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Submission: Draft Hunter Regional Plan 2041

The Tomaree Ratepayers and Residents Association Inc (TRRA) represents the community on a range of issues which affects the Tomaree Peninsula in Port Stephens LGA, including planning and development, economic development, cultural infrastructure and resources, the built and natural environment, tourism and other grass roots issues.

Introductions (pp 1-14)

The early pages of the draft Plan explain the 'big picture' objectives and intentions, at a higher level than the specific objectives and strategies in Part 2. They also set out the vision and new approach, including how the Plan fits into the wider planning framework. But they also reveal much about the Government's underlying agenda.

Regional Plans are required to be reviewed at least every 5 years.

The Draft Plan adopts the 7 United Nations Sustainable Development Goals, and sets out 4 Hunter Regional Plan Principles - Growth, Community, Resilience and Equity (P9)

While these are all welcome declarations of intent, they can easily be undermined by more specific detail later in the Plan, and by the practical actions and decisions of all levels of government whether directly in implementing the plan; in other changes to the planning system, or in other policy areas.

We are also concerned that there is no separate Principle of environmental protection and ecological sustainability. Incidental references to 'net zero emissions' and to 'weaving nature into our towns and cities' in two of the other Principles are tokenistic and reflect a serious imbalance in objectives and priorities.



Initiatives to date to implement the 2036 plan (released in 2016) include (P10):

- the Greater Newcastle Metropolitan Plan 2036
- a memorandum with the Hunter Joint Organisation of Councils (HJO)
- the Greater Newcastle Urban Development program
- the draft Hunter Expressway Strategy.

Missing from the draft report is critical information on ‘how much’ growth is being planned for. The best ‘clue’ lies in the Greater Newcastle Urban Development Program (GNUDP). While there doesn’t appear to be a publicly available ‘Program’ as such, there is an Annual Report on the GNUDP from the Hunter UDP Committee – a grouping of Councils, Government Agency and Development Industry peak bodies, chaired by the unelected Hunter and Central Coast Development Corporation (HCCDC).

The latest published Annual Report (for 2018-19) is dated February 2020, and contains information on housing approvals and completions, discussion of the development ‘pipeline’ and of future growth priorities and areas.

If this is the latest available indication of what the Hunter Regional Plan is planning for, then it is significantly out of date, not only in relation to development activity in the last 2 years, but also in failing to take account of the effect of the pandemic. International border closures and internal migration patterns are likely to significantly affect demand for housing and employment land well into the future, potentially justifying a major change to the very pro-development emphasis in the current UDP.

The Draft HRP FAQs say that population projections based on 2021 Census will be available early 2022.

Without more specific forecasts and targets for population and employment growth, the overall outcome of the Plan is likely to be identification and potential release and servicing of as much development land as the various constraints allow. While this clearly reflects the objectives of the development industry, and of a longstanding ‘growth and development’ mindset in all levels of government, we submit that it is not consistent with a genuine commitment to sustainable development, which must start with a community consensus vision of the future of the Hunter Region, including express recognition of its long-term ‘carrying capacity’. Without such a quantified vision, the expressed intention to ‘Build Back Better’ out of the pandemic will be no more than empty words.

An audit of 140 Planning Proposals to amend LEPs in the Hunter between 2016 and 2021 recommended place-based planning that integrates various planning directions. This now appears to be the direction the Government is taking with the Minister’s December 2021 Planning Principles, and proposed rationalisation of the multiple State Environmental Planning Polices (SEPPs).

From the diagram on p10, it is unclear what role remains for Local Environmental Plans (LEPs), which are the principal local land-use planning instruments under the EPA Act. The diagram suggests that Place Strategies for specific areas are the next level down from each Council's Local Strategic Planning Statement (LSPS), with Planning proposals that implement Place Strategies being encouraged.

The Department gave assurances in a recent webinar that there is no intention to remove or displace the role of LEPs, but it seems clear that one of the main intentions of all the many current planning reforms is to make new development easier and faster, either by facilitating changes to LEPs (e.g. to zoning) or by facilitating exceptions to the standards they contain (such as height limits). The Plan would benefit from a clearer statement about the continuing role of LEPs.

