



BRAIDWOOD COMMUNITY ASSOCIATION

BCA Submission on the draft Braidwood Structure Plan

The BCA welcomes the opportunity to comment on the draft Braidwood Structure Plan (the draft Plan). The BCA has been engaged in the consultation process since the outset. In particular, it made an extensive submission on the Braidwood Structure Plan discussion paper (see Attachment 1).

The BCA would like to thank the planning staff who attended the BCA's Open Meeting on 18 February and provided a briefing on the draft Plan and answered residents' questions.

Given the complexities of the issues relating to the Structure Plan, the BCA appreciates the extension to the exhibition period.

Summary

The Plan is an important component in developing an overall strategic plan for Braidwood. Other important elements include the Braidwood Community Plan (complete) and the implementation of the 15 Year Review of Braidwood's Heritage Listing key recommendations (including the development of the Braidwood Heritage Interpretation Plan and a revised Development Control Plan).

The BCA believes that

- Planning for Braidwood's future should ensure that different types of residential opportunities are available to cater for different demographics, incomes and lifestyles.
- Rezoning and release of land outside the existing town boundaries must preserve the unique qualities of the historic township and its rural setting,
- Planning for expansion of the town must consider the constraints of the town's water supply and sewerage system.
- There must be provision for land to be set aside in new developments for the services and infrastructure required to cater for an increased population. This would include educational facilities (including preschool and childcare facilities), green spaces and provision for active and passive recreation.
- Transport routes to and from the existing town to new developments should be provided before new development takes place.

The BCA's main comments on the substance of the proposed rezoning of land are as follows:

- Area 1 Station Street: The BCA believes this to be the obvious choice for future R2 development once most of the existing R2 zoned land has been exhausted. It believes that there should be a buffer zone between new developments and the Kings Highway, so you would not see the housing as you come into town. The BCA suggests that consideration should be given to including land on the west side of Hoggs Lane in this area. Development here is likely to lead to access issues to the town centre. The BCA believes that serious consideration should be given to alternative access avoiding the Kings Highway with new bridges across the creek at Ryrie Street and/or Boppings Crossing. This would require the preparation of additional S.94 plans.
- Area 2. South of Glenmore Road: The BCA opposes the proposed zoning change from C4 to R2 residential development. The area contains an important riparian zone along Monkittee Creek, a well-known platypus habitat, and currently provides a rural landscape

outlook from the town. Land next to Monkittee Creek could form part of a passive recreational area with a pedestrian pathway around the north-western side of the town. A safer pedestrian crossing could be incorporated into the local traffic crossing proposed above for the bottom of Ryrie St.

- Area 3. Glenmore Road and Boppings Crossing Road: The BCA believes that this area could be rezoned R5, but only until Boppings Crossing Road (eastern side). The remainder of the proposed area could remain as currently zoned. This will depend on demand for R5 zoned land. Much of this demand is constrained by the unwillingness of current owners to sell or subdivide. This area would provide additional supply and diversity of R5 zoned land. Importantly this land can become available relatively quickly as it does not require the provision of water and sewer services. A landscape scale firebreak between Bombay Road and Glenmore Road to the west of Hoggs Lane could be incorporated into such a rezoning. This would provide strategic protection of the town and could also be used as part of pedestrian and cycling network.
- Area 4. Council Depot: The BCA agrees with the recommendation to re-zone to R1 and supports the relocation of the Council depot as soon as feasible. This is an ideal location for medium density affordable housing to be situated in the town centre.
- Area 5. Lascelles Street: The BCA agrees with the recommendation to re-zone to R1. The BCA notes that as vacant Crown Land this area has an outstanding Land Claim. Therefore, the proposed short-term timing appears optimistic.
- Area 6. Elrington Street: The BCA agrees with the recommendation to re-zone to R1.
- Area 7. Existing C4 Areas: The BCA agrees with the recommendation to re-zone from C4 to R5.
- Area 8. Sandholes Road, Saleyards Lane and Gillamatong Lane: Feedback from residents indicates that the view of Mount Gillamatong, from all aspects both within and outside the town, is important and highly valued. The BCA is opposed to any development in sight lines of Mount Gillamatong from roads into Braidwood and from within the town itself. There is a need to keep any development as low in the vista as possible, to preserve the view-cones and the iconic status of this landmark. This area is outside the NSW SHL Heritage Curtilage, but the views of the slopes of Mt Gillamatong form a major part of the ‘*delightful views to the pastoral surrounds*’ referred to in that listing.
- Area 9. Future Industrial Bombay and Sandholes Roads: The BCA submits that the terrain of this area would make development difficult, as much of the land is very uneven, with a water course and many granite outcrops. The land is part of a larger rural holding used for agricultural production. The BCA sees no need for two separate areas of Industrial land until demand is there to justify it.
- The BCA agrees that the Plan should be able to adapt to changing circumstances and looks forward to seeing the full Implementation and Monitoring Framework in the final Plan (p37). The BCA would like the annual monitoring results and any conclusions arising from these results to be made public.
- Council staff propose to ‘*Continue to advocate with Transport for NSW for a future bypass route around Braidwood*’ (p37). The BCA believes this action is inadequate. Given the realistically long time frame the BCA feels that there should be an increased focus on relieving internal congestion for residents by providing additional crossings of creeks at the bottom of Ryrie St and Bopping’s Crossing. These crossings would not only relieve

pressure on the dangerous Jews Bridge bottleneck (Wallace and Solus St) but also facilitate safer pedestrian and cycle access.

- The BCA believes that for Staging and Sequencing (p38), when the time is right, the first areas to be re-zoned should be: Area 1, including land to the west of Hoggs Lane, to R2 and consideration of new local access bridges; Area 3 to R5; Areas 6, 4, and 5 to R1.
- Council staff indicated at the BCA Open meeting on Feb 18th that there would be further public consultation after Council has had feedback from other relevant NSW Government agencies. The BCA would welcome this opportunity, and appreciates the iterative process proposed.

In its detailed comments, the BCA makes a range of comments on the draft Plan, which it would like to see addressed by Council staff when they give their response to the public consultation.

Detailed Comments on the Plan

Overview

The BCA notes that *‘the plan has been prepared to ensure that there is adequate supply to meet community’s needs for the next 20 years’* The BCA endorses this overall goal.

The BCA is pleased to see the Plan use a wider range of assumptions on population growth than used in the 2023 Discussion Paper.

Objectives

The BCA agrees in principle with the Objectives (p7) but makes the following comments.

- The BCA notes that the overall objective of the Plan is *“to guide the future development and use of land within the main township of Braidwood for the next 20 years and beyond”* (p7). The BCA notes that the proposed new development areas are largely located outside the main township of Braidwood. It is suggested that this objective needs to be modified to read *“to guide the future development and use of land for the township of Braidwood...”*.
- The proposed time frame of “20 years and beyond” is very vague. How far is ‘beyond’?
- Re Heritage and Cultural features, the BCA believes that the objectives miss a key consideration for the residents of Braidwood which goes beyond just *‘maintaining heritage features’* (third objective). Residents want to retain the essence of Braidwood, which not only includes the character of the heritage listed area, but also the aesthetic and historical values of the town’s setting within a rural landscape.

This is acknowledged and celebrated in the State Heritage Listing (SHL) of Braidwood and its Setting. The Statement of Significance for the listing states:

“... The high proportion of 19th century buildings throughout the town contributes further to its heritage value and creates fine streetscapes often with delightful views to the surrounds.

The abrupt transition at the town boundary between built and pastoral landscapes highlights significant historical settlement patterns ..., The juxtaposition of a cohesive town set within an historic pastoral landscape on the north, east and south sides is also significant. ...”

The BCA believes that the significant rural landscape outside the existing town boundaries should extend to the west beyond the SHL listed curtilage areas and approach road setback zones.

The BCA believes that the visual town boundary to the west, incorporating the significant views from the town of the undeveloped slopes below Mt Gillamatong, should be preserved. Mt

Gillamatong has great historical and cultural significance for local residents, as a landmark and symbol of the town. The BCA opposes any development on the lower slopes of Mt Gillamatong, which are clearly visible from both the town and the main approaches to the town.

The BCA therefore proposes the third bullet point is extended to read:

- *“Facilitate growth while maintaining the heritage features and the unique character of a town set within a rural landscape”*

Braidwood’s Role in the Region

This provides a good concise summary of Braidwood’s role. The BCA suggests that the reference to Braidwood’s heritage listing in the section on Braidwood’s Role in the Region which states ‘*Braidwood is now a State heritage listed town*’ should be extended to include ‘*the only one in NSW*’.

