban environments do not always account for town and village environments. QPRC hopes councils will not have to review recently prepared or endorsed housing strategies or similar such as the *Queanbeyan Residential and Economic Strategy 2031* upon release of these guidelines, rather that they form the basis for the next generation of local housing strategies.

4.

The draft plan suggests that there is sufficient strategic housing land identified (in some cases already zoned) in the Greater Capital sub-region to meet expected population growth to 2036. QPRC suggests that the proposed cross-border land and housing monitor form the basis of a sub-regional strategic land use plan which identifies either specific sites or broader areas for further investigation to determine the suitability of residential or employment generating uses beyond 2036. QPRC believes that by doing this, it will assist the Department and councils to better manage speculative development proposals and undertake long term infrastructure planning. A focus on greater housing choice is positive with opportunities for a range of lot sizes being important.

With regard to the water supply section of the draft plan, it is stated that Yass Dam is the main water storage area for the Yass Valley LGA and the former Palerang LGA. This is not the case as Yass Dam does not provide water to any part of the former Palerang LGA. Bungendore also sources water from alluvial groundwater within the Bungendore Alluvial Groundwater Source while Braidwood sources water from the Shoalhaven River and Captains Flat sources water from the Captains Flat Dam.

The break out text also states that “Bungendore and Braidwood are the two main centres for Palerang, with demand for urban water in these areas close to council’s water entitlement”. This implies that growth in these two towns will be limited by access to drinking water. In the case of Braidwood, this is an incorrect statement. The *Palerang Integrated Water Cycle Management Strategy Issues Paper – Draft* (Hydroscience 2016) contains an assessment of the water needs of Braidwood out to 2044/45. It finds that current annual consumption is approximately 150ML/year, and that demand will rise to approximately 200ML/year in 2044/45. This is well within Council’s licence allocation of 360ML/year. There is, therefore, no water constraint in Braidwood.

In addition, this statement is misleading with respect to Bungendore. The Hydroscience report finds that current annual demand in Bungendore is approximately 300ML/year. Council’s current licence allocation is 472ML/year. Using projected growth level of approximately 5% per annum, annual demand is projected to be approximately 1,250ML/year in 2044/45, with the current licence allocation exceeded in 2023/24. In 2023/24 the projected population would be in the order of 5,200 people. QPRC contends that, although there is insufficient water to cater for all projected growth, capacity to cater for approximately 60% growth in population does not present an impediment to urban infill development in Bungendore. In summary, there is sufficient water available in Bungendore to support growth over the next nine years.

QPRC recognises that the water allocation for Bungendore is insufficient to cater for all projected growth. To ameliorate this, QPRC is currently investigating a number of avenues for securing additional water supply, including the testing of water quality and aquifer characteristics of deeper fractured rock aquifers near Bungendore. QPRC is confident that sufficient water will be secured to projected accommodate growth out to 2044/45.

The Hydroscience report has not yet been made available to state government agencies, but a Project Reference Group will be convened in the coming months which will comprise members from relevant state government agencies including the Department of Planning and the Environment.

5.

In regard to Water Supply in the Greater Capital QPRC is of the view that the Plan should advocate consideration of high level planning (and funding) of integrated water cycle and flood management in Greater Capital. In addition the Plan needs to acknowledge an issue with certainty on impacts of SDLs and licences on water storage and diversion in Greater Capital in regard to water supply.

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

QPRC supports the inclusion of a map illustrating areas of high environmental value lands but suggests that opportunities should be created for all to access a more detailed map such as a hyperlink as a the map is of little value at A4 level.

Creating a consistent approach to protecting important riparian areas in planning and development controls is supported by QPRC. It is suggested that having a GIS approach would make it easier for councils to apply strategy and controls.

QPRC supports undertaking work in relation to Aboriginal cultural heritage but recommends that the NSW Government offer funding to councils in order to facilitate this work. In some cases there may also be a need for the OEHL to act as a convener and/or mediator.

Goal 3 – Strengthen the economic opportunities of the region

QPRC agrees with the comments made under Direction 3.2 Enhance the productivity of primary industries.