The Draft Plan sets out 9 'Big ideas' on p11 (which mostly match the list of 8 'key ideas' in the Plan Review FAQs)

What are the big ideas in the new draft regional plan?

- **Greater diversification** of employment, mining and energy generation lands to support economic renewal and innovation and open opportunities for renewal and change to new land uses.
- A new approach to how we **sequence planning for new land uses and infrastructure** to accelerate proposals that will support the vision and bring even greater public value.
- New pathways to **promote economic self-determination and greater recognition and respect of traditional custodians**, along with greater connection with Country and integrating Aboriginal cultural knowledge and practice into urban design and planning.
- Establishment of **net zero emissions as a guiding principle** for all planning decisions.
- A focus on creating a region made up of **15-minute mixed-use neighbourhoods** in various contexts, as a response to the new ways people live and work in light of the COVID-19 pandemic, including the value people place on local, vibrant neighbourhoods where most needs can be met within a 15-minute walk, bike or drive if you are in a rural area.
- **Emphasis on infill approaches** to growth over greenfield, the achievement of optimum densities in various contexts to make public transport and neighbourhood mixes successful, and the establishment of flexible land uses in new and existing neighbourhoods to allow communities to evolve over time.
- **A renewed focus on green infrastructure, public spaces and nature**, by drawing from the opportunities of a rapidly growing region to plan for a better future, using planning decisions to reinforce, enhance and improve quality of life.
- **Prioritisation of walking, cycling and public transport** in urban areas, towns and villages across the Hunter.
- **Reinforcing the importance of equity** so that people have greater choice in where and how they live, how they travel and where and how they work.

We generally welcome 'Big ideas' 3,4,7 & 9.

Idea 2 is potentially unwelcome given its emphasis on 'accelerate' – it will be important to clarify how the proposed 'sequencing' will work in practice (see below).

Ideas 5 & 8 are welcome aspirations but may not be practicable outside urban areas

Idea 6 (the equivalent 'Key idea' in the FAQ uses 'consolidation' in place of 'infill' – same concept). This 'idea' is welcome in principle but there is a risk it will be misused to support unacceptable built form outcomes, such as high rise in coastal towns. Infill is generally preferable to greenfield development for a number of good reasons, but infill

must be sensitive and appropriate for localities, and not 'one size fits all' imposition of higher density through built forms which change local character too much or too fast.

'Our Regional Vision for the Hunter - The leading regional economy in Australia, connected to and caring for Country, with a vibrant metropolitan city and sustainable 15-minute neighbourhoods at its heart.' (p14)



We note that this graphic suggests that at least 9 storey developments are acceptable in strategic centres – we challenge this assumption if it is intentional and applied to all strategic centres – some may accommodate high rise, others not – see our comments on housing supply later in this submission.

Part 1 – Making it happen (pp 15-20) = process

Part 1 of the draft is about how it will be implemented.

'An infrastructure-first and place-based approach will materialise the plan's vision and objectives into outcomes for the community.' (p16)

This is welcome in principle but the timeline graphic does not support the approach – it shows infrastructure *delivery* still coming after development starts

'Better coordination begins with a strong evidence base. Regular monitoring of land supply, dwelling production and demand will enable better decisions on urban renewal priorities, release of land for development and the infrastructure and servicing required to enable delivery.'

The urban development program is the NSW Government's program for managing land and housing supply and assisting infrastructure coordination in the Hunter. This program will be expanded to include all of the Hunter, using existing housing monitors as a basis for extension to all parts of the Hunter.' (p17)

See our comments above on the GNUDP. It seems the intention is to revise and expand the current UDP to apply more broadly to the entire Hunter region, and to all forms of development not just housing.

The Hunter Urban Development Program committee is clearly a very significant participant in the proposed new approach, but has an unacceptable structural 'bias' in favour of the development industry. There is no representation of environment or community groups on the Committee, and no obvious representation of environmental interests even from within government agencies (Environment, National Parks, EPA).

It cannot be assumed that Councils represent these interests – some may while others clearly have a growth and development agenda which needs to be balanced by voices unequivocally representing the wider range of values captured by the UN Sustainable Development Goals to which the draft Plan subscribes.

