



BRAIDWOOD COMMUNITY ASSOCIATION

BCA Submission on the revised draft Braidwood Structure Plan (November 2025)

The Braidwood Community Association (BCA) welcomes the opportunity to comment on the revised draft Braidwood Structure Plan (draft Plan) dated November 2025. The BCA appreciates the efforts Council staff have made in trying to put the new draft into context and the changes made since the previous draft through the production of a series of [FAQs](#).

The BCA has been engaged in the consultation process since the outset and made a substantive submission on the previous draft (found [here](#)).

Summary

The BCA is very pleased and grateful that Council staff listened and responded to the major points of concern we raised on the previous draft, most notably the infrastructure constraints. The BCA believes the revised draft Plan is a much more realistic and acceptable document.

Typically, the main driver for rezoning areas is population growth. The BCA notes the large downwards revisions in population growth projections, particularly by the NSW government, between the first and current draft Plan. The BCA is concerned that this undermines the durability and creditability of the whole process and raises questions as to what will happen when the Plan is next reviewed in around 5 years' time.

Given this, the BCA believes it would be prudent for Council staff in the future to undertake their own analysis of population growth between censuses, based on known local data, like lot and housing approvals, and with input from the local community.

The high population projections used are from IWCMS Issues Paper and are based on projections similar to those used in the previous draft Plan. The BCA believes it is inappropriate to include these in this draft Plan. Their removal would reduce the median growth rate from 1.25% pa to 1.1% pa.

The BCA supports a cap being put on new development to limit the growth of Braidwood to less than an additional 300 dwellings to manage water availability for the foreseeable future, particularly given the costly infrastructure projects already on QPRC's agenda.

The BCA supports short-term priority being given to completing the existing development areas, infill and development of Areas 3, 4 and 5 within the existing Braidwood town in the short-term. Then Area 1 in the medium term, and Area 2 in the longer-term. This will provide more than sufficient development opportunities given the cap of less than an additional 300 dwellings.

The BCA notes that this projected development will depend on a number of factors including property owners' intentions, and interest shown by housing developers. The BCA supports Council's plans for a diverse housing product on the existing Council Depot (Area 3), and the stated intention to relocate the depot as soon as possible and rezone the site for housing.

The BCA's position regarding developments within the heritage areas is contingent on any revisions to the Braidwood Development Control Plan 2006 to contemporise heritage development while fully maintaining Braidwood's heritage values and the reasons for the State Heritage Listing and not compromising them for the sake of development.

The BCA is disappointed that TfNSW continues to resist public discussion on a possible bypass route in a long-term Plan like this. It fully supports Council's efforts to continue to advocate

for future bypass routes around Braidwood and to monitor traffic counts through Braidwood to determine the need for a bypass. While the BCA does not have a position on the merits of a bypass it believes that potentially affected landowners deserve to be provided with good notice of route options.

In different parts of the document there are different time periods for what are the same generic periods which leads to confusion and perhaps only one set of time periods should be used. Given the long lead times in the development process, the BCA suggests this should be the ones used in the Implementation and Monitoring Action Plan (IMAP).

Attachment 1 suggests a range of drafting improvements / corrections which, if included, will improve the final Plan.

Detailed Comments on the Plan

Who are we planning for?

As stated previously, future population growth is typically the main driver which determines when land needs to be rezoned.

The November 2025 draft Structure Plan has significantly different population growth scenarios to the December 2024 draft Structure Plan. See below:

Population Growth Scenarios in the draft Braidwood Structure Plans dated December 2024 and November 2025						
Growth	Source		Annual Growth Rate (%)		Period	
Scenarios	Dec-24	Nov-25	Dec-24	Nov-25	Dec-24	Nov-25
Low	Profile ID	Profile ID	0.99	0.7	2024-41	2021-51
Low-Medium	IWCMS 2019	NSW Population Projections	1.43	1.1	2021-51	2021-51
Medium-High	Discussion Paper	Australian Bureau of Statistics	3.66	1.4	2021-51	2021-51
High	NSW Population Projections	IWCMS 2025	4.125	2.5	2024-41	2021-51

The reduction in the Profile ID population projections from 0.99% pa to 0.7% pa between the two estimates appears minor but reduces the population by 190 persons by 2051.

The reduction in the NSW Population Projections from 4.125% pa last year (2024-41) to 1.1% pa this year (supposedly 2021-51) is very significant and equates to 3375 less persons by 2051. The population projection data on the [NSW website](#) is for the Braidwood district at a Statistical Area Level 2 (roughly equivalent to 2622) and is 1.1% pa for 2021-2041 (not 2051).

The BCA is concerned about the scale of these revisions and the robustness of the forecasts by the NSW Government. It therefore asked a question on notice for Council Staff to try find out, and share, the reasons behind the significant change in the NSW Population Projections. On 17 December an answer was provided as follows:

NSW Population Projections details are published in FAQs on the draft Braidwood Structure Plan's project page on Council's Your Voice website: <https://yourvoice.qprc.nsw.gov.au/draft-braidwood-structure-plan-nov-2025>.