Braidwood’s Vision Statement

No comments

Guiding Principles

The BCA agrees with the Plan’s guiding principles.

Policy Documents which Legislate and Inform the Structure Plan

No comments

Who are we planning for?

The future population growth is crucial in determining when land needs to be rezoned.

There is some uncertainty around the projections as the last census results were most likely adversely impacted by the Covid restrictions in place at the time¹. On the other hand, the closure of the Dargues gold mine in 2024 has had a negative impact on the Braidwood population. The next Census in 2026 will provide a better guide to what is actually happening with population growth.

As stated above the BCA endorses using a wider range of assumptions on population growth than used in the discussion paper. It notes that under the high assumption Braidwood’s population would double by 2041. This would not be easy to manage and could affect the current character of the town.

The site analysis graph (p17) is a nice way to present the future challenges. This is based on the average growth rate of 2.55% pa (note: this not the ‘median’ as used in the text of the graph. The median is 2.56%). However, there appears to be some inconsistencies in the illustrative data given. The BCA would therefore like to see the detailed workings on an annual basis in a spreadsheet.

It is interesting that the projections assume the working age population will grow faster than the retirement age population.

It is understood from the BCA Open meeting on 18 February that these comes from the NSW Population and Profile ID Projections. The BCA does not know if these demographic profiles are based on actual projections for Braidwood or on projections for NSW or QPRC which are then applied to Braidwood, but suspects the latter is more likely given the small size of Braidwood.

¹ eg Most Airbnb properties were likely to have been vacant at that time due to the movement restrictions understating the population for Braidwood.

The BCA is querying this, because this has not been the case in recent years as shown by the 2011, 2016 and 2021 Census results below:

Change in Braidwood's population 2011-2021								
	2011		2016		2021		2016 on 2011 % change	2021 on 2016 % change
	Number	%	Number	%	Number	%		
Under working age (0-19 yo)	372	25%	390	24%	342	20%	5%	-12%
Working Age (20-64 yo)	794	53%	833	51%	873	51%	5%	5%
Retirement Age (65 - yo)	334	22%	401	25%	507	29%	20%	26%
Total	1,500	100%	1,624	100%	1,722	100%	8%	6%

Source: Australian Bureau of Statistics, Census of Population and Housing, 2011, 2016 and 2021. Compiled and presented by .id (informed decisions).
<https://www.id.com.au>

Given the population projections do not reflect the past growth rates of different demographic groups, the BCA believes Council staff should revisit their analysis, as this will be important in determining the type and mix of dwellings needed.

The conclusion that around 611 new dwellings will be required (or 22 dwellings per year), requiring 40ha of greenfield land to accommodate this growth is quite sobering. Council staff at the BCA open meeting noted that demand for new residential land has slowed recently across the LGA. These predictions should be seen as optimistic, and further research is required based on actual demand over time.

The BCA believes that there needs to be a mix of different housing types in Braidwood and new growth areas to cater for each demographic group, noting that lone person households are the dominant type (31.9%²). In particular, the BCA believes that affordable medium density housing is an essential component of future housing development in R1 and R2 zoned areas. Dual occupancy development on suitable R2 zoned land should be encouraged and facilitated. This would allow existing residents to downsize to a more affordable and suitable home for their retirement years and would also cater for essential services personnel who do not need a traditional home on a large town block. See comments below on existing land supply and demand

Existing Land supply and demand (p18)

Residential Land: The BCA notes that in the Note on p18, it is stated that “*Many owners of R2 zoned properties in Braidwood purchased their property specifically due to a larger lot size and the heritage characteristics of the dwelling/neighbourhood; they have no interest in further development of the property.*” This appears to be an assumption with no supporting evidence provided. As nearly all properties within Braidwood are currently zoned R2, new property owners had no choice about the size of the property they purchased. There has been a significant increase in the number of infill developments within the town in recent years, where larger lots have been subdivided, or secondary dwellings have been built. This indicates a demand for smaller lots and smaller homes, and an interest in dual occupancy development by some town property owners.

The BCA suggests that properties with potential for one or two lot subdivisions, or dual occupancy development within the town should not be excluded from the R2 development potential calculations. Infill development takes advantage of existing infrastructure and is therefore potentially less expensive than Greenfield development. It can provide smaller dwellings to suit people who don’t require larger homes and can be provided more quickly than Greenfield development. This type of development would support Council’s policies and plans for more diverse and affordable housing within the LGA.

² [Braidwood summary profile, 2021](#)

There is a discrepancy between the current MLS within the existing town (850m²) and the proposed MLS for Area 1 - Station Street (600-850m²). The BCA suggests that provided the Georgian street pattern in the Heritage listed area is maintained, reduction of the MLS within the town to 600m² could provide opportunities for more infill development and smaller properties to cater for one-person or 2-person households.

MU1 Mixed Use Zoned Land: (p18) The BCA would like clarification of where are the undeveloped parcels of MU1 Commercial land on McKellar St? As residents, we are unable to identify any parcels of undeveloped land in this area. If the undeveloped areas of MU1 land are located on Lascelles St, the report needs to be altered to clearly state this.

Industrial Land: Given the minimal uptake of land in the existing light industrial area on Gillamatong Lane and Sandholes Road, as acknowledged in the Plan (p36), the BCA questions whether there is a need for more land to be zoned Industrial at this time.

What are we managing? Constraints & Opportunities

Heritage

The BCA fully supports the statement '*further development of the town must be managed in a way that contributes to the heritage significance and character of the town and its heritage items.*'

The Natural Environment

The BCA agrees with the approach that '*Future growth areas have attempted to avoid areas of high biodiversity value*'. It notes the other environmental constraints (flooding, steep slopes and bushfire prone'). The BCA suggests that proposed development of land adjacent to Monkittie Creek (Area 2) for R2 residential zoning should be delayed until more detailed assessment of the environmental significance of this land is carried out. Steep slopes near Monkittie Creek and flooding potential also need to be assessed before R2 zoning in Area 2 is approved.

Servicing

The draft Plan notes that '*the existing sewer network has capacity to facilitate a population of 3,000 people*' (p20). Under the average population growth rate, Braidwood's population will reach this level by 2044 in 19 years' time, which may seem an age away. But under the high growth rate it will reach this population by 2035, in just 10 years' time, which means that Council's servicing plans will need updating sooner than later.

It appears the existing water reservoir and network will support around 2,600 people³. This suggests the system will need expanding within 13 years under the average population growth rate and just 7 years under the high population growth scenario. The draft Plan acknowledges that '*In 2019, Braidwood experienced water shortages as the Shoalhaven River stopped running*'. Should we have another drought like the one suffered then, the water shortages will be even more acute with a larger population. The BCA hopes the current refresh of the Integrated Water Cycle Management Plan (IWCMP) will fully address these pressures.

The BCA further notes that during droughts, Council makes a 'drought tap' available for rural residents. This adds significant extra demand on the town water supply, and the use of the tap has been uncontrolled and unmonitored in the past. The BCA would like to know if this has been considered in the estimates? The increased rural residential population in the Braidwood district will increase the demand for water from the town supply during drought periods.

³ 3,000 people will require approximately 2.31 megalitres per day, while capacity is 2 megalitres per day (p20). Calculation: $3,000 * 2/2.31 = 2597$ people.

The BCA agrees that monitoring growth and aligning capacity and future needs will be essential to accommodate any growth that exceeds 2600 people (water being the limiting service). Given that the population of Braidwood in 2021 was 1710 people, an increase in the current population of just under 900 people will reach the limit of the current capacity of the water services, for development requiring those services. If every new home has an average dwelling occupancy of 2.15 persons, (p17) the current services can only provide for just over 400 new dwellings requiring those services.

The BCA notes that these calculations are based on projected increases in the permanent population. If there is an increase in visitor accommodation (via Airbnb etc) demand on the water supply and other services will also increase.

The BCA would like to see a more detailed analysis of the capacity for growth within the township, and the pressure that will place on existing services. This will impact on the capacity for growth outside the existing town limits which require services.

The draft Plan is virtually silent on the issue of stormwater (two passing references), with no discussion in this section on this. Braidwood does not have a stormwater system in the older parts of town. Stormwater has become a live issue for residents over recent wet years with repeated flooding, most notably on Wallace Street. Given Council has just completed a survey of where other existing services are located with a view to see how the stormwater issues can be addressed, it would appear to be high on Council's agenda as well.

The BCA suggests that a paragraph be added to this section which discusses the need and process to address stormwater issues.