The 'brief' for the Committee outlined in the panel on p17 ('The Committee will ...') makes it clear that the Urban Development Program (driven by the 'lopsided' Committees) is currently all about growth – there is not even lip-service paid in this 'brief' to the other objectives and principles.

This clear bias is of particular concern as it seems Councils will be 'directed' to prepare Place Strategies (and modify LEPs?) so as to implement the targets and goals of the UDP.

The Draft Plan sets out a 6 step process for implementing the Infrastructure first and place-based framework' (p18)

Step 1. Plan for growth areas in the right ways through local strategies (p18)

'Councils' local strategic planning statements and other local strategies are essential to the vision and objectives of the Hunter Regional Plan. They identify the growth areas where future urban development should occur and provide for the detailed place-based planning that requires collaboration between public authorities and infrastructure providers. '

The draft plan appears to elevate the importance of the Council Local Strategic Planning Statements (LSPS) – although it is not clear whether it will be the LSPS or the UDP that is the major instrument for identifying growth areas.

It is also unclear whether and how an area identified as having potential for significant growth could be 'de-listed' if and when either infrastructure or environmental constraints subsequently rule it out in whole or part. A current example is the proposed Kings Hill development north of Raymond Terrace, for which the concept plan has recently been refused by the JRPP (now subject to appeal).

The draft plan appears to elevate the role of Local Aboriginal Land Councils (LALCs) to the same level as Councils. It is unclear if it is intended to grant more autonomy for LALCs to pursue their own development and land-use objectives outside of the framework applying more generally. This could usefully be clarified.

Step 4. Develop place strategies to align development and infrastructure (p19)

The department will support and collaborate with councils to prepare place strategies for regionally significant places and other large growth areas that will address the aspirations of the community and councils' vision for each location.*

Place strategies will enable quality development alongside open space, transport and community infrastructure investments. They allow for early public engagement and early considerations around design, re- use of existing buildings, infrastructure and local assets.

Developed with community consultation, place strategies will consider biodiversity, flooding and other relevant planning matters usually considered through each rezoning proposal, enabling a more holistic analysis of the issues across the place strategy area.'

** Place strategies will be required for consolidation and expansion growth areas with 2,000 residential dwellings or more, other proposed urban or employment areas of more than 200 ha, or sites held by more than two landowners or across LGA boundaries. Sites under this benchmark are encouraged to prepare a place strategy.*

#Future new subdivision means any site yet to receive a gateway determination. It does not apply to existing zoned land, although a place strategy is recommended for sites where it could help to resolve infrastructure requirements prior to the development application for subdivision.

We note that while no regionally significant growth areas are listed in Pt Stephens, there are two Greater Newcastle Metro Plan 'Catalyst Areas' – Williamtown and Tomago within the LGA (see also Table 3, Appendix C, p 128). We assume that Place Strategies will be required for these two areas, although this may be replaced in the case of Williamtown by the Special Activation Precinct Master Plan to be released later in March 2022.

Employment growth at Williamtown and Tomago clearly has implications for housing supply and demand – see under 'Districts' below.

Place planning is clearly intended to become a very important part of the process. We are concerned that once a Place Strategy has been adopted, compatible developments could effectively be given the green light to go ahead without the all-important assessment and consultation processes that apply to Planning proposals and DAs. This is more than hinted at on p20 'Place strategies seek to result in upfront approvals'. This

could in effect be an extension of the 'complying development' regime which is already proving problematic.

Also on p20, it is proposed that proponents or landowners could apply for developments 'outside the sequence' (of the 6 steps)). This might be seen to provide for queue-jumping and even for approval of projects which completely depart from the directions set by the Regional Plan, the UDP and any relevant Place Strategy. This would undermine the integrity of the new approach and would be completely unacceptable.

Our other concern about 'Place Strategies is whether they will allow for 'bottom-up' grassroots input. For example, if a local community very strongly supports a specific height limit, and the Council reflects this in a Place Strategy and LEP, will the Department (and UDP Committee) accept that even if it is not entirely consistent with the UDP? Or does the new approach only work from the top down?

