

From: [New England Greens](#)
To: [Council](#)
Subject: Further comments on the Armidale Regional Plan 2040
Date: Monday, 14 December 2020 5:01:31 PM
Attachments: [ARC ideas by Theme 2040.pdf](#)

To Whom it May Concern,

Thank you for the opportunity to provide additional comments on the Armidale Regional Plan 2040, noting that: *"Any comment received on the Final Report during the public exhibition period is to inform Council staff in the preparation of the report on the actions that deliver the objectives of the Community Strategic Plan (CSP)."*

Ideas submitted in January 2020 are still highly relevant for the Community Strategic Plan

Attached are our ideas submitted on 15 Jan 2020 in the hope they can be reconsidered in the preparation of the report on the Community Strategic Plan.

Mainly an Information-gathering Exercise that will inform the LSPS

The Regional Plan 2040 appears to have been mainly an information gathering exercise by out-of-town consultants; they had to assemble a good deal of information that locals would already know. The assembled information will nonetheless be very useful in preparing the documents envisaged by the Local Strategic Planning Statement (LSPS).

A comprehensive planning strategy needed to manage inconsistencies and contradictions, clarify issues and inform the LSPS. A couple are listed below:

A) should development be permitted in areas that do not meet National Air Quality Standards?

Some information on health was provided in the NE Greens' submission: *"ABS statistics show that for 2016-18, male life expectancy in Greater Sydney was 82.2 years, compared to 78.6 in New England North West, a difference of 3.6 years. Possible reasons are greater difficulties accessing health services and poor air quality (one residential area of Armidale had 63 exceedances of the National Air Quality PM2.5 Standards in 2018, compared to virtually none in Sydney)."*

This raises the question about the advisability and legal implications of encouraging people to live in central Armidale until National air quality standards can be achieved. Would ARC encourage people to drink from a local water that did not achieve National water quality standards?

Page 89 of the Regional Plan 2040 states: *"3. Encourage people to live in the CBD"*. Some qualification is required about if this should happen only after Armidale's air pollution is reduced to levels with minimal health impacts. The only mention of the problem in Regional Plan 2040 is on p77: Environment and health – monitor air quality, reduce wood smoke pollution. This ignores the seriousness of the problem, especially the multiple exceedances of National Air Quality standards.

By contrast, a 'Measure of Success factors /outcomes' for E1 on page 34 of ARC's Delivery Program is *'Achieve National Air pollution targets by 2020'*. This is in keeping with the Community Strategic Plan that state Of particular concern to some was wood-smoke pollution, and the impact this is having on the local air quality, which is said to have exceeded National Air Quality Standards on multiple occasions in recent times."

National Air Quality Standards were not met in 2020, so urgent action is needed to set up the Air Quality Working Group and encourage partnerships with UNE and local health professionals to develop effective strategies that can be put in

place by winter 2021.

B) encouraging development close to major employers such as UNE

Similarly, a Strategic Initiative of the ecoARC Transport policy is: "*Revise LEPs to encourage residential development within easy cycling and walking distance of major employment and business areas, and facilitate residential living within the CBD of Armidale*" Yet the Regional Plan 2040 has no obvious suggestions about encouraging residential development close to Armidale's major employer - the University of New England. It shows zonings in much earlier plans dating from 2008 onwards that were simply copied into the Regional Plan.

C) Many other issues are outlines in our submission as well as other relevant documents, including the adopted EcoARC plan

Clear Plans & Targets needed to create a comprehensive planning strategy

As noted in our previous submission:

"The MasterPlan needs clear targets and performance indicators. All effective plans focus on targets that can be achieved, starting with the issues and targets where action by council would provide the greatest benefits."

We look forward to seeing the above ideas incorporated into the report being prepared on the actions needed to *deliver the objectives of the Community Strategic Plan (CSP)*

Your sincerely
Elizabeth O'Hara,
Convenor,
New England Greens Armidale Tamworth.

----- Forwarded message -----

From: **New England Greens** <greens.ne@gmail.com>
Date: Wed, 15 Jan 2020 at 20:03
Subject: NE Greens contribution to Armidale Regional Plan 2040
To: <margaret@plancom.com.au>
Cc: External link <council@armidale.nsw.gov.au>

Our submission is attached.

Thank you for considering this submission from New England Greens.
We look forward to continued engagement in this process.

Your sincerely
Elizabeth O'Hara,
Convenor,
New England Greens Armidale Tamworth.