

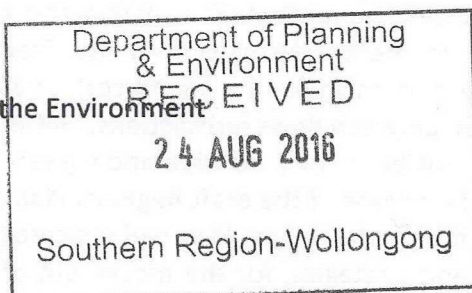


SNOWY MONARO  
REGIONAL COUNCIL

Stronger together better together

23 August 2016

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



Dear Sir/Madam

**RE: DRAFT SOUTH EAST AND TABLELANDS REGIONAL PLAN**

Snowy Monaro Regional Council (SMRC) commends the NSW Department of Planning for its work thus far preparing the South East and Tablelands Regional Plan. Historically a defined region has not been fully articulated in state policy in the south-east of New South Wales. SMRC is pleased to now be a part of a coherent region centred on Canberra, and further with the development of this Regional Plan. SMRC thanks the Department for the consultation provided though the development of the Regional Plan and the opportunity to make comment at this stage.

**Introduction**

SMRC notes that the draft Regional Plan Introduction establishes five 'regional landscapes', those being Greater Capital, Hilltops, Alpine, Southern Highlands and Tablelands and the Far South Coast. SMRC is involved in the activities of the Canberra Region Joint Organisation (CBRJO), which has produced a similar concept to distinguish different parts of the broader region. The subregions prescribed by the CBRJO are City, Coast, Alpine and Tablelands. These are broadly comparable to the landscape divisions put forward by the draft Regional Plan, with the omission of the Southern Highlands/Wingecarribee Shire. Notably, within the CBRJO subregional divisions, Goulburn and the 'Greater Capital' local government areas (as prescribed in the draft Regional Plan) are located within an enlarged 'Tablelands'. This is not of direct concern to SMRC, but some harmonisation negotiated between the Regional Plan and CBRJO subregions concept may be beneficial, particularly if the CBRJO is to be involved in the ongoing implementation of objectives within the Regional Plan. Some variation may be possible without great dislocation of planning objectives as specific mention of the regional landscapes as a planning device does not appear within later Directions and Actions of the draft Regional Plan.

**Goal 1 – sustainably manage growth opportunities arising from the ACT**

A key aspect of the plan which SMRC is highly supportive of is the renewed focus on the region's relationship to the Australian Capital Territory and the opportunities that arise from this. The

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involvement of the CBRJO in the implementation of the plan in view of this is sound. SMRC particularly notes the inclusion of the first of four goals of the Regional Plan; "Sustainably manage growth opportunities arising from the ACT". Within this goal, Key Directions of the Regional Plan relate specifically to the uptake of land in the Greater Capital area to satisfy continued residential demand and planning for the sound connectivity between ACT and NSW transport systems at the interface between these jurisdictions. SMRC staff were pleased to hear during the briefing that there will be further consideration given to cross-border transport planning in particular between the release of the draft Regional Plan and the final version of the Regional Plan. Prior reading of the draft Regional Plan had indicated a lack of specific mention given to ACT transport policies and strategies, for the movement of both persons and freight. SMRC would encourage the Department to focus on this particularly following the exhibition period. The ACT's prevailing direction with respect to transport planning will be a key consideration for both future land release and transport planning in the Greater Capital area – and a smaller portion of the Alpine area to the south, within SMRC's jurisdiction. SMRC submits that Actions 1.1.1 through 1.1.4 may be supported through local planning and infrastructural works to areas within the north of SMRC, including the Royalla-Michelago-Bredbo area. These locations are well positioned for access to employment lands located in the east of the ACT. SMRC would appreciate this being noted within Actions at Direction 1.1. Extending those Actions to the southern approach to the ACT where necessary would enable sound assessment of and planning for the development potential of that portion of SMRC.

