



An Australian Government Initiative



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Strategic Planning
Snowy Monaro Regional Council
81 Commissioner Street
Cooma, NSW 2630

Via: council@snowymonaro.nsw.gov.au

Re: Feedback on the draft Jindabyne Development Control Plan

This submission by Regional Development Australia Southern Inland (RDASI) is to provide feedback on the draft Jindabyne Development Control Plan.

RDASI is represented by local leaders and staff who are passionate about the communities in the Southern Inland region of New South Wales (NSW). Part of a national network of 52 Regional Development Australia (RDA) Boards across Australia, RDASI's role is to support the Local Government Areas (LGAs) in the Southern Inland region of NSW, including Wingecarribee, Goulburn Mulwaree, Upper Lachlan, Hilltops, Yass Valley, Queanbeyan-Palerang, and Snowy Monaro. RDASI works with all levels of government, business, and community groups to promote economic and social development in the region by facilitating regional projects, collaboration, communication, and advocacy.

RDASI's strategic focus aligns with the multifaceted nature of regional development, addressing key pillars such as workforce development, business sustainability, digital inclusion, infrastructure enhancement, and strategic planning. By advocating for and facilitating access to services in these areas, Regional Development Australia Southern Inland aims to contribute significantly to the overall prosperity, liveability, and resilience of the region.

To this effect, we have conducted our review of the [Draft Jindabyne Development Control Plan](#) (DCP), taking particular care to ensure the DCP supports the development of adequate housing and childcare facilities and that digital connectivity measures are in place to guarantee residents and business owners access to reliable internet and phone connections.

We present our findings in the report below.

RDASI's review of the [Draft Jindabyne Development Control Plan](#) (DCP) incorporated a review of the [Snowy River Local Environmental Plan 2013](#) (Snowy River LEP 2013), as per instruction in section A1 on page 2 of the DCP.

We note in [Part 8 – Growth Areas](#) of the Snowy River LEP that 'development consent must not be granted' unless they comply with the conditions outlined in the relevant DCP and / or a Master Plan for the land.

The review also extended to an examination of the Snowy Mountains Special Activation Precinct (SAP) delivery documents currently on exhibition:

- [Draft Jindabyne Development Control Plan](#)
- [Draft Snowy Mountains Delivery Plan](#)
- [Draft Alpine Development Control Plan](#)
- [Draft Alpine Community Participation Plan](#)
- [Discussion Paper](#)

And the associated documents:

- [Snowy Mountains Special Activation Precinct Master Plan](#)
- [Snowy SAP – Summary of Delivery Documents](#)
- [Snowy Monaro Local Strategic Planning Statement](#)
- [Snowy Monaro Development Application Checklists](#)

Our review also draws on information provided under the following plans, strategies, and legislation:

- [NSW Connectivity Strategy](#)
- [Telecommunications in new developments \(TIND\) policy](#)
- [Information for new property buyers and occupants](#)
- [Information for developers](#)
- [Statutory infrastructure provider \(SIP\) regime](#)
- [Statutory infrastructure provider register](#)
- [Telecommunications Amendment \(Infrastructure in New Developments\) Act 2021](#)
- ['Telecommunications in New Developments' factsheet](#)

We acknowledge the purpose of the Jindabyne DCP (section A2, page 2) is 'to support the Snowy River LEP 2013 and build on the aims and objectives of the Snowy Mountains Special Activation Precinct Master Plan (DPE, 2022)', along with the aims to:

1. define development standards that deliver the outcomes desired by the community and Council,
2. provide clear and concise development guidelines and desired future character statement for various forms of development and site specific precincts,
3. encourage innovation in design and development by not over-specifying development controls,
4. expedite development approvals by providing clear direction on Council's intent and criteria, and
5. provide certainty of development outcomes for developers and the community.

As outlined in the introduction, our review focused on ensuring provisions for adequate housing, childcare and digital connectivity in new developments that will be guided by the DCP.

Housing

Adequate housing is the cornerstone of community stability and economic growth. As we work towards enhancing regional development, we recognise that housing availability and affordability are critical factors influencing population growth and attracting a skilled workforce. By ensuring access to secure and suitable housing, we contribute not only to the well-being of individuals and families but also to the overall stability and growth potential of our communities.

We commend the inclusion of housing within the Guiding Principles that underpin the DCP (section A2.1, page 2):

- Foster residential uplift in the Jindabyne Growth Precinct to boost available housing stock and enable affordable, low-cost, and social housing choices that cater for a variety of household types suitable for residents, seasonal workers, and short-term visitors.