The objective of 'front-loading' the planning process to streamline and facilitate later approvals is desirable in principle, but runs into the intractable problem of how to get the community to engage with strategic planning when it is still at a relatively abstract level. Most people will only engage when faced with a specific and imminent change to their environment. While it may be impractical and unreasonable to allow them to veto major projects at a late stage, it is essential that there are meaningful opportunities for input at all stages.

Part 2 - Objectives & Strategies (pp 21-59)

We have selected only some of the content of Part 2 for comment, where it has a particular significance for Port Stephens, or where we consider it important more generally.

OBJECTIVE 1: Diversification and a circular economy (p22)

We strongly support the need for diversification of the Hunter economy and the development of a circular economy which will bring many environmental benefits and contribute to mitigation of climate change.

OBJECTIVE 3: *Create a 15 minute region made up of mixed, multi-modal, inclusive and vibrant local communities (p29)*

While we strongly support the objective of more self-contained communities that reduce the need to travel, we are concerned that some of the thinking behind this objective is overly focussed on metropolitan and urban areas, and the concepts may not be as easy to implement in smaller towns and rural areas.

We would also be concerned if too many new land uses were permitted in residential areas without an opportunity for public consultation (i.e. any significant extension of the 'complying development' provisions which are already proving problematic). Approval of too many shops and other services within new residential developments could also damage the viability of existing local centres, many of which are struggling with the closure of bank branches and from competition from large out of town retail parks.

A table on p33 shows a range of 'context settings'. We submit that it may be appropriate to add a further sub-category of 'Tourist town/village – examples would include Nelson Bay and Forster-Tuncurry, currently listed along with other 'service centres' in the 'Complete towns/villages' category. Localities with a high dependency on tourism have a range of special considerations including a high proportion of investment properties and holiday accommodation and variable seasonality.

OBJECTIVE 4: *Plan for "Nimble Neighbourhoods", diverse housing and sequenced development (p35)*

We agree with the Plan's view that 'A greater proportion of diverse and affordable housing will be needed.' We support Strategies 4.2 (small-scale renewal) and 4.3 (community driven innovative housing solutions).

The benchmarks for infill:greenfield development ratios proposed under Strategy 4.4 seem generally appropriate for the broad planning Districts but should not necessarily be applied rigidly at the local level. For example, it will almost certainly be impossible to find suitable greenfield land for 30% of new development in the Tomaree and Tilligerry peninsulas of Port Stephens due to environmental and other constraints. It does not however follow that any shortfall from the benchmark needs to be made up with a greater volume of infill development – the area may simply have a lower capacity for future growth.

We are concerned that the Plan identifies some major new growth areas (Strategy 4.5) while also stating that:

'The identification of potential future growth areas is not a development commitment, nor does it imply that all, or any, part of these areas will be made available for urban development in the future. To remove any doubt, the department will not support premature planning, investigation or promotion of

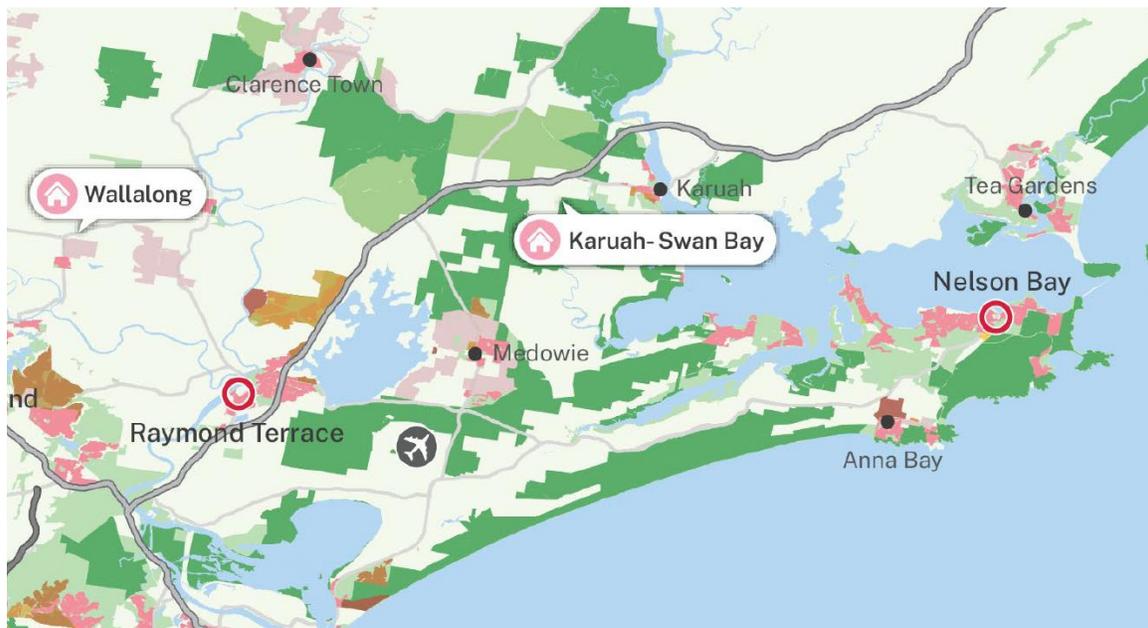
these areas; we will investigate their future role in the next review of the Hunter Regional Plan.’ (p39)