This indicates that growth rates and population forecasts are fluid and the result of many contributing factors, such as migration trends post-COVID, cessation of mining operations, and/or an ageing population. They have decreased for Braidwood since work started on preparation of the Plan and needed to be updated to reflect current data. This includes updated population projections provided by NSW State Government, Profile ID and the Palerang Communities Integrated Water Cycle Management (IWCMS) Issues Paper 2025.

In addition to the response in the FAQs, the NSW Government population projections used in the earlier draft were the 2022 population projections. The current version of the Plan uses the 2024 population projections. The following link to the NSW Government projections

reiterates Council's FAQ response. See: <https://www.planning.nsw.gov.au/data-and-insights/population-projections/projections-explained>.

The BCA notes that the NSW government's explanation for the changes between 2022 and 2024 forecasts is more about justifying why the NSW forecasts are now higher overall and also in Regional NSW, and not why they are substantially lower as in the case of Braidwood.

The BCA believes that the focus of all these population projections is more at an aggregate State or regional level and that little, if any, thought is given to the specific circumstances of a small town like Braidwood.

The BCA is concerned that this crucial planning document is being driven by such radical changes in population projections. We believe this undermines the durability and credibility of the whole process and raises questions as to what will happen when the Plan is next reviewed in around 5 years' time.

Given this, it would be prudent for Council staff in the future to undertake their own analysis between censuses, based on known local data, like lot and housing approvals, and with input from the local community.

The BCA also notes that the high population growth scenario in the latest draft Plan is based on the IWCMS Issues Paper dated March 2025. This was in turn was based on similar population growth scenarios as the previous draft Plan. The BCA therefore argues that this is not an appropriate value to use for this exercise. The impact of excluding IWCMS 2025 from the population projections would be to reduce the median growth rate from 1.25% pa to 1.1% pa.

The BCA supports a cap being put on new development to limit the growth of Braidwood to less than an additional 300¹ dwellings to manage water availability for the foreseeable future, particularly given the costly infrastructure projects (eg Queanbeyan Sewage Works and the Bungendore water pipeline) already on QPRC's agenda. It notes that the Integrated Water Cycle Management (IWCMS) plan process may refine this number.

Structure Plan Development Areas

The BCA notes that the areas identified for development are radically different to the previous draft. Areas like Glenmore Rd and Boppings Crossing Rd (previous Area 3), Existing C4 Areas (previous Area 7), Sandholes Rd, Saleyards Lane and Gillamatong Lane (previous Area 8), Future Industrial Bombay and Sandholes Roads (previous Area 9) have been removed from the draft Plan. The BCA does not object to these changes.

The BCA supports short-term priority being given to completing the existing development areas (eg Braidwood Ridge), infill and new development in Area 3 (Council Depot), Area 4 (43 Lascelles Street) and Area 5 (51 Elrington Street) within the existing Braidwood town. Then in Area 1 (Station Street) in the medium term, and Area 2 (South of Glenmore Road) in the longer-term. This will provide scope for more than sufficient development opportunities given the cap of less than an additional 300 dwellings. The BCA asked whether the new development areas, like Station Street, could also have mixed housing developments and include R1 as well as R2?

The BCA notes that Action 5.1 is to '*Undertake a comprehensive review of the Braidwood Development Control Plan 2006 to contemporise heritage development controls, giving regard*

¹ The analysis used is not precise enough to have the current exact statement '*Limit the growth of Braidwood to an additional 309 dwellings to manage water availability*' and suggests it be changed to '*Limit the growth of Braidwood to less than an additional 300 dwellings to manage water availability*' in policies 1.1 and 3.1.

to the recommendations of the Heritage NSW's 15-year Management Review of 'Braidwood and its Setting' Milestone 3 Report - May 2024'

The BCA's position regarding developments within the heritage areas is contingent on any revisions to the Braidwood DCP fully maintaining Braidwood's heritage values and the reasons for the State Heritage Listing and not compromising them for the sake of development.

Bypass

The BCA notes the draft Plan makes reference to several studies and presentations which are not in the public domain, notably:

- Braidwood and Bungendore Network Study – Traffic and Transport Study Report (p20)
- TfNSW presentation – “Corridor feasibility investigation overview” – June 2025 (p22)
- Braidwood and Bungendore Network Study | Traffic and Transport Study Report, GHD, 14 August 2023 (p23).
- ‘... recent Braidwood and Bungendore Network Study commissioned by TfNSW (p22).

The BCA supported the GIPA request made by the Braidwood and Villages Business Chamber to have the Network Study report released. We have seen the report and note that the word ‘bypass’ is not mentioned once in the Network Study, which is largely a descriptive and technical monitoring of traffic flows and queue lengths over just 4 days in 2023 at various junctions within Braidwood on the Kings Highway, including on Easter Friday and Easter Monday.

