



BRAIDWOOD COMMUNITY ASSOCIATION

COMMENTS ON THE QPRC WATER AND SEWERAGE STRATEGIC PLAN – PALERANG COMMUNITIES

The Braidwood Community Association (BCA) welcomes the opportunity to comment on the Queanbeyan-Palerang Regional Council (QPRC) Water and Sewerage Strategic Plan – Palerang Communities (the Plan).

The Plan has been compiled for QPRC by NSW Public Works, with some input by QPRC staff, and so is effectively a consultant's report.

SUMMARY

- The report was largely compiled some time ago (during 2024 and 2025) with some partial updates this year. As such it contains a lot of incorrect historical information and events have already overtaken much of the report's analysis.
- This consultation appears to be more of a box ticking exercise where the report is destined to gather dust on a shelf. This is underlined by the fact that the all-important Appendices to the report giving the details of the calculations are not on public exhibition. Without seeing the details there can be no real scrutiny of its findings.
- The models developed by the NSW Public Works may still be useful tools, but the output of the models are only as good as the data put in. Given the text is so out-of-date, there can be no confidence that the infrastructure costs used in the analysis are current. This is particularly the case for the Queanbeyan to Bungendore (Q2B) water pipeline project and the Queanbeyan Sewage Treatment Plant Upgrade where the costs escalate every time there is an update given.
- Without any details on how the developer charges have been calculated and given the errors in the overall calculation made last time they were revised in 2021-22, the BCA is concerned that these are not sufficient. It would also like to receive an explanation of why the Queanbeyan developer charges are significantly less than those for Bungendore and Braidwood.
- Nevertheless, the results for the financial modelling and the increases in the Typical Residential Bills (TRB), particularly for sewerage charges and in the sensitivity analysis, should be of great concern to Councillors and residents alike.
- The title of the Plan is now misleading, since following the amalgamation of the former Queanbeyan and Palerang water funds into a single QPRC water fund from the commencement of the 2026-27 financial year, relevant analysis of TRB is now on a QPRC level.

RECOMMENDATION

The BCA believes this Plan in its current form is not fit for purpose and should not be adopted by Council but be sent back to NSW Public Works for a full update, including ensuring the latest data is used in the financial modelling. Then when the report comes back for further public consultation the report and all the Appendices are put on the Your Voice website.

DETAIL

The report is out of date.

The Plan contains outdated and hence incorrect information about projections for Braidwood's development growth.

The Plan (p9) states that:

"The Braidwood Structure Plan was formally adopted by Council in March 2026. The structure plans provide forecasts for population and dwelling growth in these communities."

Yet in Section 5.2.5 on Braidwood Residential Growth, all the information is taken from the Discussion Paper for the Braidwood Structure Plan dated January 2023. There have been two versions of the Braidwood Structure Plan since that Discussion Paper, and the final Structure Plan endorsed by Council on March 2026 is very different from the 2023 Discussion Paper.

The information and projections for infill lots and long-term growth areas in the Discussion Paper 2023 were not used in the final Braidwood Structure Plan. The infill lots identified in 2023 were not an accurate reflection of the areas available for infill development at the time, while the long-term growth areas were extensively revised once the limits on the capacity of Braidwood's water storage were identified and acknowledged when developing the Braidwood Structure Plan.

Maps 5.2 and 5.3 are incorrect and do not align with the Braidwood Structure Plan 2026.

The BCA pointed this out in its [comments](#) on the Palerang Communities Integrated Water Cycle Management (IWCN) Issues Paper 2025. Apparently, our comments were either not read or they were ignored. The list of references in the Strategic Plan provided by NSW Dept of Public Works does not mention the March 2026 Braidwood Structure Plan.

The population projections in the Water and Sewerage Strategic Plan on Your Voice do match the projections in the Structure Plan endorsed by Council in March 2026. ie the maximum population identified as able to be serviced by the current water supply system is 2400.

However, in Section 12.2 Braidwood service area the Plan states *"The water requirements for the Braidwood water supply scheme will exceed the sustainable yield of the headworks in around 20 years. This equates to a population of around 2,400."* (p48). This is in line with the cap adopted in the 2026 Structure Plan of 309 dwellings ($309 \times 2.2 \text{ persons} + 1710 = 2,390$ persons). As this draft Strategic Plan is a 30 Year Plan, this projected 20 year limit on the Braidwood water supply needs to be acknowledged and planned for in advance.

As an example of how out-of-date the information in the strategic plan is, we note this comment:

"The development of the Summerfield Braidwood retirement village (70 Little River Rd) had just started when the data for this project was provided." (p14).

Summerfield Retirement Village is almost complete and has been occupied progressively over the last 10 years.

Another example is the inclusion of 64A Wilson Street as open for infill development. This site has been developed since 2016.

These are just some examples of outdated information for Braidwood. There are others, and we have not looked at the statements for other parts of the LGA.

Developer Charges are a black box

The Plan gives ‘*First-cut developer charges*’ on p61 and p70. There is no information as to how these estimates were made and there does not appear to be an Appendix dealing with developer charges.

