

**From:** [noreply@ecq.qld.gov.au](mailto:noreply@ecq.qld.gov.au)  
**To:** [LG CC Submissions](#)  
**Subject:** (56890) Livingstone Shire Council and Rockhampton Regional Council - External Boundary Review - Rockhampton Regional Council  
**Date:** Monday, 4 July 2022 2:38:28 PM  
**Attachments:** [ECQ-4-july-2022.pdf](#)

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Online submission for **Livingstone Shire Council and Rockhampton Regional Council - External Boundary Review** from **Rockhampton Regional Council**

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### Submission Details

**Name:** Rockhampton Regional Council

**Privacy preferences:** Publishing your submission and your name

**Submission text:**

**File upload:** ECQ 4 july 2022.pdf (236.5 KB)

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4 July 2022

Our Ref: 5872  
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Mr Pat Vidgen PSM  
Electoral Commissioner of Queensland  
Electoral Commission Queensland  
GPO Box 1393  
BRISBANE QLD 4001

Dear Pat

### **Northern Boundary Review - Response to Livingstone Shire Council Northern Boundary Review Submission**

I am writing to provide Rockhampton Regional Council's (RRC) response to the Livingstone Shire Council (LSC) Boundary Review submission dated May 2022.

RRC stands by the solid evidence presented in our own submission. However, on review of the LSC submission, I feel a response is necessary to ensure the Boundary Review proceeds appropriately and is able to answer definitively the question "Which Council can deliver the best outcomes for the Northern Suburbs?".

RRC's position has always been that the three northern suburbs of Glenlee, Rockyview and Glendale (the Northern Suburbs) are part of Rockhampton. Our submission lays out the logical and evidence-based reasons why RRC is in a better position to continue to provide the services that are needed now and the planning that is needed for the future growth and prosperity of the Region.

By contrast, LSC have chosen to minimise or avoid discussions about what is best for the Northern Suburbs, and instead covers the relationship between the two Councils. While RRC acknowledges that there is a symbiotic relationship between our Councils, what is being decided in this Boundary Review specifically concerns Glenlee, Rockyview and Glendale - not the more general impacts and influences we have on each other.

The information in this letter covers the main headings in the LSC submission and highlights areas we believe do not provide adequate or timely evidence, which must be taken into consideration when making a decision about the northern boundary of Rockhampton.

### **Community of Interest**

The LSC submission does not provide evidence demonstrating that the Northern Suburbs are a community of interest with respect to the Livingstone Shire LGA. Instead, LSC puts forward the concept that the broader region is, in effect, a single community of interest and supports this position with general boat registration data and anecdotal weekend observations of community facility usage. This does not provide a compelling argument for why the suburbs involved should be retained by LSC.

In contrast, the RRC submission provides recent movement data demonstrating the solid service, employment and infrastructure usage linkages between the Northern Suburbs and Rockhampton. More convincingly, our submission also details the impacts that future growth will have as this community of interest grows and strengthens.

The LSC submission dedicates a significant amount of space to the results of two community surveys regarding the Boundary Review. Selected analytics present, in effect, two opposing positions: that the majority of LSC residents are opposed to a change in boundary and that a majority of LSC residents do not actually care about the issue.

However, results from both surveys actually do demonstrate that this issue epitomises a community of interest with the results divided along distinct geographic lines. Continuing the pattern from past surveys, residents of the Northern Suburbs definitively voiced their preference to be part of RRC primarily because they view their communities as being part of Rockhampton.

## Financial sustainability and resource capability assessment

The LSC submission references a number of financial assessments, including several Queensland Treasury Corporation assessments, as well as a review for which LSC engaged the AEC Group.

It should be noted that some of the suppositions within the LSC submission are based on older reviews, not the more current QTC Financial Assessment or even the AEC report from 2020. It must also be pointed out that the LSC submission document accepted by Livingstone Shire Council differs from the document available on the ECQ website in that discussion of AEC findings, including statistics and graphs, have been removed from the ECQ document. Without access to the AEC report, we cannot comment on the suppositions put forward regarding financial impacts.