QPRC supports the actions in relation to the mapping under Action 3.2.1, however it is suggested that current mapping similar the NSW Department of Primary Industries agricultural classification maps would be extremely useful for undertaking strategic planning in rural areas.

In relation to Action 3.3.1, Implement the NSW Renewable Energy Action Plan to increase renewable energy generation, it is suggested that it would useful for councils if the Departments 2011 Draft Planning Guidelines for wind farms were finalised.

QPRC supports the NSW Government working with the Local Aboriginal Land Councils to identify their land holdings and mapping the constraints of each site (Action 3.5.1). It is suggested that resources are required to assist the Land Councils manage the planning and engineering issues that arise in development.

QPRC acknowledges the significant economic activity associated with Canberra Airport, as well as the important transport function it provides to the Region. Regardless, the Airport’s operations should not compromise the orderly and economic development of land in NSW.

In relation to freight, QPRC notes that Bungendore Road/Macs Reef Road (Regional Road 7607) has not been listed as a strategic transport route in the draft plan. RR7607 is a classified regional road. QPRC strongly advocates for the inclusion of RR7607 on the listed routes to ensure that appropriate forward-planning, design and upgrade of this route occurs as the population of the area increases.

6.

QPRC is an active and committed member of the South East Australian Transport Strategy Inc (SEATS). As such, QPRC (through the former Palerang Council and Queanbeyan City Council) have always taken a strong interest in transport connectivity throughout the south-east of Australia. QPRC is, therefore, very supportive of improved cross-border connections to the ACT and improved transport infrastructure. QPRC considers that the economic strength of the LGA (particularly Bungendore and Braidwood), the NSW South Coast and the ACT can be greatly enhanced by improved transport connections in the region.

Over the last fifteen years, traffic volumes on the RR7607 corridor have grown significantly. Traffic volumes have been driven by the following circumstances:

- Significant population growth in Bungendore and the Wamboin/Bywong area – in 2001, the resident population of Bungendore was 1,562. In comparison, the population in Bungendore in 2011 was 2,754 and is now estimated to be approximately 3,200. Growth in Wamboin/Bywong, while not as strong has still been significant, with the population rising from 2,775 in 2001 to 3,703 in 2011. (profile.id.com.au/Palerang),
- High employment outside the former Palerang LGA – approximately 60% of residents working in either the ACT or other nearby NSW towns with the vast majority of these working in the ACT,
- High seasonal traffic volumes – RR7607 forms the shortest route from the northern area of the ACT to the South Coast. The appeal of the South Coast for many residents of the ACT (and the broader southern NSW region), coupled with strong population growth in the ACT means that large traffic volumes are experienced on RR7607 during holiday periods,
- Opening of the Headquarters Joint Operations Command – the most efficient route for employees based at the facility from the northern portions of the ACT is via RR7607.

As a result of these factors, traffic volumes have grown from 2,600 vehicles per day (average daily traffic (ADT)) in 2003 to 4,000 vehicles per day (ADT) in 2015.

In addition to this, this route has the following issues:

- Poor safety performance, the transport route experiences high traffic accident rates,
- Limited overtaking opportunities, causing driver frustration and increased risk taking,
- An inappropriate intersection with the Federal Highway, the at-grade intersection is a safety issue and also leads to traffic delays during peak periods. The intersection is frequently affected by fog during winter months further exacerbating the problem,
- 10T load-limit – improvements to the pavement and bridge structures along the route would enhance economic opportunities in the area.

As demonstrated above, RR7607 is an important road in the regional context, and should therefore be included in the list to ensure that suitable upgrades are undertaken in a timely fashion to support the growth of the region.

7.

QPRC, in conjunction with a number of regional LGAs and under the auspices of SEATS, delivered the *Beyond Nerriga Route Options Study – Corridor Options Report* (GHD 2014). The study found that there was a viable heavy vehicle transport corridor linking the NSW South Coast and Illawarra regions. This route utilises Bungendore Road, as such, Bungendore Road is considered by QPRC to be an important strategic link road for both cross-border transport and wider NSW and National transport priorities.