The two such areas shown within Port Stephens (see map below). In respect of the Karuah-Swan Bay area, we note that a new Karuah Place Plan has recently been through a round of public consultation, and makes some provision for significant new housing developments, but not including the land shown on the map.

Proposals for development at Wallalong are highly controversial and have been rejected previously due to infrastructure constraints and flood concerns.

The constraints on both areas are acknowledged in the Hinterland District section of the Plan on p100 (where Karuah-Swan Bay is labelled as Swan Bay-Twelve Mile Creek).

Given the increased flood risks due to climate change, it is very doubtful if these areas could ever be considered as suitable sites for major residential development. Identifying them on maps in the Plan as potential future growth area, even with the above caveat, sends the wrong message both to local people fighting to retain the rural character of the area, and to any speculative developers who have gambled on land acquisition.



Extract from Figure 2 Housing page 40

Figure 2: Housing



We also note that the proposal for a major residential development (up to 3500 dwellings and associated infrastructure) at Kings Hill north of Raymond Terrace is shown in Figure 2 as ‘zoned’ (for housing), with an adjacent area subject to Gateway approval. However, the concept plan for the already zoned area has recently been refused by the Joint Regional Planning Panel on 17 separate environmental grounds. Whilst that decision is currently subject to appeal, we submit that the Regional Plan should at least acknowledge that there is a question mark over the contribution this land will make to future housing supply.

We strongly support the need for affordable housing, particularly in eastern Port Stephens for the tourist economy workforce. (Strategy 4.6) There are major tensions between short-term rental holiday accommodation and stock available for permanent residence. It becomes very difficult to plan for future dwelling construction in tourist areas when the planning system currently has little influence over whether a new dwelling is bought by an investor for holiday use or long term rental, or by an owner-occupier.

We strongly support the need to ensure that the increasingly popular Lifestyle villages and communities are located in suitable locations, within easy reach of services by foot, cycle and public transport (Strategy 4.7). Regrettably, several major ‘lifestyle communities’ have been approved in Port Stephens in the last 15 years in unsuitable locations on rural land, abusing loopholes in planning law relating to ‘caravan parks’.

We strongly support Strategy 4.9 to limit dwellings on rural lands that are not a primary residence or associated with agriculture. Too many approvals have been granted in Port Stephens for inappropriate land uses on rural land, including ‘lifestyle communities’ and major tourist developments that have exploited provision for ‘uses permitted with consent’ under the LEP, but resulted in wholesale changes that fail to meet the zone objective to retain the rural character of the land.

OBJECTIVE 5: Increase green infrastructure and quality public spaces and improve the natural environment

We strongly support this objective and the proposed Strategies 5.1-5.12, and particularly the emphasis on maintaining and extending green space and tree cover, which has multiple benefits including shade, cooling, habitat and climate change mitigation.

We have one reservation about Strategy 5.8, which is that ‘offsetting’ for loss of native vegetation or urban tree removal is a largely discredited policy, and needs to be critically reviewed before it is relied on.