SMRC notes the emphasis placed upon key pieces of infrastructure in the region, in particular Canberra International Airport and the redeveloped Port of Eden. This is strongly supported. The development of these key assets will be of great economic and social benefit to the community in the region. SMRC suggests inclusion of further discussion of the implications of those assets, particularly for strategic links between these two facilities that traverse the SMRC area. The opportunity exists for the Regional Plan to identify the need to enhance transport links between these two strategic assets. The economic opportunities to be leveraged from these assets throughout the region are considerable. Incremental enhancements to other supporting infrastructure like roads and rail will allow the region to derive further benefit from these facilities – an effective broadening of the influence of these key assets. SMRC suggests continued improvements to the road network south of the ACT – towards both the Kosciuszko National Park/alpine resorts and Eden port – would be a worthy objective. This would enhance both safety and efficiency for both freight and travellers to and from the core Canberra/Greater Capital area. As examples, it can be reasonably anticipated that continued population growth in Canberra/Greater Capital will drive recreational visitation to the Snowy Mountains. Development of the Canberra Airport will multiply opportunities for rural product – or indeed new industrial or manufacturing product – from SMRC to be exported. These highly valuable practices would benefit from enhancements to less glamorous underpinning infrastructure, in this case the Monaro Highway. Further points related to this are discussed at Goal 3.

The Regional Plan exhibits something of a dependence on the further development of the road network in the region to deliver growth. The plan should include (possibly under Direction 1.2) direction for the preservation of the Queanbeyan-Bombala railway corridor to allow consideration and planning for progressive reinstatement in future years. This would be consistent with a later part of the draft Regional Plan, Action 4.5.2, which seeks to preserve land for Sydney-Melbourne high speed rail. This development, if pursued, would undeniably change the transport mix of the region. Taking a long-term view, opportunities would then exist for linking rail infrastructure in other parts of the region, as per the incremental approach discussed above. In future, a functional Queanbeyan-Bombala rail line could achieve economic benefit



derived from linking key infrastructure in Canberra and Eden, supporting sustainable settlement by further reinforcing the urban core of Canberra and the Greater Capital as an anchor for regional networks and also relieve or redirect some development and infrastructure pressure currently existing within other parts of the region. The opportunities associated with the Queanbeyan-Bombala rail corridor should be retained and protected for successive Regional Plans to advance over coming years.

Suggested amendments and inclusions:

- Include reference to areas along the Canberra-Cooma corridor within Actions 1.1.1 through 1.1.4 as able and appropriate, including settlements of Michelago and Bredbo.
- Include an Action to preserve existing infrastructure with future potential for utilisation, in the case of SMRC the Queanbeyan-Bombala railway corridor, within Direction 1.2.
- Give mention to specific ACT transport policies and strategies at Direction 1.2.

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

SMRC is broadly supportive of Directions and Actions included within Goal 2. This is particularly the case with respect to Action 2.1.3 to support the development of the Koala Plan of Management and ongoing monitoring of the local koala population, which SMRC strongly supports. Other Actions are also sound. Action 2.2.1 to “Focus urban growth on the Far South Coast in existing urban growth areas” is sound not only from an environmental perspective, but also to provide orderly planning which supports good outcomes for urban economic activity, social planning and transport. This is an Action (and principle) which SMRC would generally support being implemented at a whole-of-region scale – not only for the Far South Coast – and particularly in areas of high development pressure.

SMRC suggests that Goal 2 risks being – or appearing to be – overly concerned with the Far South Coast at the expense of other parts of the region. Within the South-East and Tablelands Region there exist nationally unique and scarce alpine environments. SMRC suggests that the draft Regional Plan does not place a level of emphasis on this environment which is proportionate to its level of significance. This is particularly apparent given the relative emphasis placed on the Far South Coast environment through the inclusion of Direction 2.2. The alpine environment is also vulnerable to climate change, a problem discussed at Direction 2.3. A substantial part of the SMRC economy is also dependent upon the good health of these alpine environments, including snow sport, recreation and nature-based visitation. Contingencies for climate change in SMRC – including opening the economy to year-round visitation – are partly dependent on planning practices at the state level. This includes the approach to seeking and assessing new development proposals within the bounds of National Parks. There may be benefit for the Regional Plan to include an undertaking to evaluate the methodology of other Australian states, including Tasmania, in managing these issues.