We also acknowledge the following provisions in the DCP that support the development of housing:

- Section B14.1 General subdivision requirements, page 74, Objective O3 - Encourage environmentally acceptable residential subdivision and dwelling construction **that supports the diversity of housing choices required by new and existing residents.**
- Section C1.1.2 Desired future character (ILP), page 90 - Jindabyne will grow to **accommodate the increasing demand for housing**, tourist accommodation and retail offerings to support year-round tourism. The Jindabyne Town Centre Growth sub-precinct will support this change, **providing the opportunity for a range of housing types, sizes and affordability**, and an increase in the number of dwellings within walking distance of active and public transport, employment, and amenities.
- Section C1.1.4 Residential development, page 93, Objective O4 - Provide for dwellings to be adaptable to facilitate people living in a dwelling through different stages of life.
- Section C2.2 Residential development, page 132, Objective O1 - Provide a mix of housing typologies **to cater for increasing demand for affordable and diverse housing**, seasonal patterns, and demographic needs.
- Section C2.2 Residential development, page 132, Controls C1 - Enhance the diverse socio-economic mix through **provision of a variety of dwelling types and affordable housing options.**
- Section C2.2.1 Residential typologies, page 132 - Development within the Jindabyne Growth sub-precincts (with the exception of Leesville) is to include a low to medium density dwelling typologies.
- Section C2.2.3 Higher yield residential development, page 137, Objectives:
 - O1 - Utilise higher yield residential typologies to reflect the desired future character where a greater level of density provides a range of housing typologies and choice.
 - O2 - Support housing affordability through more compact dwelling sizes, whilst maintaining amenity, privacy, and access to quality outdoor private space.
 - O3 - Provide a range of housing formats that allow for intergenerational living over multiple levels, aging in place and options for secondary dwellings.

Upon review of the DCP, we believe considerable effort has been made to support the inclusion of a diversity of housing options in future developments guided by the Jindabyne Development Control Plan. The inclusion of housing in the Guiding Principles of the DCP underscores the commitment to fostering residential uplift in the Jindabyne Growth Precinct. This commitment aims to boost available housing stock and facilitate affordable, low-cost, and social housing choices catering to a diverse range of household types, including residents, seasonal workers, and short-term visitors.

RDASI also acknowledges several provisions within the DCP that explicitly support housing development, emphasising environmentally acceptable subdivision, diversity in housing choices, adaptability for different life

stages, and the provision of affordable and diverse housing typologies. These considerations align with the broader goals of enhancing the socio-economic mix and ensuring that housing options meet the evolving needs of the community within the Jindabyne region.

Childcare

Childcare facilities play a crucial role in regional developments as they support:

- **Workforce Participation** - Accessible and quality childcare enables parents, particularly mothers, to participate in the workforce. This, in turn, supports economic growth in the region by providing a skilled and engaged workforce.
- **Attracting and Retaining Talent** - Well-developed childcare infrastructure makes a region more attractive to families and can be a deciding factor for people considering relocating to regional areas.
- **Early Childhood Development** - Childcare centers provide a structured environment for early childhood education and development, essential for building a strong foundation for children, and for promoting cognitive and social skills that contribute to their overall well-being.
- **Support for Working Families**: Childcare services assist working families by providing a safe and nurturing environment for children while parents are at work.
- **Gender Equality** - Accessible childcare contributes to gender equality by allowing both parents to balance work and family responsibilities more effectively, which can help break down traditional gender roles and promote equal opportunities in the workforce.
- **Community Engagement**: Childcare facilities often serve as community hubs, bringing parents and families together, fostering a sense of community, encouraging social interaction, and creating a supportive environment for residents.
- **Educational Opportunities** - Quality childcare programs contribute to the educational development of children, preparing them for school and beyond. This investment in early education enhances the human capital of the region.
- **Economic Impact** - The childcare sector contributes to the regional economy by creating jobs and supporting local businesses.
- **Social Inclusion** - Childcare facilities provide opportunities for children from diverse backgrounds to interact and learn together, offering early exposure to diversity which can foster social inclusion and understanding within the community.
- **Family Well-being** - Adequate childcare support contributes to the overall well-being of families. It reduces stress for parents, enhances work-life balance, and ensures that children are in a safe and enriching environment.

Unlike housing, childcare was only referenced once, and was done so in relation to minimum parking requirements for centre-based childcare facilities (page 27). The term 'child care' was noted on page 111, however, this reference related to an existing facility in Jindabyne South.

We acknowledge the development of 'Centre-based child care facilities' and provision of 'Home-based child care' facilities is 'permitted with consent', under relevant Zones, outlined in the [Land Use Table](#) in the [Snowy River Local Environmental Plan 2013](#) and that the DCP must be read in conjunction with this document. However, we cannot find reference to any conditions that ensure adequate childcare facilities will be provided as part of future developments guided by the DCP or in any of the delivery documents, or additional supporting documents that were examined as part of this review.