While the BCA acknowledges that this is just a first cut, it is concerned that there could again be errors in the assumptions used for calculating the developer charges, as it still maintains this was the case last time they were calculated in 2021-22.

These errors are principally related to an under estimation of the number of new equivalent tenements (ETs) that contribute to the funds. This is important because effectively there is a total financial envelope for the funds and if developers’ total contribution is less than it should be, the shortfall is made up by existing residents through higher charges. A detailed explanation of this can be found [here](#).

The summary results presented in the Plan are also of concern, with the developer charges for Queanbeyan being significantly less than those for Bungendore and Braidwood (see Attachment 1).

The BCA does not know the reason for this and requests an explanation from Council staff.

Typical Residential Bills (TRB)

The analysis of TRBs is based on historical data dating back to 2022-23 and 2023-24, when there should be data for at least 2024-25 available when the report was signed off on 10 June 2026.

Also, given the text is so out-of-date there can be no confidence that the infrastructure costs used in the analysis are current. This is particularly the case for the Queanbeyan to Bungendore (Q2B) water pipeline project and the Queanbeyan Sewage Treatment Plant Upgrade where the costs escalate every time an update is given.

Water TRB

The result of the financial modelling is done in 2024-25 dollars. This means that the actual future charges will be higher by inflation in actual prices.

Regarding the result for water charges for Palerang alone, the Plan states it:

“... demonstrates that the 2026-27 typical residential water bill of \$1,250 p.a. (\$1,287 p.a. in 2025-26 dollars) needs to increase by \$950 to achieve a TRB of \$2,200 p.a. in 2026-27. TRB can then be maintained at that level for all the remaining forecast period.” (p63)

This is of great concern to residents, although not a surprise given the cost of the Queanbeyan to Bungendore (Q2B) water pipeline project is currently at +/- \$110m (even if it is assumed that there is a 50% grant and developers are meant to pay for the remainder of the pipeline).

But when the modelling is done for QPRC, the Plan states the results:

“... demonstrates that the 2026-27 typical residential water bill of \$1,185 p.a. (\$1,269 p.a. in 2026-27 dollars) can be maintained and no TRB increase will be required for all the remaining forecast period.” (p70)

While this result is very encouraging, it is difficult to reconcile the two results. The spreading of the cost of the Q2B pipeline and other costs over the whole of QPRC would be expected to reduce the increase required. But to have no increase in the TRB is more than a surprise.

The sensitivity analysis considers the scenario of no grant. This suggests TRB would be \$90 per household higher. This underlines the importance of Council being successful in getting a grant for the Q2B pipeline.

Sewerage TRB

The financial modelling for QPRC states:

“... demonstrates that the 2026-27 annual residential sewerage charge of \$967 p.a. (\$1,035 p.a. in 2026-27 dollars) needs to be increased at the rate of \$70 per year for the next 3 years p.a. to achieve \$1,177 p.a. in the year 2029-30. Thereafter, it can be maintained at that level for the following five years till 2034-35. From 2035-36 onwards, the TRB can be decreased to \$1,037 p.a. and maintained at that level for all the remaining forecast years.” (p76)

Again, this is of concern to residents. The sensitivity analysis of a 30% increase in the capital cost (principally the Queanbeyan Sewage Treatment Plant Upgrade) suggests the yearly TRB could rise by a further \$390 per household to \$1567 p.a.

Given the way the costs of the Queanbeyan Sewage Treatment Plant Upgrade appear to be escalating, and it is unknown what the capital cost has been allowed for in the modelling this may well be an underestimation.

CONCLUSION

The BCA believes this Plan in its current form is not fit for purpose and should not be adopted by Council but be sent back to NSW Public Works for a full update, including ensuring the latest data is used in the financial modelling.

Submitted by Sue Murray

BCA President

On behalf of the Braidwood Community Association

14 August 2026

Extracts from the QPRC Strategic Plan – Palerang Communities Water and Sewerage on developer charges.

Table S1: First-cut developer charges for the preferred scenario – Water supply

Service Area	Capital Charge (\$/ET)	Reduction Amount (\$/ET)	First-cut Developer Charge (\$/ET)	2024-25 Developer Charge (\$/ET)
Bungendore Greenfield	29,820	1,699	28,121	21,515
Bungendore				8,680
Braidwood	9,143	3,150	7,444	8,680
Queanbeyan	6,595		3,446	5,460

Table S2: First-cut developer charges for the preferred scenario – Sewerage

Service Area	Capital Charge (\$/ET)	Reduction Amount (\$/ET)	First-cut Developer Charge (\$/ET)	2024-25 Developer Charge (\$/ET)
Bungendore Greenfield	22,652	5,766	16,886	12,127
Bungendore				12,127
Braidwood	15,537	4,352	9,771	12,127
Queanbeyan	11,899		7,547	1,798

Taken from page vii of the Executive Summary of the QPRC Strategic Plan – Palerang Communities Water and Sewerage.