SMRC suggests that the ongoing success of the region in the economic, social and cultural realms – as pursued through Goals 1, 3 and 4 – is contingent upon more than the support given to a specific set of discrete environmental assets at Goal 2, but also to other less tangible environmental features. Within Goal 2, listed Directions and Actions focus most closely upon discrete environmental assets including habitat areas, biodiversity corridors, estuaries and riparian areas. An example is the aforementioned Action 2.1.3 to support the development of the Koala Plan of Management and ongoing monitoring of that koala population. SMRC

considers scenic landscape values to be of high importance to the visitor experience and subsequent economic effects of visitation, but also as contributing towards the lifestyle aesthetic which enables population growth and the social identity of the SMRC area. The scenic values of landscapes featured throughout the South East and Tablelands Region do not attract similar emphasis to discrete assets within the Regional Plan. Notably, Direction 2.2 mentions “spectacular coastal scenery” – again in reference to the Far South Coast – but does not specifically address the protection of these scenic (rather than functional environmental) values at any of the supporting actions.

A particular example of these values within the SMRC area are ridgelines within the alpine ranges context and scenic landscape values along the Canberra-Cooma corridor. Previously, the former Snowy River Shire Council saw fit to disallow development along ridgelines through its LEP. Similarly, the Cooma-Monaro LEP presently includes a scenic protection area along the Monaro highway. The high importance attached to scenic landscape values in the Alpine area is borne out by the presence of these numerous provisions within environmental planning instruments of the region, both active and historic. The Regional Plan should include some recognition of the need to protect regionally important landscapes, also including those along sections of the Monaro and Snowy Mountains Highways. The Regional Plan should include provision for planning authorities to be supported in undertaking strategic, landscape-scale assessment of visual amenity and identification of sensitive, high-value landscapes. The Regional Plan should require that local government and development proponents protect high-value visual landscapes (as identified through local strategic planning) in rezoning decisions. Inclusion of this intent in the Regional Plan would provide an excellent further opportunity for the Regional Plan to demonstrate synergies between sound environmental stewardship and economic opportunities, as at the discussed example of Action 2.2.1. Unfortunately these can often be viewed as competing interests and the Regional Plan should provide a convincing illustration to the contrary.

Suggested amendments and inclusions:

- Note the significance of the alpine environment located in the region, and the need to protect this environment, particularly from the effects of climate change. Include content to this effect at Direction 2.3.
- Include additional action to Direction 2.1 to protect scenic landscape values. Include a commitment to support local strategic planning in conducting studies of landscape-scale visual amenity and devising a sound method for governing the preservation of these values within Environmental Planning Instruments.

**Goal 3 – Strengthen the economic opportunities of the region**

SMRC encourages the prominence given to supporting economic activity and tourism visitation within the draft Regional Plan. It is noted that key tourism assets have been specifically mentioned within the draft, with Directions 3.1 and 3.4 containing Actions which support these. SMRC notes particularly the consideration given to marine-based tourism at Action 3.1.2, where small ocean ports of the Far South Coast area are to be leveraged to support this industry. SMRC suggests that opportunities for marine-based tourism also exist within the context of the constructed inland lakes within the Alpine area. Action 3.1.2 could be broadened to include recognition of this.



SMRC also believes that the Regional Plan would benefit from the inclusion of an infrastructure appendix to list specific supporting infrastructure outcomes that will deliver upon the objectives of the Regional Plan. Fundamentally, economic development requires infrastructure planning and delivery. The effectiveness of the Regional Plan will be substantially undermined if there is no direction for investment. To achieve outcomes at Direction 3.1, tangible improvements are required. SMRC proposes an additional Action for the delivery of key 'second tier' infrastructure to be inserted under Direction 3.4. Such an action could contain or reference a regional infrastructure prospectus, which may include projects discussed in this submission like improvements to the Monaro Highway and Imlay Road. This Action should be pursued to support the central regional strategic assets, to ensure that the greatest economic potential is derived from these assets. SMRC particularly notes the Imlay Road corridor as the most viable option for access to inland areas from Eden for road freight transport within the southern extent of the South East and Tablelands region. Alternative routes inland are unreliable and are likely impractical to upgrade significantly.