In relation to coastal management (Strategy 5.12), we strongly support the need to expedite planning for coastal management, and in particular the need for Councils to take more seriously their approach to developments on low lying coastal land subject to risk of inundation from storm surges and sea level rise.

OBJECTIVE 6: Reach net zero and increase resilience and sustainable infrastructure (p50)

We strongly support this objective and Strategies 6.1-6.6. Councils have been slow to take climate action seriously enough. In order to reduce emissions and to increase resilience to the many manifestations of climate change, significant changes will be needed to ‘business as usual’ complacency. If the government is genuinely committed to ‘Build back better’ as we emerge from the COVID 19 pandemic, several of the traditional ‘growth and development’ assumptions that are still evident in the Draft Plan need to be questioned.

We welcome the Plan’s promotion of walking, cycling and public transport and reduction of car dependency (Strategy 6.6) but major modal shifts will require significant behavioural and attitudinal change, and it is important that communities are educated and supported to adapt. This is a much wider task and challenge than can be achieved by land-use planning alone. Attempts to force change by, for example, limiting parking provision could face significant resistance particularly in communities where decades of bad planning have increased car dependency.

OBJECTIVE 7: Plan for businesses and services at the heart of healthy, prosperous and innovative communities (p55)

We support this objective and cautiously welcome the supporting Strategies. However, how the Strategies are implemented in practice, through Place Strategies and changes to LEP standards such as zoning, density and height limits, will be critical to whether they achieve outcomes that are acceptable to local communities.

In relation to Strategy 7.1, we support the general concept of mixed use town centres, and in particular the encouragement of more permanent residents in and close to centres provided that local character and the natural environment are respected. This is especially important in coastal tourist areas. The generally low rise character of the towns and villages in eastern Port Stephens is not only highly valued by local residents, but also a key selling point for the tourist economy. We submit that Forster is a case study of how NOT to provide for growth while respecting local character, and attempts to replicate the Forster-Tuncurry high rise apartment development on the Tomaree and Tillgerry peninsulas are being strongly resisted by the local communities.

We also endorse the importance of protecting existing centres from unfair and unnecessary competition from 'out of town' retail parks, which have been allowed to develop in multiple stages, too often on greenfield sites requiring major habitat destruction. Such retail parks 'lock-in' car dependency and have had a devastating effect on the viability of traditional town and village centres.

Comments on Part 3 from next page ...

Part 3 – Districts (pp 60-119)

The Map on p66 shows the Port Stephens area – which is split between Coastal, Greater Newcastle and Hinterland ‘Districts’ – see other maps on later pages.