It found for Braidwood that the peak hourly traffic volume on Easter Monday (7,166 vehicles), was more than double the number of peak hour trips (3,508 vehicles) on a typical weekday. It also found that there was a long southbound rolling queue (approximately 250m) during Easter Friday peak period at the Kings Highway / Duncan Street intersection, and a long westbound right-turn rolling queue (approximately 300m) during the Easter Monday peak period at the Kings Highway / Lascelles Street intersection.

Anecdotal recollections of holiday traffic on other public holidays are that it is not uncommon to have queues of traffic tailing back significantly further than these distances. For example, in the morning of the recent Saturday of the Australia day weekend (24 January 2026) traffic was backed up along the whole of Wallace Street (950m) and around the bend into Solus Street at least, so further traffic monitoring at other busy periods would certainly be desirable.

Further, the cameras monitoring the traffic were only in the centre of Braidwood, leaving no monitoring of congestion coming into Braidwood. Over some key holiday weekends there have been reports of queues tailing back to at least Cargills Lane, which is some 6 km out of Braidwood.

The Network Study did not look at traffic flows on the side streets favoured by ‘rat runners’, who are of considerable concern to locals, as a proportion of them appear to be speeding and disregard stop signs.

The BCA is disappointed that TfNSW continues to resist public discussion on a possible bypass route in a long-term Plan like this, because the traffic study *‘does not substantiate the need for a bypass now or in the near future’*. While the BCA does not have a position on the merits of a bypass it believes that potentially affected landowners deserve to be provided with good notice of route options.

The BCA fully supports Council's efforts to continue to advocate for future bypass routes around Braidwood (policy 2.1 on p35) and to monitor traffic counts through Braidwood to determine the need for a bypass (action 2.1).

Timelines

In different parts of the document there are different time periods for what are the same generic periods, namely:

	Braidwood's Future (p25+)	IMAP (p35-36)
Short-term	0-3 years	0-5 years
Medium-term	10-15 years	5-15 years
Long-term	10-20 years	15 years +

This leads to confusion and perhaps only one set of time periods should be used. Given the long lead times in the development process, the BCA believes this should be the ones used in the Implementation and Monitoring Action Plan (IMAP).

Thank you for your consideration.

Sue Murray,
President, Braidwood Community Association

Drafting suggestions on the revised draft Braidwood Structure Plan (November 2025)

- p3. Should refer to the Yuin nation and/or the Walbunja people.
- p8. Delete '*Yuin speaking*' in the first sentence.
Amend end of para 3 to add '*Mongarlowe*'.
Amend 2nd sentence in para 4 to add '*Batemans Bay*'.
- p14. Amend second sentence to read '*These strategies and plans ...*'
- p15. The Action Plan under 10 is actually dated January 2025.
- p20. Transport and Parking para 4 there are two private coach services between Canberra and Batemans Bay – Rixons and Murrays.

Amend para 5 from '*reduce pedestrian related crash rates*' to '*reduce pedestrian related crash risks*', given that thankfully there has been very few pedestrian related crashes in Braidwood.
- p23. Under Health Related Facilities add new bullet point '*Two privately run doctors' surgeries with supporting pathology and other services.*'
- p24. Amend para 4 from '*Observation of buffer distance requirement needs to be maintained*' ... to '*The buffer distance requirement needs to be adhered to ...*'
- p25. Amend para 3 from '*medium term 10-15 year timeframe, and the long term 15-20 year planning horizon*' to '*short-term (1-5 years), medium term (5-15 years), and the long term (15 years +) planning horizon*'.
- p27. Amend '*Exiting maximum lot size (MLS)*' to '*Exiting minimum lot size (MLS)*'
It would assist understanding if Figure 5 image was rotated so it aligned with Map 12 on p 26.
Change Timing to *5-15 years*.
- p28. It would assist understanding if Figure 6 image was rotated so it aligned with Map 12 on p 26.
Change Timing to *15 years +*.
- p29. Change Timing to *0-5 years*.
- p30. It would assist understanding if Figure 8 image was rotated so it aligned with Map 12 on p 26.
Change Timing to *0-5 years*.
- p31. It would assist understanding if Figure 9 image was rotated so it aligned with Map 12 on p 26.
Change Timing to *0-5 years*.
- p32. Map 13 Staging has Area 1 as long-term and Area 2 as medium-term, it should be the other way round.

It would assist understanding if Map 13 was rotated so it aligned with Map 12 on p 26.
- p35. The word "additional" needs to be added before "dwellings in Braidwood".

- p35. The analysis used is not precise enough to have an exact statement like '*Limit the growth of Braidwood to an additional 309 dwellings to manage water availability*'. Suggest it be changed to '*Limit the growth of Braidwood to less than an additional 300 dwellings to manage water availability*' in policies 1.1 and 3.1.