Transport & Parking

Since the draft Plan was issued, Transport for NSW released the [Braidwood & Bungendore Transport Study Action Plan](#). This contains a range of high level actions, many reflecting those requested in the BCA's [submission](#) during the public consultation phase. These include the following actions:

- Improved active transport infrastructure within Braidwood.
- Investigate new and upgraded pedestrian crossing facilities at key locations on the Kings Highway.
- Investigate new and improved active transport facilities on local roads within Braidwood.
- Update the Bicycle and Pedestrian Facilities Plan for Braidwood.
- Upgrade the intersection of Wallace Street (Kings Highway) and Lascelles Street.
- Investigate a High Pedestrian Activity Area within Braidwood.
- Investigate temporary peak holiday traffic management mitigations.
- Investigate Electronic Vehicle (EV) charging within Braidwood.

While the report identifies where these actions should take place and the priority of the actions, it often does not identify what the actual measures should be. It is therefore just another step in the process of addressing the transport needs for Braidwood.

The BCA is surprised that the Action Plan is silent on the issue of a bypass since it was a major issue during the consultation process (see below).

The BCA believes that the final Plan should refer to this Action Plan and the process that Council will use to implement the actions falling under its responsibilities.

The BCA is pleased to note the draft Plan acknowledges that *'Community consultation on the Discussion Paper indicated a clear demand for public transport between Braidwood and the*

regional centres of Canberra and Goulburn, to access higher order services such as tertiary education or hospital [note: a better word would be ‘medical’] appointments.’

The BCA would like to underline that public transport is a real problem and would like to see reference to the process that Council will use to address the problem in the final Plan.

The draft Plan makes reference to the findings of the ‘*Braidwood and Bungendore Network Study – Traffic and Transport Study Report*’ (p20).. The BCA believes it is important that this report is released and subject to public scrutiny. It fully supports the GIPA request made by the Braidwood and District Business Chamber to have this report released.

The BCA is surprised that when discussing parking the Plan does not acknowledge the plans for an off-street carpark behind 88 Wallace St. It believes this should be added to the final Plan.

It is becoming increasingly common to see logging and other trucks parked overnight in Wallace and Wilson Streets and on other town streets. The BCA believes the final Plan should address an alternative truck stop outside the centre of the town.

Bypass

The BCA believes that any traffic solution needs to benefit local residents, before it benefits through traffic. A bypass should not just be about getting Canberra residents as fast as they can to the South Coast.

The draft report states that ‘*The latest traffic study commissioned by Transport for NSW does not substantiate the need for a bypass now or in the near future.*’ It also notes ‘*However, as the regional population continues to grow and the Kings Highway remains the primary route to the coast from Canberra, the need may become more pronounced and should therefore be monitored. Council will continue to work with Transport for NSW to negotiate further study and determine a viable route option.*’

As stated above the BCA fully supports the full release of this study so it can see the reasoning for this conclusion, as the [Community Consultation Report](#) of the ‘*Braidwood and Bungendore Transport Study*’ in October 2023 stated:

‘We heard the community would like a bypass around Braidwood. Respondents said they feel the current heavy traffic flow is dangerous for active transport users and impacts local business due to congestion and lack of parking.’

The BCA accepts that there will not be a bypass for Braidwood in the foreseeable future. But this is a clear case where the need for longer term planning is imperative.

The BCA believes that given the potential impact on individual landholders and the broader community, consideration of a preferred route should continue and not be delayed as implied by the draft Plan.

The route will take out a reasonable tract of land and potentially split up rural properties. Current and future landholders deserve to know whether they will be impacted by a potential bypass.

A lot of effort went into the 2023 Discussion Report and the consultation process with suggestions made as to a preferred route. This should be acknowledged in the final Plan.

The BCA also made the important point in the previous consultation that the Structure Plan should examine whether there are alternative routes that heavy trucks can take to bypass the centre of Braidwood, which are causing damage to the historic buildings in Wallace Street.

This appears to have been ignored, and the BCA believes the final Plan should rectify this omission.

On the Western side of Braidwood, it may be possible to have a local bypass along Bombay Road and across Boppings Crossing coming out north of Braidwood town, perhaps north of the Showground. A local bypass on the Eastern side is more difficult because of the Heritage curtilage.

Community Facilities and Services

This a good inventory of what is available. The BCA notes that that there are two medical practices (providing a range of ancillary services like pathology and podiatry) one dental and one veterinary practice as well. Whilst these services are given by private providers, there are obvious community benefits. The BCA believes that Braidwood is lucky to be so well served when many other rural towns do not have these services.

The BCA also notes that Childcare and Early Childhood Education are essential services that must be provided for.

The BCA believes reference should be made to all these services in the final Plan.

Land Use Conflicts

The 400-metre separation buffer distance map (p24) indicates that the required buffer distance would prevent residential development on much of the land in Area 8 between Saleyards Lane and Mt Gillamatong, currently zoned RU1. This conflicts with the suggested future rezoning of this area for R5 large lot residential development.

Braidwood's Future – The Structure Plan

The BCA appreciates the clear and logical way each Area is analysed, with the development principles and key constraints / matters to resolve all set out, before recommendations are made.

The BCA notes that at its Open Meeting on 18 February, Council staff stated that there would *'be no release before 10-15 years'* (which we take to mean no rezoning). This is at odds with the projections for Timing in many of the Areas considered below. The timings of Areas 1,4,5 and 6 are all under 5 years according to the draft Plan.

The BCA also notes that Council staff stated *'there would be a staged release'* which would be *'developer and landowner led'* which matches *'demand with supply'*.

The BCA also notes that some existing residents in the areas below are likely to oppose any rezoning as they do not want to see a change in the land use, because the current land use is why they chose to purchase their land or property. This is understandable, but their objections without other substantial reasons why the rezoning would be inappropriate should not change the recommendations made by Council staff.

Area 1. Station Street

The BCA believes this to be the obvious choice for future development once most of the existing R2 zoned land has been exhausted. It also offers opportunities for existing landowners to sell land they may not need.

The BCA notes that there intends to be progressive rezoning in this area, to match demand for smaller blocks.

The BCA believes that there should be a buffer zone between the new developments and the Kings Highway, to screen new developments from the Highway. town. This buffer zone should

be at least as wide as the current visual curtilage / approach road setback zone along the Kings Highway from before the Showground, as included in the State Heritage listing for Braidwood.

The BCA also suggests consideration be given to including land on the west side of Hoggs Lane (eg DP755954 and DP755954) in this area, as it appears to be similar in terms of available services to the current land proposed for rezoning and is close to the existing residential area on Llewellyn Drive. The BCA proposes that this area should replace the proposed R2 rezoning of Area 2, which is more suitable for larger rural residential blocks which already exist in that area.

Development in the Station St/Glenmore Road area is likely to lead to access issues to the town centre for these new developments. The BCA believes that consideration should be given to alternative access avoiding the Kings Highway, with new bridges across the creek at Ryrie Street and/or Boppings Crossing, to create new car, bicycle and pedestrian crossings. This could require the preparation of additional S.94 plans specific to that area.

Indeed, the BCA believes that consideration should be given to the feasibility of these options in the near future. Part of the land required for a bridge across to Ryrie Street (where Council pipes etc are stored) is currently zoned as Council managed community land and it takes time (+/- 2 years) for such land to be rezoned as Council Operational land. There is currently only one access road to Braidwood from the north, which funnels all traffic from the ACT and the inland areas of NSW. A traffic crisis at that point would create chaos for all traffic along the Kings Highway to and from the coast. An alternative route is needed ASAP.

Area 2. South of Glenmore Road

Current development in this area consists of existing homes on larger rural residential lots, leading to sloping ground above Monkittie Creek.

The BCA opposes the proposed zoning change from C4 to R2 residential development. The area contains an important riparian zone along Monkittie Creek, providing a well-known platypus habitat. The BCA notes that “*minimal HEV mapping (is) identified on the land*” and supports the proposal for “*Detailed HEV investigation (BAM or BDAR)*”. This area also provides a rural landscape outlook from the town, which should be preserved, even though it is not included in the SHL curtilage.

There is scope to provide a fire break from behind Llewellyn Drive through to Bombay Road (the direction of the 2019 fires which threatened Braidwood), which could also form part of a passive recreational area with a bicycle / walking path.

Area 3. Glenmore Road and Boppings Crossing Road

The BCA believes that this area could be rezoned R5, but only until Boppings Crossing Road.

The remainder of the proposed area could remain as currently zoned. The land is not visible from the town but is within walking distance. R5 zoning would not require town sewerage services, and perhaps not town water supply. The BCA believes there is demand for this type of rural residential lifestyle and suggests re-zoning sooner than later, to provide for a range of different housing options.