Action 3.1.1 seeks to 'Improve tourism related transport services'. The prescribed method within the Regional Plan includes *branding* public transport services, raising awareness of travel options through *brochures and websites* – these measures will prove wholly insufficient to the task in SMRC's opinion. Lastly, Action 3.1.1 suggests providing *seasonal* transport options – a suggestion which appears to both neglect and pre-empt the necessary strategic transport planning work to identify which transport options should be made available in which locations and in what manner. More advantageous contributions would be ongoing improvement to the capacity and safety of major routes and open collaboration with local government to work towards increased provision of the aforementioned public transport options where they do not currently exist.

SMRC would seek to alert the Regional Plan authors that there is potential conflict within the Plan arising from interplay between Directions 2.1 and 3.3. Important biodiversity areas are also areas where potential sources of minerals are located. Of particular relevance to the SMRC area, this occurs in areas between Cooma and Queanbeyan. There is limited capacity for local strategic planning to address these issues, as *State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007* is the environmental planning instrument of precedence in such development scenarios. Clauses 7 and 8 of *SEPP (Mining, Petroleum Production and Extractive Industries) 2007* are particular examples to note in this regard. Also present are examples of environmental objectives which are obstructed by legislation (as opposed to environmental planning instruments). A key example in this regard is the unplanned development of plantation forestry under the provisions of the Plantations and Reafforestation Act, which undermines environmental initiatives in the draft Regional Plan. Genuine solutions to some issues discussed in the Regional Plan sit beyond its influence. The Regional Plan should convey a clear recognition of this fact.

Other land use planning issues that are discussed within the draft Regional Plan will also require improvement of the provisions of the Standard Instrument LEP. This should occur continually over time and in response to changing demands upon the planning system. SMRC contends that this is particularly relevant to the pursuit of objectives identified within the draft Regional Plan, including Directions 3.1 and 3.2. The Standard Instrument LEP requires ongoing improvement to definitions (and placement of definitions within Land Use Tables and group terms). This will allow place-appropriate development which value-adds and genuinely supports tourism visitation and economic activity. The constituent former shires of SMRC have encountered issues in assessment of otherwise commendable and broadly positive development proposals,

for example breweries or microbreweries in the rural context. Such developments are not easily placed within currently permissible land use definitions to the rural zones – for example the comparable but highly specific example of a *cellar door*. A further example is the definition of *eco-tourist facilities*. In the experience of SMRC, the definition lacks the required rigour to ensure the environmentally-aware design response and sufficiently credentialed tourism operation that the term *eco-tourist facilities* might otherwise imply. The geographic application of this definition can also be too broad. This may arise from the multiple Standard Instrument zones this use is permitted within. This can result in '*eco-tourist facilities*' being developed in locations of dubious environmental significance. This can also result in land use conflict similar to that addressed later at Action 4.1.2 between rural residential use and agricultural use or environmental values. *Eco-tourist facilities* can in some cases introduce conflict with *all* of these interests.

As in these examples, ongoing improvement to the Standard Instrument is of central importance, to both avoid unnecessary constraints to the introduction of compatible value-adding industries within the high-value agricultural setting, and to the protection of these and environmental assets from non-compatible use. Compatible industries can enable valuable flow-on effects to other economic sectors, including tourism. The potential exists for new industry to take advantage of developments at both Canberra Airport and the Port of Eden. This includes existing tourism and agriculture, but also possibilities for value-adding processing or manufacturing. The Regional Plan must acknowledge that the Standard Instrument LEP requires ongoing improvement to allow enough flexibility for these positive outcomes, whilst enabling effective management of land-use conflicts.