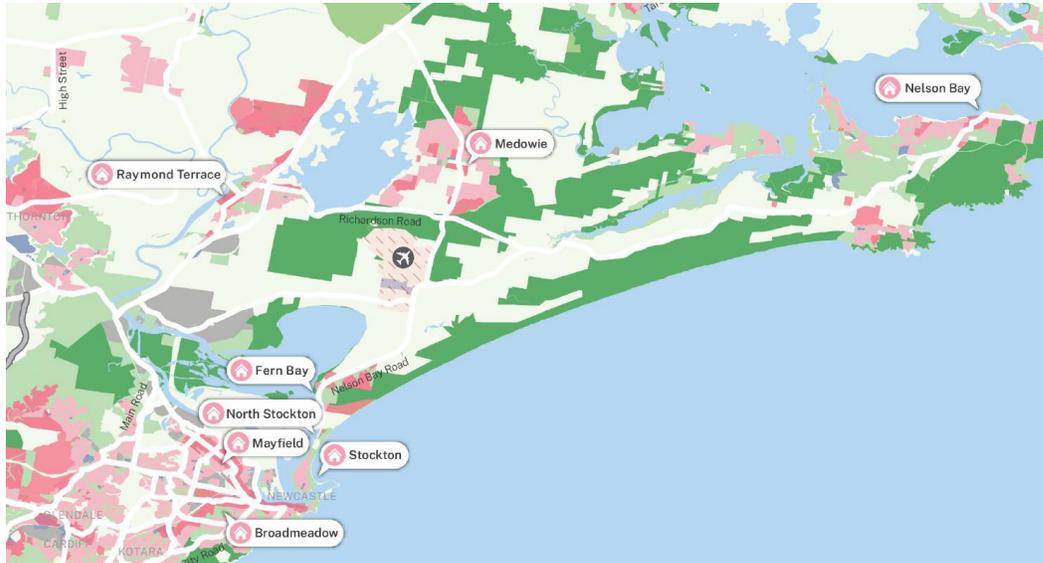


Figure 8: Williamtown regionally significant growth area

	Hunter UDP		Priority locations for future housing
	Business land		Airport
	Industrial land		National park and reserve
	Residential land		State forest
	Catalyst area boundary		Open space
	Highway		Water body

Fig 8 Williamtown regionally significant growth area

We generally agree with the division of Port Stephens between these three ‘Districts’ as different parts of the LGA have very different characteristics and economies. The ‘boundaries’ are somewhat arbitrary but seem appropriate, provided there is some flexibility in planning around those boundaries.

Figure 8 identifies Nelson Bay, Medowie, Fern Bay and Raymond Terrace (+ Newcastle locations) as Priority locations for future housing.

What this means for future land-use (and infrastructure) planning in these locations depends on which of the three 'Districts' they fall into – our relevant comments follow for each of these Districts, on separate pages.

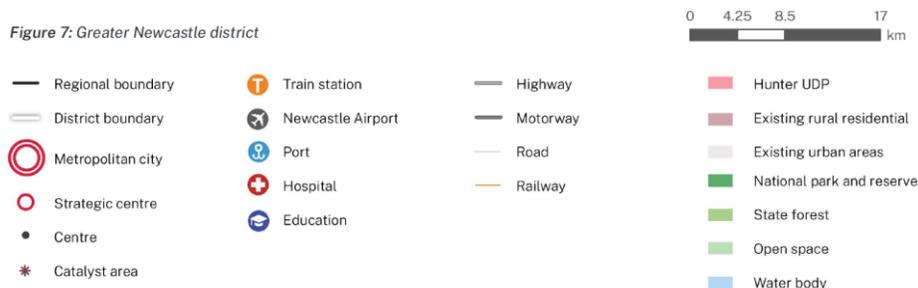
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Greater Newcastle District (p63)

Fern Bay, Raymond Terrace and Medowbie all fall into the Greater Newcastle District, and are already covered by the Greater Newcastle Metro Plan.



Figure 7: Greater Newcastle district



We have already commented earlier in this submission on the Kings Hill proposal north of Raymond Terrace (see under the 'Housing' objective above).

Fern Bay and Medowbie are both experiencing rapid growth, and both are subject to recent or current Place-planning by Port Stephens Council (in the case of Fern Bay jointly with Newcastle City Council as the growth area includes north Stockton).

Development in the Williamstown area will be largely determined by the State government's Special Activation Precinct (SAP) process, with a draft Master Plan due to go on public exhibition in March 2022. While we have major concerns about a 'democratic deficit' in this process, with our elected Council being sidelined, we will reserve judgement until we see the draft Masterplan and consultation process.

Hinterland District (bordering Greater Newcastle) (p97)

The map on page 98 shows Karuah-Swan Bay and Wallalong as Potential future growth areas.



We have already commented above (under Objective 4) on the unsuitability of these two areas for listing as ‘potential growth areas’ and this is supported by the comments on p100 about the infrastructure and environmental constraints.

In relation to the other rural areas and villages in the Hinterland District, including Hinton, Seaham and Clarence Town in Port Stephens LGA, the draft Plan says that they:

‘... will face increased pressures for residential development due to their scenic rural settings and proximity to Greater Newcastle. Incremental residential growth will be supported where constraints including infrastructure capacity, flooding, bushfire, flood access, infrastructure, important agricultural land and environmental can be managed.’

We submit that the emphasis in this statement is misplaced – it should more appropriately acknowledge the multiple constraints and suggest only that some limited incremental growth might be possible and appropriate within those constraints.

This suggested change of emphasis would assist the local communities, and Port Stephens Council, to resist the intense pressure for re-zoning and subdivision in these rural areas.