Area 4. Council Depot

The BCA agrees with the recommendation to re-zone to R1 and supports the relocation of the Council depot as soon as feasible. This is an ideal location for medium density affordable housing to be situated in the town centre, to provide for the needs of the many residents who do not need or want a 3-4 bedroom house on a large block.

Area 5. Lascelles Street

The BCA agrees with the recommendation to re-zone to R1. The BCA notes that as vacant Crown Land this area has an outstanding Land Claim. Therefore, the proposed short-term timing appears optimistic.

The BCA would like to see a mix of housing types at this location and looks forward to seeing Council staff's proposed MLS and consequential yield.

Area 6. Elrington Street

The BCA agrees with the recommendation to re-zone to R1. This is an ideal location for medium density housing for residents who need smaller homes and access to all town services. It would be very suitable for Seniors Housing.

The BCA would like to see a mix of housing types at this location and looks forward to seeing Council staff's proposed MLS and consequential yield.

Area 7. Existing C4 Areas

The BCA agrees with the recommendation to re-zone these areas from C4 to R5.

However, it wants to see development kept below the sight line from roads into Braidwood of Mount Gillamatong (see Area 8 below for reasoning).

The BCA would appreciate clarification why the yield would be '*31 (top) and 9 (bottom) potential lots*'. From the maps provided, it looks like the bottom area is bigger than the top area.

Area 8. Sandholes Road, Saleyards Lane and Gillamatong Lane

The view of Mount Gillamatong is important to many in Braidwood. The land below Mt Gillamatong is clearly visible from the town. Indeed, the first sight of Mount Gillamatong is an indication that residents are nearly home. Maintaining the visual aesthetics of Mount Gillamatong is therefore extremely important.

The BCA is opposed to any development within sight lines of Mount Gillamatong. from roads into Braidwood. There is a need to keep any development as low in the vista as possible.

The BCA notes that Heritage controls (Braidwood DCP 2006) do not allow "*any new structures, including dwellings, tanks, sheds, communication towers, caravans and the like, ... above the 720 metre contour line of Mt Gillamatong*". The BCA would like to see this contour line lowered for the purpose of this Plan.

Further, a large section of this land is within the buffer zones of the saleyards, sewerage works and waste transfer station. This land use conflict is the same as that applying to Area 9, where the conflict is used to justify use for industrial zoning.

Area 9. Future Industrial Bombay and Sandholes Roads

The BCA submits that the terrain of this area would make development difficult, as the land is very uneven, with a water course and many granite outcrops.

The BCA disputes the comment that "*Parcels are too small to viably support primary production*". This land at present supports viable primary production as part of a larger rural land holding.

The existing E3 Industrial area has had minimal uptake, and there is a lot of undeveloped land available at that site. The BCA sees no need for two separate areas of Industrial land until demand is there to justify it.

Implementation and Monitoring

The BCA agrees that the Plan should be able to adapt to changing circumstances and so looks forward to seeing the full Implementation and Monitoring Framework in the final Plan. The BCA would like the annual monitoring results and any conclusions arising from these results to be made public.

A Bypass

In this section, Council staff proposes to ‘*Continue to advocate with Transport for NSW for a future bypass route around Braidwood*’. The BCA believes this action is inadequate.

The BCA welcomes the commitments to advocating for public transport accessibility, implementing the Bicycle and Pedestrian Facilities Plan for Braidwood, reviewing parking demand, supply and restrictions, and implementing the QPRC Integrated Transport Strategy.

Staging and Sequencing

The BCA believes that when the time is right, the first areas to be re-zoned should be:

- Area 1. Station Street, including land to the west of Hoggs Lane, to R2 and consideration of new local access bridges.
- Area 3. Glenmore Road and Boppings Crossing Road to R5.
- Area 6. Elrington Street, Area 4. Council Depot, and Area 5. Lascelles Street to R1.

New Cemetery Location

This section does not appear to be as developed as others. It simply repeats the list of criteria used to identify potential sites given in the discussion paper for the expansion of the SP1 Special Activities Zone.

It concludes ‘*Using the above criteria, two cemetery sites for investigation have been identified in (Map 16. Future Cemetery Analysis).*’

This suggests that something is missing from this section, with the accompanying map also showing three and not two potentially cemetery sites.

The BCA in its previous submission asked that ‘*A short list of the most suitable sites, preferably within 5km of town*’. In this respect, the draft Plan meets this request.

Given the existing cemetery was expected to reach capacity within six to ten years when the discussion paper was released (that would be 4-8 years now), there is some urgency in finalising the location of the Cemetery. This is not acknowledged in the draft Plan and should be in the final Plan.

Before the Plan is finalised, the BCA believes that more work needs to be undertaken on this section, particularly given that the need for a new Cemetery is potentially just 4 years away.

Further Consultation

Council staff indicated at the BCA Open meeting that there would be further public consultation after Council has had feedback from other relevant NSW Government agencies. The BCA would welcome this opportunity, and appreciates the iterative process proposed.

Thank you for the opportunity to comment on the Draft Braidwood Structure Plan.

Sue Murray
President,
Braidwood Community Association

25/03/2025



BRAIDWOOD COMMUNITY ASSOCIATION

Attachment 1

BCA Submission on Braidwood Structure Plan Discussion Paper

The BCA at the outset would like to congratulate the authors of the discussion paper. It is a very thorough document and is very useful for the Braidwood Community to understand the issues involved. We are also appreciative of the way they engaged with the Community and their availability to attend meetings outside their own scheduled consultation.

Questions in Discussion Paper:

1. Does this Vision Statement and the Vision Pillars reflect your views for Braidwood?

The BCA had considerable input into the Vision Document. We support the overarching Vision and the statements of community values. We see these as very broad, high level aspirational values.

2. What opportunities do you see to engage with and recognise First Nation Connection to Country in the Strategic Land use Planning process?

There is a need to seek out information from Yuin people, and to find out who to speak to. We are aware of several communities on the South Coast with connections to the Braidwood District. If or when there is a recognition of First Nations connection to Country (eg through Land Claims), this needs to be considered in the planning process.

3. Is the future desired character right for each of the precincts? If not, what changes would you make to the future character for each of the precincts?

Precinct 1a – Wallace Street Commercial Area

We agree that this is the commercial and social centre of Braidwood. We note that the B4 zone ends at a point on the southern side of Lascelles St, and that commercial development has occurred in this area south of the Service Station (Medical Centre, Jewellery shop). This is a potential location for more commercial development, if the B4 zone was extended further to the south on both sides of Wallace Street. Old residential and commercial buildings in that location could be repurposed for commercial businesses. The location away from the main highway traffic would be an advantage for both locals and visitors.

Suggested changes to Future Desired Character:

- The commercial and social centre of Braidwood
- The historic buildings *are preserved and maintained, while allowing changes and repurposing to meet current standards.*
- *New buildings are sympathetic to the character of the historic buildings (proportions, scale etc)*
- *A welcoming village environment for residents, visitors and local businesses.*
- *Historic elements of streetscape are preserved (eg cobblestone gutters)*
- *Safe pedestrian access is provided between footpaths and roads*

Precinct 1b: Lascelles Street Commercial Area

We note that this is the South-Eastern gateway into Braidwood, not the South-Western gateway. The commercial building is located at the eastern end of the precinct, not the western end.

The Future Desired Character in the Discussion Paper is for a “Distinct commercial area subservient to the Wallace Street commercial area.”

Despite the B4 zoning, the area has not developed into a distinct commercial area. Over the years businesses have come and gone, but most of the existing commercial building is now empty, and no further commercial development has occurred. Reasons for this are unclear. Suggestions include the fact that Kings Highway traffic needs to be negotiated in order to park on the southern side. Pedestrian access from the main commercial centre also requires crossing a busy highway. There is no footpath from Wallace Street to this area. The Braidwood Bakery has an approved DA for a new bakery and retail outlet there but so far has not proceeded to develop it. The only occupant of the commercial building at present is the Chemist. While it is a suitable building, the location isn't ideal. For ease of access, most residents would prefer The Chemist to be in the Wallace Street commercial area. Development costs including provision of off-street parking may also be a reason for the lack of commercial development on vacant land.

On the southern side of Lascelles Street, residential development with access from rear laneways would be a better option. The location suits future medium density housing, which the town desperately needs. A combination of commercial and shop-top housing is another option.

For the Future Desired Character, we suggest:

- Remove “Distinct Commercial Area subservient to the Wallace Street commercial area”.