Quality childcare services are essential to support economic growth and the overall prosperity and liveability of regional communities. Provisions for adequate childcare facilities to meet the needs of growing regions should be incorporated into all new developments and underpinned by guiding plans and strategies.

The Department of Social Service's document '[Guidelines for the Planning and Development of Child Care Facilities](#)', highlights the need for local governments to 'Develop child care friendly development controls' (page 20). The framework also recognises 'existing constraints and provides evidence-based, easy to use checklists to help local government build internal capacity to strategically and systematically plan, and work in partnership with a range of stakeholders, to improve the availability of child care', (Preface, i).

We do not believe the Jindabyne DCP or associated delivery documents addresses the need for government bodies and / or developers to ensure adequate childcare services are provided as part of new developments within the Jindabyne area. We implore the Snowy Monaro Regional Council to incorporate provisions into the DCP that ensure additional childcare facilities will be developed to accommodate the population growth that will be supported by new developments under the DCP.

Digital Connectivity

In an era defined by digital transformation, reliable internet and phone connections are indispensable for regional development. We understand that digital connectivity is not just a convenience but a catalyst for economic growth, education, and community well-being. By advocating for robust digital infrastructure, we aim to bridge the digital divide, unlock new opportunities for businesses, and provide residents with access to the information and services necessary for success and safety in the modern world.

Reliable connections to both internet and phone services are ongoing issues for regional areas, including new developments. In June 2023, RDASI held a [Digital Connectivity Forum](#) to discuss these issues with local council representatives and major telecommunication representatives from across the RDASI region. It was highlighted during the event and via post event feedback that the issues generally occur as there is a breakdown in communication and awareness of role and responsibilities.

Further to this, RDASI conducted a survey to inform a [submission](#) to the Telecommunications Deployment Policy Section of the Department of Infrastructure, Transport, Regional Development, Communications, and the Arts, to provide feedback on the possible amendments to the Telecommunications in New Developments (TIND) Policy, to improve mobile connectivity in new developments, and other measures to improve fixed voice and broadband services.

Results from the survey indicated that 52.94% of regional respondents encountered risks, including emergencies, and missed opportunities, and 88.24% reported difficulties in business operations, managing property, and staying connected with family and friends due to inadequate mobile coverage in new developments.

With a solid understanding of the importance of reliable internet and mobile connectivity, RDASI have conducted a thorough search of the DCP and each supporting document using the following key terms:

- Digital
- Telecommunication
- Mobile
- Internet
- Connectivity

- Communication

The occurrences for each, or lack thereof, are highlighted in bold blue text below.

[Jindabyne Development Control Plan](#)

Pg. 76 - B14.1.5 Provision of services

‘C2. The applicant must provide fixed **digital connectivity** to each allotment.’

[Snowy River Local Environmental Plan 2013](#)

Part 7 Additional local provisions – 7.9 Essential services

Development consent must not be granted for development unless the consent authority is satisfied that any of the following services that are essential for the development are available or that adequate arrangements have been made to make them available when required—

- (a) the supply of water,
- (b) the supply of electricity,
- (c) the disposal and management of sewage,
- (d) stormwater drainage or on-site conservation,
- (e) suitable vehicular access.

Note exclusion of internet and phone services.

[Draft Snowy Mountains Delivery Plan](#)

Pg.12 - Role of Regional Growth NSW Development Corporation Services - Physical and **digital** enabling infrastructure, utilities, and services.

Pg. 28 - 1.8 Proposal referrals and concurrences:

Connections to utilities and services including:

- a. water
- b. wastewater
- c. electrical
- d. **telecommunications** and
- e. other utilities and services as required such as gas, hydrogen reticulation (including future hydrogen), recycled water etc.

Pg.87 - 3.17 Utilities and services

Objective - PC59 Adequate services available

Solutions:

- A59.1 Development sequencing and staging is consistent with infrastructure provision and capacity for the Precinct.
- A59.2 Development makes provision for and connects to the key infrastructure in accordance with Council’s relevant guidelines and policies, including as required:
 - a. water

- b. wastewater
- c. electrical
- d. **telecommunications**

[Draft Alpine Development Control Plan](#)

Pg.96 - Telecommunication upgrades are also required as **limited mobile and internet service** at the Sub region impacts the current visitor experience.

[Snowy Mountains Special Activation Precinct Master Plan](#)

Pg.3 - Infrastructure investment - Investment into enabling infrastructure is made by the NSW Government into roads, water, power, **digital connectivity**, and other necessary infrastructure to support the precinct.

Pg.147 - 8.1 Utilities and services

Aims

Growth planned for Jindabyne, requires upgrades and extensions to facilitate redevelopment. This may include upgrades to potable water, sewer, and stormwater systems, as well as to **telecommunications**, electrical and gas infrastructure.