Construction of this heavy vehicle transport corridor would require substantial road safety and pavement improvements. Bungendore Road north of Macs Reef Road has flatter gradients, superior horizontal alignment and reduced construction/upgrade costs when compared to the Macs Reef Road segment of RR7607.

RR7607 should be changed to comprise Bungendore Road only between Bungendore and the Federal Highway (i.e. continue along Bungendore Road north of the intersection with Macs Reef Road rather than turning onto Macs Reef Road). This change should only occur once this section of Bungendore Road has been upgraded to current design standards.

A number of other transport issues should be addressed in more detail in the Regional Plan. These include:

- Improved and increased train services to better serve the population of Bungendore and improve connectivity to Queanbeyan, the ACT, Goulburn, Southern Highlands and Sydney. NSW TrainLink provides three northbound and three southbound daily train services between Canberra and Sydney, stopping at Goulburn and Bungendore. The service takes approximately 45 minutes to reach Canberra and 50 minutes to Goulburn. The current arrival and departure times are not suitable for commuters,
- Improved and increased public transport services providing direct connections to ACT attractors such as hospitals, shopping centres and schools. A number of buses depart Bungendore and Braidwood for schools in Queanbeyan, Braidwood and the ACT. Some of these buses are required to drop students at bus interchanges to comply with cross-border differences in regulations,
- Improved road transport corridors to facilitate greater economic activity, improved social connections and enhanced road safety. Given the dependence of Bungendore and Braidwood on neighbouring major centres for employment and commercial needs, maintenance of a high quality, safe and efficient access network is critical. In addition to servicing the needs of residents, major access roads also serve to bring visitors to Bungendore and Braidwood and as a route to the NSW South Coast.
- Upgrade of Main Road 92 (Nerriga Road) including the sealing of the current 16.5 km (approximate) unsealed section and other necessary works as outlined in the “Route beyond Nerriga” report. As this is a classified road upgrading will have a number of important benefits including directly connecting the Princes Highway and Kings Highway and providing a HML and B-Double route between the ACT, south-western NSW and the NSW South Coast. Other benefits include providing a route more suitable to cater for the increasing traffic volumes between the Coast and Inland, as well as improving road safety on a road which has a substantial crash history. Local benefits include reducing a significant road maintenance burden for QPRC.

8.

QPRC also wishes the Department and the Plan to note that the ACT Government and QPRC are sharing freight and commuter traffic data to assist the preparation of an integrated cross border Transport Strategy.

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

QPRC supports Direction 4.1.2, which will require future rural residential development to be informed by a comprehensive housing strategy. QPRC considers this initiative will assist the Department and councils to better manage speculative proposals. It is also considered that the implementation of new mapping for highly suitable agricultural land and high environmental value land will assist councils and the Department to assess the suitability of proposals for new rural residential development.

QPRC supports asset planning for schools in the region and hopes the coordination and monitoring committee will facilitate a discussion with NSW Department of Education and Communities regarding the requirements for triggering the establishment of state schools, particularly in town and village communities.

It is suggested that in addition to actions relating to education and health there needs to be consideration for the provision of emergency services and associated infrastructure and aged care.

Other matters

It is acknowledged that the draft plan was released prior to the local government amalgamations. QPRC staff have been assured by Department staff that the draft plan will be amended to reflect changes arising from the amalgamations.

It is suggested that it would be useful if the Department met regularly with the planning and engineering staff from councils to discuss policy, issues, data and work in relation to the plan's actions. A regional planners group has recently been established with the assistance of the JO and it is thought that the proposed quarterly monthly meetings of this group would be a suitable means of facilitating this.

If you wish to discuss this submission please contact John Wright, Director Planning and Environmental on 6238 8111 or David Carswell, Executive Manager Strategic Land Use Planning on 6285 6128.

Yours sincerely



Peter Tegart
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Queanbeyan-Palerang Regional Council

CC Administrator
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