Replace with:

- *A combination of residential and small-scale commercial development.*
- *Zoning allows for a mix of commercial and residential development, including medium density/shop-top housing.*
- *New development is sympathetic to Braidwood's heritage architecture in scale and design.*

Precinct 2: Residential Areas within Historic Town Boundary

We agree that the low scale, leafy green country residential character should be preserved, but as there are already some 2 storey buildings in this area, others could be permitted if they are sympathetic in design to surrounding housing. Development should reflect changes in architectural styles over time. Infill development suited to the location should be permitted, while retaining the existing leafy green character of the streetscapes. Given the need for more diversified housing options in Braidwood, planning support for medium density housing, dual occupancies, secondary dwellings and Seniors housing within this area is recommended.

Note later comments on the preservation and development of the local Urban Forest.

Precinct 3: Residential Areas west of Ryrie Street

We disagree with the statement that this area is “on the edge and not strongly connected to the town”. It is as much a part of our town as the historic centre. It is architecturally diverse and reflects development from all periods of Braidwood's history. Future desired character should continue this diversity of styles and types of housing. There are opportunities for infill development and medium density housing in this precinct. Active transport connection (footpaths) would be very welcome, as Braidwood has very few footpaths for recreational and active transport use.

Precinct 4: Residential Areas south of the Historic Town Boundary (Braidwood Ridge)

This development sits quietly on the edge of the town, without impacting on the Heritage Conservation Area.

Successes:

1. It has encouraged sympathetic development of a new residential area close to the historic centre. Council has been diligent in enforcing planning guidelines re setback, heights etc.
2. It has attracted new residents of all ages.
3. It is not visible from the rest of the town. We disagree that there is a “strong visual connection to the Wallace Street commercial precinct”. While the grid plan of the town centre is maintained, there is no visual link between the two areas.

Challenges:

1. Access roads are limited. Escape during a fire or other disaster could be impossible if the main access road (Elrington Street) was blocked. It is outside the limits of the town-based Fire and Rescue Service. This needs to be addressed.
2. There is very little green space and no playground areas for children. We recommend that future Greenfield developments include more green space for public recreation.

Precinct 5: Ryrie Park

This section refers only to Ryrie Park South. Ryrie Park includes both the north and south sections of the park. There is no description of Ryrie Park North.

Note: the electric BBQ’s are located in Ryrie Park North, not South.

We support the continuation of the historic layout and character of Ryrie Park South, with mature trees providing deep shade and shelter.

Key Features: Add: The Dhurga Rock.

Future Desired Character: Add

- *A plan for replacement of mature trees is recommended.*
- *Retain a clear open space in the S-W near the Royal Hotel for events.*

Precinct 6: Former Police Paddock:

Future Desired Character:

Retain as rural landscape on the edge of town, contributing to the clear visual distinction between the town and its rural setting.

Precinct 7: Rural and environmental and surrounding the south, east and north edges of town.

This precinct includes Visual Curtilage areas as defined in the State Heritage listed ‘Braidwood and its Setting’ item. These areas have been preserved from residential development over time through ownership of the land by very few landowners from the period of colonial settlement. An understanding of Braidwood’s land ownership history is important to a full appreciation of the current situation.

Some long-term landowners are now in a situation where they own valuable land they cannot develop. Some of the land to the east of town may be suitable for subdivision into large residential lots, while preserving the visual distinction between the historic town and the rural setting. There is already residential development along Little River Road, which cannot be seen from the town. The elevated land to the north (Wilson’s Hill) provides important rural vistas visible from town, and these should be preserved.

The BCA supports the preservation of our rural vistas and clear boundaries between the town and the rural setting. However, the success of the Braidwood Ridge development shows that extension of the town boundaries can be achieved without impacting on the central Heritage Conservation Area and the heritage character of the town centre. The Summerfield Seniors Village is located on former rural land to the east of the town, but has no impact on the views from town.

We note that Map 44 includes areas for possible future development to the north of Braidwood that are within the visual curtilage and the buffer zone, as indicated on Map 11. We do not support R1, R2 or R5 zoning within the viewsheds from the town.

The 15 Year review of the State Heritage Listing of 'Braidwood and its Setting' should shed some light on these issues as they have played out over time since the Heritage listing in 2006. Council should not be left to determine the location of development outside current town boundaries without input from the State Government, NSW Heritage Council, and Heritage NSW, including the results of the 15 Year Review of the State Heritage Listing.

Precinct 8 – Approach roads

We agree that the 'rural feel' of these approach roads should be retained. The poplar avenues on the northern and eastern (not southern) Kings Hwy entrances are visually and historically important and should be protected. The secondary approach roads (Nerriga, Little River, Bombay and Araluen Roads) all include some low-density residential development but still retain a rural feel.

Should land zoned for Industrial uses be a separate precinct?

The Light Industrial zone at the intersection of Araluen Road and Gillamatong Lane has developed slowly but is now effectively a distinct precinct, surrounded by land zoned R2 Low Density Residential. Much of the Light Industrial land has remained undeveloped, especially below the saleyards. Reasons for this are not clear. Suggestions include proximity to the saleyards, and the costs of development for small-scale light industry. The undeveloped land is not currently serviced and is essentially still rural land.

We agree that this should be a distinct precinct, as it is already developing as a de facto Light Industrial area. The Future Desired Character needs to be compatible with the nearby existing Low Density residential development. The location below Mt Gillamatong is a visually sensitive area more suited to residential development, but the existing development is now too far advanced to be reversed. Future development approvals should include Conditions of Consent to plant trees to hide these industrial sites from the main town, and to provide shade for heat mitigation.

Note: while this area is not included in the Heritage Curtilage, it is clearly visible from some parts of town. This has become obvious since the formerly pale green Braidwood Rural building was painted bright blue, to match Mitre 10 branding. The visual impact of this change is regrettable, as it previously blended into the landscape below Mt Gillamatong.

Community

Population

The data indicating that population growth slowed during 2016 and 2021 raises some questions, as this does not accord with observed increases in the number of new dwellings built and the tight market for housing at that time. Competition for rental properties and purchase of existing homes has pushed up prices and rents, to a marked degree. We have analysed this further in the section on the growth rate and future land supply (p116) and in Attachment 1.

Other comments:

The Age Structure data and Land-Use Planning implications (p44) are interesting. We strongly support the Land-Use Planning Implications as a guide to the type of housing and services that will be required. We note the comment (p46) that “since 2001 medium density housing has increased as a percentage of the overall housing stock”. There is very little medium density housing in Braidwood. At 4-7% of the housing stock, it is a minute proportion of the total housing stock. The increased percentage probably reflects the development of 41 dwellings between 2016 and 2021 in the Summerfield Seniors Village.

At the same time, household structures have changed, and “The largest household structure type in Braidwood is the lone person household” (p45). As the Discussion Paper notes, the land-use implications include the “suitability of current household stock for lone person households.” The number of unoccupied homes in 2021 (140) may reflect this to a degree. We note the high proportion of unoccupied dwellings (15.2%). See Attachment 1 for a further discussion on the possible reasons for this.

We note that under **Housing Affordability** (p47) there are references to Bungendore households. We are not sure if the information refers to Braidwood or Bungendore.

We hope that the correct information is being used and that the QPRC Housing Affordability Study by Judith Stubbs and Associates will be used as a source of information for the Braidwood Structure Plan.

We support the need for suitable Seniors Housing (p47) as well as affordable housing for more vulnerable members of the community. The BCA submission on QPRC’s Affordable Housing Policy contains more information about this.

Services and facilities

Is the land available adequate for the future needs of the Braidwood Multipurpose Health Facility? p48

We leave this to others with greater knowledge of MPS issues.

Is the land available adequate for the future needs of Braidwood schools? p50

We leave this to others with greater knowledge of education issues, noting that the Braidwood Central School site has no room for further expansion. St Bede’s School is currently undergoing renovation and extension.

Emergency Services: Are these services adequate for the current population? When are additional facilities or expansion required? p52

The current Police Station within the old Court House is inadequate. The promise of a new or upgraded police station several years ago has not been delivered. No reason has been given. We leave it to others with more information on the other services to comment.

Social, Recreational and Community

Community

Note: There is no smart hub at the Council Office. Plans for this several years ago did not proceed. The Braidwood CWA is in the process of setting up a Smart Hub on a trial basis.

Parks and Reserves

Note 1: “Braidwood Memorial Park” is not a term used in Braidwood. It appears to refer to the northern half of Ryrie Park. The name ‘Ryrie Park’ has traditionally included both the north and south sections of this park. Ryrie Park North contains the swimming pool (not listed).

Note 2: Hassall Reserve is spelt with two ll’s. It is named after a prominent former member of the community.

Environmental factors

What environmental factors are most important to you when considering land use planning? p55

We agree that development on land with a slope in excess of 18 degrees should be avoided.