The recent QTC financial assessment notes: “(F)orecasts indicate operating performance, leverage and debt serviceability metrics would remain within preferred benchmark levels indicating a level of resilience.” The LSC submission states that this assessment “does not acknowledge the current and emerging financial headwinds” but provides no detail of what those actual “headwinds” are or their specific impacts. There is discussion about potential risks mentioned in the commissioned AEC report, but this is qualified with the statement that the “scenarios are not directly modelled”.

The LSC submission goes on to state that the latest QTC assessment “does not model the potential strategic impacts on LSC due to the loss of the growth potential in the transfer suburbs”. LSC’s submission does not reference the size or location of growth within the LGA. Our submission outlines residential land development activities in the Livingstone LGA and notes that this occurs along the coast and not in the Northern Suburbs. LSC’s lot approvals increased by 148% in 2021, more than three times the increase of Rockhampton LGA, and their urban lot approvals constitutes 56% of Central Queensland’s total approvals for 2021. Assessment of the financial impacts of decisions about the boundary must consider future growth across the LGAs affected.

Given the lack of evidence and differences between sources, the financial assumptions on which the LSC submission is founded must be questioned. As we note in our submission, there are also discrepancies between forecast data LSC supplied for the recent QTC report and the 2020-21 LSC Annual Report. By contrast, the RRC submission provides an evidence-based analysis of the financial impacts on both RRC and LSC. We acknowledge the short-term impacts for LSC and have outlined our intention of providing support to LSC while in transition, should the Northern Suburbs transfer proceed.

## Town planning assessment

The LSC submission states that potential residential land contained within the Northern Suburbs will not be required until 2041, and that “the current boundary presents no town planning constraint for Rockhampton”. While we do not dispute the forecast land requirements, we do dispute the position that the boundary location presents no constraints for Rockhampton.

The LSC submission fails to recognise that planning must happen now in order to ensure positive outcomes in the future. Community planning must be well thought out and infrastructure to support development must be planned strategically to ensure local governments undertake their financial planning responsibly.

The LSC submission indicates that they are likely to retain the status quo (rural residential development) into the future. By contrast, RRC is already undertaking projects that will support growth to the north. The North Rockhampton Sewage Treatment Plant is an example of a “once in a generation” infrastructure project that will not only manage growth but facilitate development that simply could not proceed without it.

We also recognise that regardless in which LGA the Northern Suburbs sit, there will be an impact on RRC road, water and sewerage infrastructure, and categorically reject the view that the current boundary “presents no town planning constraint”. Advice provided for the Boundary Review by the Queensland Department of State Development, Infrastructure, Local Government and Planning notes that “(e)xpansion north into Glenlee and Rockyview is the logical area of northern growth for the City of Rockhampton.” Planning for this growth is very much the ongoing responsibility of RRC.

It should be noted, RRC is currently grappling with the effects of insufficient planning that resulted from fragmentation of land in Parkhurst. We understand what is required for development in the Northern Suburbs to seamlessly knit into the fabric of Rockhampton and avoid these pitfalls in the future. Planning simply cannot wait until land is needed in 2041. It is the responsibility of local governments to ensure that growth is planned efficiently. Queensland Local Government Regulation specifically notes that local government boundaries should be drawn in a way that “helps in planning and development for the benefit of the local government area, and the efficient and effective operation of its facilities and services and has regard to existing and expected growth.”

And finally, the LSC submission makes the unsubstantiated statement that the “change (to the boundary) would be detrimental to regional economic development” and provides no evidence to support this view. This short-sighted and unfounded claim indicates that LSC has no real understanding of what would best serve the residents, ratepayers and developers of the Northern Suburbs. The RRC submission provides evidence of the benefits that efficient planning would provide, as well as the risks to potential increased costs for developers if the boundary is not changed. In short, RRC understands the Northern Suburbs and has the planning and willingness to invest in the area to safeguard their interests, as well as providing substantial benefits to the Region.

We welcome the outcome of the review and trust that the process will take the above into consideration when assessing the submissions. As always, we are available to respond to any requests for additional details regarding RRC’s submission or the issues highlighted in this letter.

Yours sincerely



**Evan Pardon**  
Chief Executive Officer