#### Suggested amendments and inclusions:

- Include inland lakes as well as small ports at Action 3.1.2, and support for implementation of smaller examples of boating infrastructure at lakeshore locations.
- Include specific reference as to whether the Integrated Mining Policy, Strategic Release Framework or other state policy discussed at Direction 3.3 will address the implications of SEPP (Mining, Petroleum Production and Extractive Industries) 2007 and the resultant inability to uphold parts of Direction 2.1 of the Regional Plan through local planning in some cases.
- Note the significance of the Standard Instrument in obtaining many of the desired outcomes of the Regional Plan and include a commitment to continual enhancement – including consultation of local government in the region – of the provisions of the Standard Instrument.

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

Discussions with Department of Planning staff during consultation raised the issue of the emphasis that should or should not be placed upon the population projections underlying the planning contained within the draft Regional Plan. SMRC prefers to avoid having population projections espoused within the Regional Plan in such a way that these projections become self-fulfilling over the lifespan of the Regional Plan. From SMRC's perspective, it would be ideal that projections are only a tool for developing the Regional Plan and are not seen to be endorsed or otherwise targeted. In SMRC's case, growth is principally occurring in and around a few key centres within the LGA. The Regional Plan should communicate that in parts of the region the challenge is not to manage growth but rather to facilitate growth.



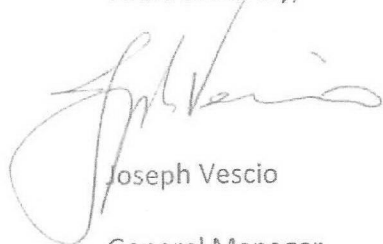
The demographic indicators provided at Figure 9 do not have adequate corroborating detail to explain why these indicators are significant and why these particular datasets are referenced. For example, dwelling occupation rates are referenced for the Alpine region but not elsewhere. Local planners may understand the influence of high visitation levels on this, but others may not. Further, it is unclear how the Regional Plan intends to treat this issue having seen fit to raise it – is this situation undesirable or encouraged? Which of the Actions elaborates on the response to this particular issue? By contrast, the issue of an ageing population is one which Figure 9 identifies for the entirety of the region and which is managed or improved by Directions and Actions of Goal 4.

SMRC notes the inclusion of the Regional Centres Hierarchy within Direction 4.3 of the draft Regional Plan. SMRC has some concerns to express regarding Direction 4.3 and Action 4.3.1. It is noted that Action 4.3.1 states: “the centres hierarchy will inform policy development, land use strategies, infrastructure delivery and local environmental plans.” SMRC is geographically quite distant from the nearest nominated centres of Queanbeyan and Bega. In light of this, SMRC would prefer to avoid a state policy-led exit of service provision in the Monaro region, with a gap in service provision between Queanbeyan and the Far South Coast. This is of particular importance given the intensity and peculiarity of seasonal change generated by visitor demand for winter snow experiences, with Cooma providing the central focus of core service provision at the present time. SMRC suggests that Cooma should be included as a Regional Centre within the Regional Plan. SMRC would put that Cooma is at least as significant as Bega in this regard, given the range of agencies and services located within the town. These include SMRC head office, NSW Health Cooma hospital, Service NSW, Local Land Services, Roads and Maritime Service depot, Country Energy depot, Cooma Correctional Centre and multiple educational providers including Cooma Universities Centre, TAFE and several schools. Such inclusion should also be indicated within Figure 8.

Suggested amendments and inclusions:

- Include Cooma within the Regional Centres hierarchy at Direction 4.3. Modify Figure 8 accordingly. This would account for current levels of service provision required, the relative geographic isolation from other listed Regional Centres and the large fluctuations in population experienced from visitation and itinerant worker inflow.
- Provide consistent demographic indicators to Figure 9. Where trends or figures are deemed significant enough to warrant inclusion in Figure 9, Regional Plan Actions should seek to address these with more specific reference. Place less emphasis upon population projections, perhaps by referring to ‘current rate of growth to 2036’.

Yours sincerely,



Joseph Vescio

General Manager  
Snowy Monaro Regional Council