We agree that development along the watercourses needs to be subject to constraints as described under Land-Use Planning Implications (p57-58). We support greater public access to the creeks in the form of footpaths to encourage active recreation, while ensuring protection of biodiversity on riparian land and water quality.

Without further information, we question the identification of land located immediately to the north of Braidwood, on the western side of the Kings Hwy as being of High Environmental Value (Map 19). This appears to be land currently used for pastoral activities and low-density residential use in the Glenmore Road/Station Street area.

Within the Braidwood urban area, the preservation and development of the local urban forest is a crucial issue. The urban forest can be defined as “all trees and other vegetation within [an urban area] and the soil and water that supports it”.

We agree that the **viewsheds and the rural setting** are an important part of the “Braidwood and Its Setting” State Heritage Conservation listing. We agree that “View corridors to be confirmed and managed to limit urban development (p58).” We also suggest that large scale, low-density rural residential development (C4 zoning) could be considered on the eastern side of town, and to the north-west, where this type of development already exists. There are areas to the north-west that are suitable for higher density (R1 and R2 zoning) development but are shown on Map 19 as having High Environmental Value. More onsite investigation of these areas is required.

Heritage

Braidwood’s State Heritage Listing impacts on development both within and around the town. It has encouraged the development of the tourism industry, while limiting development options in the ‘Braidwood and Its Setting’ Conservation Area. We support the Land-Use Planning Implications (p61) while noting that the 15 Year Review of Braidwood’s State Heritage Listing needs to be considered in developing the Braidwood Structure Plan. We are still waiting for the results of this review to be released by Heritage NSW.

Aspect

We support the Land-Use Planning Implications re northerly orientations where possible, while managing risk factors. We support the application of Urban Forest principles and encouragement of tree planting of fire-retardant species in urban areas.

Land and Soil Capability

Agriculture is still the major industry in the Braidwood area. Sustainable Agricultural practices are being applied by an increasing number of local farmers. We agree that incompatible land uses on adjacent land can threaten sustainable agricultural practice. An example from several years ago (2018) was the proposal for a Mine Accommodation Camp (described as a Caravan Park) on RU1 Rural land, on a site that was unsuitable for several reasons, including proximity to productive agricultural land. This DA was approved by Council but did not proceed. We support the Land-Use Planning Implications (p65) and recommend that important and productive agricultural land is protected from development.

Noise and Odour

We support the Land-use Planning Implications (p67) re providing buffers between noise and odour sources and residential areas.

The implications of this for development in the Light Industrial Zone are that approvals for industries in that area will need to have constraints on the emission of noise and odour to prevent any impact on existing adjacent residential areas. Visual barriers such as tree corridors are also recommended.

Natural Hazards

Climate Change

What do you think land use planning can do to reduce the risks posed by climate change?
p70

Water supply. We all know we will be in drought again at some time in the future. With more extreme weather events becoming the norm due to climate change, we cannot rule out another drought as extreme as the last one when the Shoalhaven stopped flowing. This is the source of Braidwood's water supply and residents still remember they were under water restrictions from late 2019 to early 2020, reaching Stage 4 water restrictions in early 2020 (eg external watering of plants only permitted using non-potable water). During this period water had to be carted into Braidwood.

Either alternative water supply sources (eg bores) or a larger holding reservoir need to be provided. Otherwise, we will see the situation of 2019-20 repeated and potentially worse with an expected larger population. You cannot plan for an expanded population without expanded water supply.

Heat Mitigation. The discussion paper is silent on this issue. Planning has a key role in addressing the issue of heat mitigation. This includes the design of public spaces, streetscapes and open space to ensure adequate space both above and below ground to support tree growth and vegetation to create healthy, resilient, equitable and responsive places. In particular, through more tree planting in the right places (eg over footpaths) there can be a significant cooling effect for pedestrians.

Specifically on land use planning, QPRC should work with developers and business owners to deliver greening particularly in industrial areas, new release areas and as part of urban renewal projects. We also recommend changing planning regulations to ensure building design includes passive solar considerations.

The full implementation of the QPRC Urban Forest and Cooling Strategy is required.

Flooding

We note that development on flood-prone land is permitted where the development is compatible with flood function and behaviour. Given the uncertainty associated with climate change, we question whether this is still an advisable policy. We also note that Braidwood does not have an effective stormwater management infrastructure, and localised flooding occurs within the town, not just along the creeks. This was particularly severe during the recent unprecedented wet years. Properties on Wallace Street, our main commercial zone, were flooded several times during extreme rain events.

We support the Land-use Planning Implications (p71) but recommend including a statement on the need to develop an effective stormwater management system to prevent flooding in residential and commercial areas in the town.

Bushfire

Bushfires surrounded the town of Braidwood for over 2 months in from late November 2019 to January 2020. The first fires in late November came within a couple of kilometres of the

town on the western side, and local residents risked their lives to create containment lines to protect the town.

We support the Land-Use Planning Implications (p73). We also recommend that fire-retardant tree species be used in future tree plantings in the town, and that fire-retardant windbreaks be planted to protect any new housing developments on the western side of town. The QPRC Urban Forest Strategy that has yet to be implemented will also provide some protection from future bushfires.

We suggest that a pathway from Hoggs Lane down to and across Gillamatong Creek behind the golf course would assist in providing access to town from Glenmore Road during a fire emergency and would also allow access for the creation of containment lines to protect Braidwood from the west.

Planning for emergency access and egress from new developments is essential. The access roads to and from Braidwood Ridge are not adequate for entry or exit in an emergency. There are no exits to the west or south and Elrington Street is the main entry/exit point for most of the development.

Economic and Employment

Two points emerge from the data on money spent in Braidwood:

- Many businesses rely heavily on visitor spending.
- Visitor spending has increased significantly between 2019 and 2021.

We note these businesses would be mainly located in the commercial centre or provide visitor accommodation. Mona Farm is probably contributing significantly to the increase in visitor spending, through wedding events and accommodation.

We also note that there are many businesses in the town and surrounding area that do not rely on visitor spending. Local businesses providing trade and other services and suppliers of agricultural and construction materials and hardware are some examples. These will contribute to and benefit from an increase in the permanent and part-time population.

Should car parking requirements increase in town, particularly for day-trippers? p76

Car parking facilities in and around the commercial centre are already beyond capacity at certain times of the week, and especially in holiday periods. There is no designated off-street parking, and the residential side streets are becoming de facto carparks. This is impacting on the grass verges and may also be affecting stormwater drainage. Highway traffic through Braidwood results in periods where traffic slows to a standstill, and parking is almost impossible. This impacts on residents as well as day-trippers. There is a critical need for more parking spaces. Caravans, boats etc often park along residential streets, especially Duncan Street. Specified parking areas for these large vehicles may help to overcome this problem.

Do the economic factors support an increased diversity of businesses? Or just hospitality businesses? p76

Braidwood already supports a diversity of businesses as indicated in Figure 21, 'Employment by Industry Sector'. The data shows that the local workforce is spread throughout a range of industries. Retail trade, accommodation and food services are important but are not the main sources of employment and personal income. Retail and hospitality businesses in Braidwood come and go. Some are firmly established within the local economy, others last only a short time. Businesses that cater mainly to visitors are more volatile than those providing for the essential needs of local residents. Hospitality businesses find it hard to maintain a stable workforce.

What is the demand for housing and services by workforce and the longevity of the demand? p78

We do not have the expertise to answer this question. Dargues Reef Gold Mine has provided employment for some local residents (number unknown) and has increased demand for housing, but the mine is predicted to close in 2024. This should release some local housing back onto the local market. The long-term land supply and type of zoned land is inadequate for the predicted growth of Braidwood and the age characteristics of the residents.

Travel to work

We agree with the Land-Use Planning Implications (p80). Increasing numbers of home-based workers have increase the need for active transport options, separate workspaces and reliable internet. The general population also requires more active transport options (footpaths and cycle paths), and reliable internet.

Infrastructure

Sewage Treatment Plant

We agree that the projected growth rate in the IWCMS (2018) of 1.2% needs to be reconsidered. Planning for an expansion of the STP needs to occur well before its current capacity is reached.

Water Treatment Plant

As noted above, the projected growth rate of 1.2% needs to be reconsidered. Future impacts of severe drought need to be factored into planning for Braidwood's water supply. We note that in 2019, the Shoalhaven River, local creeks and dams all dried up. Rural residents were drawing on the limited supply in the town reservoir from the public 'drought tap' in Mackellar St. The actual population using the town water was much higher than the town's population. This was noted at the time. The bushfires also increased the demand on the limited water available. These factors will occur again in the future, and Braidwood's current water supply and storage will not be adequate to cope.

