

Mr Pat Vidgen PSM  
Local Government Change Commissioner  
GPO Box 1393  
Brisbane Qld 4001

Dear Mr Vidgen,

## **LOCAL GOVERNMENT EXTERNAL BOUNDARY REVIEW: LIVINGSTONE AND ROCKHAMPTON COUNCILS**

Thank you for the opportunity to respond to Rockhampton Regional Council's (RRC's) supplementary submission to your commission's review of a proposed external boundary change between Livingstone (LSC) and Rockhampton councils.

Our supplementary submission is structured to respond to the matters raised by Rockhampton:

- Community of Interest
- Planning for growth
- Financial impacts

### **Community of Interest:**

RRC are seeking to confine community of interest considerations to just the three localities the subject of your review. It is impossible to do this without ignoring very real financial impacts on the balance of LSC ratepayers. Minister Hinchcliffe supported the broadening of the community of interest to the whole shire in his letter to LSC dated 25 August 2020.

RRC places great weight on the daily movement of residents. LSC has never sought to deny that there is a strong relationship and in fact dependency on Rockhampton for services, employment and regional level recreation. It is a major regional centre, so this is to be expected. However, this point holds true for almost all LSC localities that rely on the larger regional centre for services. If this was a genuine motivation for RRC, then you might expect more dependant communities such as Nerimbera to be included in their campaign.

The three impacted localities receive no direct trunk infrastructure services from Rockhampton apart from a small number of properties in Rockyview (<10) that are connected to sewerage. The major road connection is a state-controlled road (Bruce Highway) and water is provided from LSC's Caves Water Scheme.

### **Planning for Growth:**

Both councils agree there will be no demand for urban scale development in these localities for at least 20 years. The RRC submission freely exposes that LSC lot approvals increased by 148% in the year to December 2021 compared to 53% at RRC. That and some periods of negative population growth in Rockhampton in recent years must call into question the medium series growth forecasts used by RRC (25,000 residents by 2041). The low series projection would result in only 6,176 new residents and the demand for ~2,470 dwellings in RRC until 2041. Assuming half go to Parkhurst that will generate an additional demand for 1,235 new dwellings. The approved (but not yet commenced) Ellida development in Parkhurst has a planned yield of over 1800 dwellings.

Both councils agree there is no demand for growth in this area for at least 20 years; as time and future demand forecasting indicates the need to include new planning outcomes for the three suburbs, this will be done.

The strategic planning horizon for LGA statutory planning schemes (and associated Local Government Infrastructure Plan) is 10 to 15 years. This recognises that 10 to 15 years is more than sufficient time to plan for and deliver the majority of trunk infrastructure required to accommodate forecast development. It also recognises the uncertainty and risk of placing too much weight on forecasts beyond that horizon. LSC acknowledges that designating alignments and protecting routes for future transport, water and sewerage infrastructure is important. RRC already has plans for trunk infrastructure for development up to and including the areas immediately south of the current local government boundary. They will clearly inform the location of future trunk infrastructure for servicing areas beyond the current boundary.

Critically, any speculative 'build it and they will come' strategy now would clearly constitute 'gold plating' when any real demand is still at least 20 years away. LSC is not questioning the need to upgrade or replace treatment infrastructure as required, but for growth beyond the strategic horizon the most appropriate strategy is to make treatment processes scalable. This allows optimal delivery timing and facilitates the benefits of future technology advances.

The only planning imperative for LSC in the near term is to ensure the large rural allotments remaining in Glenlee are not further fragmented, thereby impeding future, efficient urban development. There are a number of ways of securing such an agreement between RRC and LSC that do not require a boundary change.

It is also worth noting that, at the time the boundary review was commenced, LSC was developing terms of reference for an economic development study to maximise the economic opportunities from this northern area. This intent recognised that the completion of the Rockhampton Ring Road and Rookwood Weir as well as the proximity to the north-south rail line and Bruce Highway offers opportunities.

For these reasons LSC refutes the suggestion that it is not appropriately considering growth and future planning for these areas.

#### **Financial Sustainability:**

For reasons not immediately obvious, RRC has taken an unusual interest in work commissioned by LSC in 2017 (Orion Consulting) and 2020 (AEC). LSC stands by the outcomes of the earlier studies, but now defers to the most recent financial analysis commissioned by your office and undertaken independently by Queensland Treasury Corporation (QTC).

QTC's work is indisputable and confirms earlier work commissioned by LSC that the boundary change will have a significant financial impact on LSC. As modelled by LSC this impact will be compounded by emerging cost increases and can still compromise future financial sustainability.

#### **Other:**

RRC has suggested possible remedies in the event the boundary review does not proceed;

1. RRC will seek compensation for services supplied by RRC to the three localities, and that the State protect the area from inappropriate development by designating a Priority Development Area.
2. Consider re-amalgamation of the two councils to the pre 2014 footprint.

With the exception of commercial arrangements for the provision of services such as water and waste it is not clear how RRC would seek to levy charges and how the impacts would be calculated. By way of comparison, it would seem an extraordinary step and an incredible precedent to allow major regional cities or Brisbane to charge adjacent local governments for infrastructure impacts or provision of services.

The Queensland Government's policy on de-amalgamation necessitated that the local government boundaries return to those existing pre-amalgamation in 2008. The residents of LSC have borne an incredible financial burden to re-establish LSC resulting from a disproportionate assignment of debt, costs and risks. The "light" is just starting to appear for LSC Council and residents post de-amalgamation. Any suggestion that re-amalgamation is being actively considered would be strongly opposed by LSC and the community

LSC accepts that of the residents in the three suburbs that responded to the commission's community survey, the majority may well wish to transfer to RRC. However, the percentage of those seeking to change is reducing, which can also be inferred by the data stating that one-third of the affected residents did not participate in the survey.

Based on the survey results, Council believes there is no overwhelming imperative to change. The current boundary will continue to provide residents in the area appropriate standards of service and allow both Councils the reasonable opportunity to remain sustainable and have the capacity to grow.

We thank the Commission for the opportunity to respond to the comments of RRC and make additional comments. We hope and trust this additional information will be given proper consideration in the review. Council is happy to clarify or provide additional information if it will assist the work of the Commission.

Yours sincerely,

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Andrew Ireland  
MAYOR