Coastal District (p115)

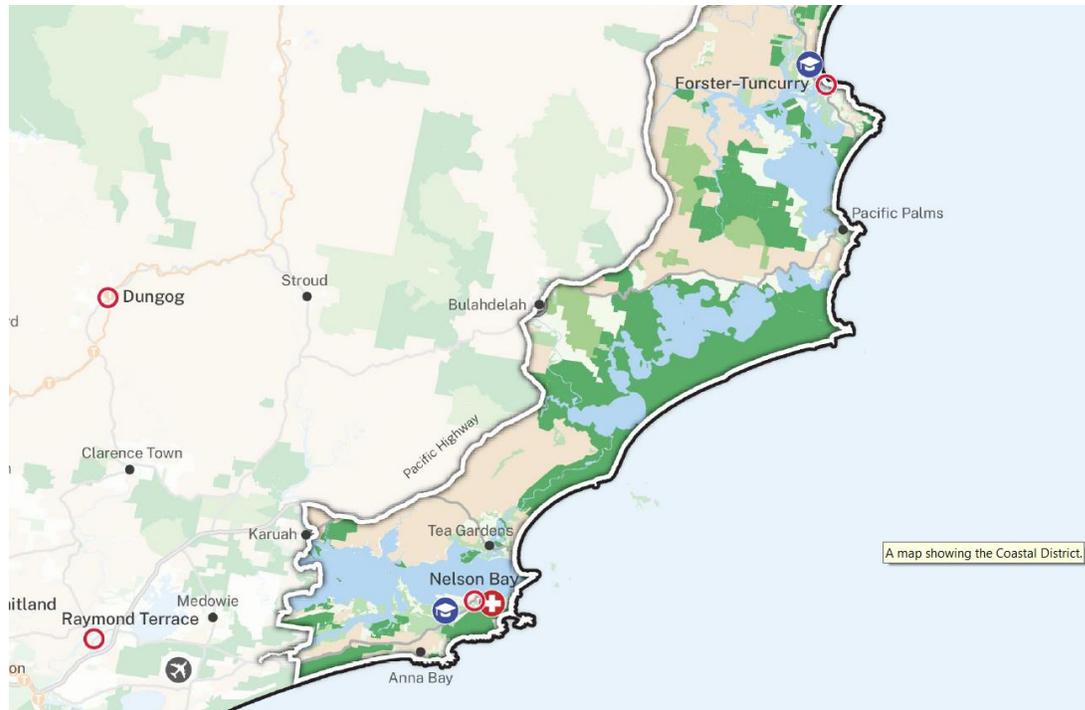


Figure 28: Coastal district



Note: The Coastal 'district' extends to the north of Harrington, and takes in Forster-Tuncurry

We have already commented earlier in this submission on specific issues relating to the eastern part of Port Stephens that lies within the 'Coastal' District; i.e. the Tilligerry and Tomaree peninsulas.

Nelson Bay is identified on this Map (Figure 28) only as a 'Strategic Centre', but on the Map on p66 (Figure 8, reproduced earlier) as also a 'Priority area for future housing'.

There has been much confusion over the last 20 years at least as to what the different planning authorities mean by 'Nelson Bay'. The Department of Planning appears to have mostly used it as a synonym for all of the smaller centres on the Tomaree peninsula taken together (including all urban areas from Anna Bay east), although at least one document showed the Salamander Centre as a second 'Strategic Centre' and the major expansion of the retail and industrial park at Taylor's Beach does not fit neatly into either hierarchy.

Port Stephens Council has variously used 'Nelson Bay' to describe just the town centre and foreshore area (as in the Nelson Bay Town Centre and Foreshore Strategy); a wider area including the immediately surrounding suburbs (Nelson Bay West, Corlette, Seabreeze Estate and Little Beach), or in some cases, an even wider area encompassing Salamander Bay and even Shoal Bay.

It is vitally important, for planning purposes, that all relevant authorities (and the community) are on the same page as to the meaning of 'Nelson Bay', and have a shared understanding of any targets for population and employment growth for the different localities on the Tomaree peninsula.

We submit that the Regional Plan should define what it means by Nelson Bay, and where appropriate distinguishes between the different Tomaree localities.

We have no objection to this submission being published in full and unredacted.

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