Cemeteries

Map 31 shows suitable and unsuitable land for a future cemetery. A short list of the most suitable sites, preferably within 5km of town would be helpful.

Transport

Bypass

Do you think a bypass around Braidwood is needed? p91

A bypass as currently envisaged will bring significant benefits to those travelling to / from the south coast, particularly during peak vacation times. The benefits to residents and businesses are less clear cut. The most obvious benefit would be to reduce the current traffic congestion through town in peak periods such as weekends and holidays. This problem of traffic congestion was noted in 2017 and it has become much worse in recent years, except for the bushfire period and Covid-19 lockdowns. It may also help to divert some of the heavy vehicle traffic currently travelling through town.

In determining the route of a bypass, a key consideration must be to protect the heritage values of Braidwood. In this respect, the route chosen should not go through the Braidwood curtilage.

What problem do you think the bypass will help to solve? p93

The options proposed will solve the traffic congestion coming into and out from Braidwood, particularly during peak vacation times, along the Kings Highway. It will also reduce the "rat run" traffic on Braidwood's residential streets, whereby travellers try to bypass the Wallace Street congestion.

It will do very little to address the issue of heavy trucks (mainly logging, gravel and other materials) passing through the centre of Braidwood as these come from multiple directions. The main concern is that the vibrations these heavy trucks are generating are damaging the foundations of heritage buildings in Wallace Street. This is yet to be proven, and so the BCA encourages QPRC to have structural engineers investigate whether this is a justifiable concern and if so to have an ongoing monitoring system. The heavy vehicles also add a significant noise factor and pose safety risks for pedestrians in Wallace Street.

The Structure Plan should examine whether there are alternative routes that heavy trucks can take to bypass the centre of Braidwood. Note that mine traffic from Majors Creek is very unlikely to be a factor by the time a bypass is built. The mine is projected to close by the end of 2024.

Of the Conceptual Bypass Examples on Map 33, the Long Eastern Route appears to be the best option. The medium and short Eastern routes traverse the Heritage Curtilage to the north and east and are too close to town in terms of noise and visual impact. The Long Western route is not cost-effective. The short and medium Western routes would create a barrier between the town and Mt Gillamatong and are too close to town in terms of noise and visual impact. We note the current issues facing QPRC re noise mitigation from the EDE and recommend that this be considered when deciding on a suitable route around Braidwood.

A decision on a future bypass route needs to be made to give certainty to landowners who may be affected. We agree that pre-planning involving community, government and road authorities is indispensable in mitigating economic and other impacts.

Public Transport

Braidwood has no public transport. The Braidwood bus routes described are school buses, not public transport.

Active Transport

What factors do you think would encourage more people to walk into town, to school, to the parks for work and/ or for leisure? p96

Completion of the planned paths in the [Bicycle and Pedestrian Facilities Plan](#) for Braidwood. In this respect, the recent announcement of a contract being awarded for a number of the paths is welcomed.

Improved street lighting would also encourage people to walk in the town after dark. At present street lighting away from the commercial centre is minimal, and safety considerations discourage walking or cycling around town at night.

Would an improved or extended shared path system make a difference to active transport? p98

Yes. Braidwood has the highest percentage (12.3%) of people who walk or cycle compared to the rest of the LGA and yet the town is still to have a proper network of foot and bicycle paths (source: Integrated Transport Strategy p49). The BCA strongly supports the full implementation of the Bicycle and Pedestrian Facilities Plan for Braidwood as soon as feasible.

There is also considerable interest in a recreational path around the outskirts of Braidwood for the benefit of residents and visitors alike. The BCA believes the Structure Plan process could examine the feasibility of this and whether such a path would need any new access permissions or land use designations. Suggestions for routes include:

- Walking paths along Flood and Gillamatong Creeks.

- A walking/cycle path from Glenmore Road, down Hoggs Lane and across Monkittee Creek to the back of the golf course. This could join a walking path along the creek from the Braidwood Common. This would also provide access for the creation of containment lines in the event of another bushfire emergency.
- A pedestrian/cycle path across Gillamatong Creek from the north end of Ryrie Street to Glenmore Road to enable pedestrians to avoid negotiating the busy Kings Hwy at the northern end of town. Glenmore Road is a popular recreational walking route for town residents.

We note that Map 35 uses the descriptor ‘Ryrie Park’ for the southern section of the park only. Braidwood residents traditionally refer to both sections of the park as Ryrie Park. The term ‘Braidwood Memorial Park’ is not used and we request that the maps be altered to reflect local usage. Memorials are located in a section of Ryrie Park South, near the War Memorial.

Development Activity and Opportunities

Growth rates and Residential land requirements

Should the extent of any of the residential zones, in particular the R1 general residential zone be expanded to increase the housing options within the village? p105

There is an identified need for medium density and multi-dwelling housing in Braidwood, to provide a more diversified range of housing options to suit the changing demographics, and to increase the available housing stock.

Permissible development in R1 zones includes hostels, multi-dwelling housing and residential flat buildings. Backpackers’ accommodation, hotel or motel accommodation and serviced apartments are also allowed in R1 zones but prohibited in R2 zones.

There are only two R1 residential zones in Braidwood (see Map 38, p102) The assumption that infill development on this land will all be two-bedroom multi-dwelling housing (p115) is theoretical and cannot be enforced.

Permissible housing options in R2 zones (ie most of Braidwood township) includes a range of housing options, eg attached dwellings, boarding houses, dual occupancies, secondary dwellings, semi-detached dwellings and Seniors housing, although further planning constraints and local conditions may limit these options in reality. Within the R2 zone, there are few locations where multi-dwelling housing, residential flat buildings, hostels etc as permitted in R1 zones would be suitable. In most of Precinct 2, these would not be compatible with the existing low scale country residential character. Land owned by the Masonic Lodge in Elrington Street would be suitable for Seniors housing, which is already permitted at that location. Multi-dwelling housing could be built on that site, if it is designed to be compatible with the surrounding area and the requirements of the Braidwood DCP.

In Precinct 3 (Residential areas west of Ryrie Street), there may be sites suitable for R1 zoning to encourage medium density and multi-dwelling housing, although the current low-scale country residential character should be retained. Some of this land is not sewered, and the land along Araluen Road has a rural country living character which should be retained. Blending new development in Precinct 3 with the existing residential character may require specific development controls.

The vacant land on Lascelles street is zoned B4 mixed use and a range of accommodation and commercial uses are permissible. What do you think is preventing this land from being developed?

See previous comments re Precinct 1b. This land is suitable for multi-dwelling residential development. It would also be very suitable for a motel.

Please give us your feedback on the growth rate and future land supply p116

The table on population growth states it is 'Usual Resident Population'. This is misleading as it is the population recorded in Braidwood Suburbs and Localities in the 5 yearly Census. It is not the 'usual' population, nor the 'resident' population as the Census includes visitors.

There is a noticeable fall off in the rate of annual population growth in 2021 (+0.8% pa) compared to previous Census (+2% pa) for the indicator used, namely Braidwood (Suburbs and Localities). We believe that this indicator is not recording the true underlying population growth in 2021 and that this may have been mainly due to the impact of Covid-19 restrictions at that time with an increase in the number of vacant properties, which may have been Airbnb accommodation, also lower accommodation rates in motels and hotels. See attachment 1 for detail.

The significance of this is that when looking forward a higher population growth assumption should be used (+2.5% pa) and not the lower rate (1.2% pa).

Does the land identified as suitable for future urban development reflect your knowledge of the land? p120

- **Land within the Heritage Curtilage.** Map 44 identifies some areas as suitable for future urban development that are within the Heritage Curtilage. The BCA recommends that Greenfield land within the curtilage that is clearly visible from the town should not be identified as suitable for R1 or R2 residential development. Maintaining the clear demarcation between the town and its rural setting is very important. Land within the Curtilage that is not visible from town could be suitable for C2 or R5 zoning, if it is not currently used for agricultural production. Conditions of Consent to ensure that the rural character is maintained are recommended. Building envelopes could be identified, and tree screening could be a Condition of Consent. More trees planted on the outskirts of the town will also contribute to heat mitigation and bushfire management.
- **Land identified as unsuitable for development,** located close to town along Glenmore Road requires further investigation. This land is currently zoned as C4 Environmental Living and appears to be very suitable for residential development. There are residential dwellings already located there. The distance from town meets the theme of Town Contiguity identified on p119. This land is within a suitable distance of active transport routes which already exist, or could be developed eg a future pedestrian/cycle bridge across Gillamatong Creek to Ryrie Street. This route meets the location of Braidwood Central School (BCS) and is close to the Commercial Centre. The BCS campus includes land used for Agricultural education on both sides of the creek, and the school would definitely use a bridge across the creek from Ryrie Street.
- We recommend that residential development in the area located north of the town to the west of the Kings Highway would be the most suitable option. The land is flat or gently undulating and is not visible from the town. It already has some residential development, combined with small scale agriculture. Access roads already exist, and the location near the Kings Highway permits easy access and egress for emergency services. Active transport options exist and could be further developed.
- There is an area of R5 residential development located off Glenmore Road, along Hoggs Lane and Llewellyn Drive. This could be linked to town via a pathway from Glenmore Road across Gillamatong Creek. There is already an existing small bridge across the creek to the back of the golf course, which could be developed as a walking/cycle path.