Performance Criteria

C. Development within the sub-precincts must have access to water, wastewater, **telecommunications (including digital connectivity)**, energy (electricity/gas) and drainage infrastructure.

Pg.256 - 13.2 Utilities, services, and infrastructure

Aims

Provide world-class **digital connectivity** in the Alpine Region.

Performance Criteria

A. Development within the site must have access to water, wastewater, **digital connectivity and telecommunications**, energy, and drainage infrastructure.

[Snowy Monaro Local Strategic Planning Statement](#)

Pg.52 & 53 - Planning Priority 12 - Capitalise on Growth and Change by Preparing for New Business and Population

*Over the next 20 years, **communications** infrastructure will become increasingly important to the region. While it is noted Council only has a limited role in delivering **communications** infrastructure it is imperative Council has a strong policy regarding the implementation of new and improved communications technology in the region. Council must also clearly and strongly advocate for improved **communications** infrastructure throughout the Snowy Monaro region and provide flexibility for new innovative technologies.*

*The use of **digital** communications platforms (high speed broadband, wide **telecommunications** networks, and micro **telecommunications** networks) to promote economic development and tourism and deliver education, tele-health and other services to the community will accelerate. The extensive use of **digital** platforms by emergency services providers and Council during recent COVID-19 pandemic, bushfire and major flooding events in the Snowy Monaro has highlighted this. The increased application of artificial intelligence in workplaces over the next 20 years will also require high quality **digital** networks if local economies are to thrive.*

*The availability and use of high-speed **digital** technology will underpin the promotion of the community's economic, social, tourism and environmental land use needs over coming decades throughout the Snowy Monaro region and be vital to future business growth.*

Pg. 54 - Council Will

- Advocate for improved communications technology in the region.
- Advocate for the implementation of new and innovative **communications** technology throughout the Snowy Monaro Region.

[Snowy Monaro Development Application Checklists](#) (residential / non-residential & subdivision) each checklist identifies services as: water, sewer, electricity lines, gas, telephone, and stormwater. **Note there is no internet or digital connectivity included in the checklists.**

RDASI acknowledges the inclusion of 'The applicant must provide fixed digital connectivity to each allotment,' on page. 76, under 'B14.1.5 Provision of services' in the [Jindabyne Development Control Plan](#). We note, that this clause when read in conjunction with the [Statutory Infrastructure Provider Regime](#), which states '*Statutory Infrastructure Providers (SIP) SIPs have an obligation to connect premises in their service areas to their telecommunications networks, and supply wholesale services. The wholesale services must allow the retail provider to supply 'qualifying carriage services', which are broadband services with peak download and upload speeds of at least 25/5 Mbps. On fixed-line and fixed-wireless networks, the wholesale services SIPs supply must also be able to support voice services*', would under the most circumstances ensure each lot can be connected to a reliable phone and internet service. However, instances where a fixed line or fixed wireless connection is not viable or may be delayed for a long period of time, and an alternative carriage service is supplied, such as a satellite, under the [Statutory Infrastructure Provider Regime](#) (Part 19, 2A) alternative carriage service may not be required to provide end-users with the ability to make and receive voice calls.

Therefore, to protect the end-users right to access reliable internet and phone services, we implore the Snowy Monaro Regional Council to extend the existing clause to include the provision that if / when a fixed line or wireless connection is not possible, infrastructure to support carriage services that can be used by end-users to make and receive voice calls; and access broadband services with peak download and upload speeds of at least 25/5 Mbps, or to similar effect.

In addition to this, we recommend that 'infrastructure to support carriage services that can be used by end-users to make and receive voice calls; and access broadband services with peak download and upload speeds of at least 25/5 Mbps,' or similar is added to the [Snowy Monaro Development Application Checklists](#).

In Summary

RDA Southern Inland works across a region encompassing 44,639 square kilometres, including seven local government areas in the south-east of NSW, home to over 210,000 Australians. Our mission is to support the development of this area of regional Australia, acting as a conduit between residents, business owners and government agencies, providing a connection point for growth, prosperity, and liveability. We drive workforce development, investment, and innovation through collaboration, communication, advocacy, and the facilitation of regional projects. We strive to disseminate information and resources to our community members and provide unbiased support.

I thank you for the opportunity to provide feedback on the Draft Jindabyne Development Control Plan (DCP) and commend the Snowy Monaro Regional Council team on the comprehensive provisions that have been included to ensure housing options meet the evolving needs of the community as the Jindabyne region grows.

We hope our review of childcare facilities and internet and phone service connections, and our associated recommendations are considered and actioned. We believe that these changes will assist to ensure our community members needs are met, and will significantly contribute to the overall prosperity, liveability, and resilience of both the Jindabyne and wider RDASI regions.

Kind regards,



Carisa Wells
CEO and Director of Regional Development