Are there other ways to cater and implement options for growth in Braidwood? p124

The BCA supports

- Incorporating Aboriginal knowledge and connection to Country in strategic plans.
- Retaining and enhancing the visible town identity and heritage.
- Protecting the rural landscapes and vistas surrounding the town, while allowing for strategically located R5 and C4 development.
- Retaining the rural character of entry roads, with glimpses of rolling green hills between avenues of trees.
- Tree planting to lower temperatures and provide shade, cooler footpaths and carparks.
- Creating active transport connections along residential streets, between public green spaces, and new residential developments.
- Improved street lighting in residential areas.
- Ensuring services and infrastructure including high-speed internet are provided to support the current and future needs of the community.
- Encouraging the development of accommodation for essential key workers eg teachers, emergency services workers, police and health and aged care workers.
- Supporting opportunities for start-up agricultural businesses, innovative commercial businesses and light industry.
- Supporting opportunities for employment in the tourism and creative/artistic sectors.

We also suggest:

- Encouraging opportunities for more short-term accommodation for overnight visitors eg another motel.
- Moving the Council works depot out of the centre of town, to open up that space for off-street car-parking and residential development.
- Fast-tracking the development of the 88 Wallace Street project to provide off-street parking and medium density or multi-dwelling housing on the land behind the former D&S Motors site.

Are there preferred funding options or other sources available? p128

The BCA supports Council in implementing legislated Development Contribution Plans, Development Servicing Plans and Local Planning Agreements where appropriate, to assist with funding new developments. We also support all efforts to obtain grant funding from both State and Federal governments.

Thank you for the opportunity to comment on the Braidwood Structure Plan Discussion Paper.

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28 April 2023

Population and Dwellings Growth Rates for Braidwood.

As anyone who has tried to get a builder in recent years would know, there has been a building boom in Braidwood between 2016 and 2021. Although this is small in absolute numbers with on average 27 pa additional properties recorded between 2016 and 2021, compared to 11 pa additional properties between 2011 and 2016. That is an average growth rate in properties of 3.5% pa between 2016 and 2021 compared to 1.5% pa between 2011 and 2016.

Conversely, the population growth for the area chosen to be used, namely Braidwood (Suburbs and Localities), slowed to just 0.8% pa between 2016 and 2021, compared to 2.0% pa between 2016 and 2021.

This is a marked difference compared to the growth of inner town Braidwood, which increased by 2.2% pa; the growth of the rural part of the broader Braidwood district, which increased by 3.6% pa; and the whole of the Queanbeyan-Palerang LGA population, which increased by 26% pa (see table attached which also give a definition of each area). If you subtract inner Braidwood from Braidwood (Suburbs and Localities) you get a decline in the population of 3.8% pa in what could be considered outer Braidwood.

Why is there such a disparity? One possibly answer is the substantial increase in the number of unoccupied private dwellings between 2016 and 2021 by 34 to 140 dwellings, which is an increase of 6.4% pa.

It will be recollected that the 2021 Census took part during Covid-19 movement restrictions, when there were very few short-term visitors. With the growth of Airbnb during this period, the increase in unoccupied properties could be in part due to this. Lower accommodation rates in other accommodation such as motels and hotels would contribute to this. Some homes in Braidwood are secondary dwellings for people who live elsewhere and may not have been there because of the restrictions in force. In a more normal situation, you would expect that some of these properties would be let out with a higher population estimate and lower number of unoccupied properties.

Another possible factor is the development of the Summerfield retirement complex. Between 2016 and 2021 some 41 dwellings were constructed at Summerfield. The occupancy rate of these homes is 1 to 2 persons which is lower than most family homes, and this would result in a falling in the population density. However, Summerfield appears to be within inner town Braidwood, and if this was the key factor, then there would not have been the higher 2.2% pa growth for this area.

Further, some unoccupied family homes are owned by older residents who have moved to a higher level of care but are discouraged from renting or selling their homes by current Centrelink Aged Pension rules which count income from these homes (via rent or sale) as an asset. Leaving these homes empty is the only sensible financial option for some elderly people who need their pension income to live on. Families looking for a home in Braidwood could be renting or buying these houses if the pension asset rules were modified.



BRAIDWOOD COMMUNITY ASSOCIATION

Braidwood Suburb - Dwelling type													
	Number					Change - number				Change - average annual percentage			
	2001	2006	2011	2016	2021	2001 to 2006	2006 to 2011	2011 to 2016	2016 to 2021	2001 to 2006	2006 to 2011	2011 to 2016	2016 to 2021
Occupied private dwellings	504	561	601	676	776	+57	+40	+75	+100	2.3%	1.4%	2.5%	3.0%
Unoccupied private dwellings	148	145	123	106	140	-3	-22	-17	+34	-0.4%	-3.0%	-2.8%	6.4%
Non private dwellings	7	4	6	3	5	-3	+2	-3	+2	-8.6%	10.0%	-10.0%	13.3%
Total dwellings	659	711	730	785	921	+52	+19	+55	+136	1.6%	0.5%	1.5%	3.5%
<i>Average number of new dwellings per year</i>						+10	+4	+11	+27				
Source: Australian Bureau of Statistics, Census of Population and Housing. Compiled and presented by .id (informed decisions).													
https://profile.id.com.au/queanbeyan-palerang/dwellings													
Braidwood and District Population Estimates													
	Number					Change - number				Change - average annual percentage			
	2001	2006	2011	2016	2021	2001 to 2006	2006 to 2011	2011 to 2016	2016 to 2021	2001 to 2006	2006 to 2011	2011 to 2016	2016 to 2021
Braidwood (Suburbs and Localities) ¹	1,006	1,110	1,498	1,651	1,720	+104	+388	+153	+69	2.1%	7.0%	2.0%	0.8%
Braidwood (Inner town) ²	1,003	1,110	1,162	1,276	1,416	+107	+52	+114	+140	2.1%	0.9%	2.0%	2.2%
Outer Braidwood (2-1)	3	-	336	375	304	-3	+336	+39	-71	-20.0%	-	2.3%	-3.8%
Braidwood (Statistical Areas Level 2) ³	2,634	3,215	3,357	3,872	4,343	+581	+142	+515	+471	4.4%	0.9%	3.1%	2.4%
Regional Braidwood (3-1)	1,628	2,105	1,859	2,221	2,623	+477	-246	+362	+402	5.9%	-2.3%	3.9%	3.6%
Post Code 2622	2,634	3,036	3,258	3,922	4,141	+402	+222	+664	+219	3.1%	1.5%	4.1%	1.1%
Queanbeyan-Palerang LGA ⁴		48,290	52,343	56,027	63,304	+48,290	+4,053	+3,684	+7,277		1.7%	1.4%	2.6%
Braidwood as % of QPRC		2.3%	2.9%	2.9%	2.7%								
2622 as % of QPRC		6.3%	6.2%	7.0%	6.5%								
¹ Area	3.8 sq. Kms	3.8 sq. Kms	234.1 sq Kms	234.6 sq Kms	234.6 sq Kms								
Area Code	UCL 113000	UCL 113000	SSC10322	SSC10547	SAL10544								
Description	Braidwood	Braidwood	Braidwood	Braidwood	Braidwood								
² Sum of 10102100704, 10102100703 and 10102100705 for 2011-22 and sum of 1170704 and 1170702 for 2001-06													
³ Area	3321.7 sq. Km	3772.1 sq. Kms	3418.5 sq Kms	3418.4 sq Kms	3418.4 sq Kms								
Area Code	145107250	145106184	145107250	101021007	101021007								
Description	Tallaganda (A)	Palerang (A) - Pt B (SLA)	Braidwood	Braidwood	Braidwood								
⁴ Sum of Queanbeyan and Palerang for 2006-2011													
Source: Australian Bureau of Statistics													
https://www.abs.gov.au/census/find-census-data/search-by-area													