

SUBMISSION TO NSW DEPARTMENT OF PLANNING & ENVIRONMENT

DRAFT NORTH COAST REGIONAL PLAN

Introduction

This submission contains my personal observations of the Draft North Coast Regional Plan (the Plan), with particular emphasis upon the content and perceived intent of the Plan as they pertain to Nambucca Shire (Mid North Coast). My comments are addressed to both the Department and to Nambucca Shire Council for consideration. The Plan Foreword states that 'By focusing growth in cities and centres we can protect the sensitive coastal area with its productive farmland and significant environmental and cultural values'. The Introduction states that the Plan 'integrates economic, environmental and social considerations to achieve ecologically sustainable development – a high priority for the region'. Admirable sentiments but while necessarily seeking to avoid being overly prescriptive, the body of the Plan provides too much in the way of potentially conflicting statements to guarantee that the protections needed to achieve 'ecologically sustainable development' will indeed be afforded.

General

The Plan has a broad scope and its weakness lies in a tendency throughout to generalise. In many instances, localised conditions and concerns are quite specific to that particular area and the approach of 'one size fits all' across 13 Local Councils is inappropriate.

Comments

Foreword. Governance of the Plan is dependent upon a Committee process that allows minimal direct input from Local Councils on the Coordination and Monitoring Committee, thereby removing the most informed connection between the concerns and needs of ratepayers and State-level governance. This should be of concern to all Councils likely to be affected by the Plan. Ultimately, successful implementation of the Plan will be the responsibility of the elected Local Councils but they are deprived of their best opportunity to argue their case from a position of knowledge-based strength. It would appear that the only circumstance in which Local Council direct representation will occur is when a North Coast Regional Plan action is given priority status. The conditions leading to 'priority status' are undefined.

Pp7 and 10. Bowraville, with a population of 2,500, does not appear on the maps on these pages as a Town/ Village. This oversight should be rectified.

P8 **Figure 2.** Part of the text for the upper RHS node reads 'Ensure new development **avoids** high environmental values'. This wording is misleading; it should read either 'Ensure new development **embraces** high environmental values' or 'Ensure new development avoids high environmental value areas'.

P11 **GOAL 1 – A natural environment, and Aboriginal and historic heritage that is protected, and landscapes that are productive.** Such considerations are pertinent to the area of Valla rural that is marked, on P 33, as "Potential Mineral Resource" and possibly to other areas so designated.

P20 DIRECTION 1.2 Protect and enhance productive farmland. The aim is very necessary, but again I refer to the map on p33; the map does not show any farmland in that area, which is quite patently incorrect. Similar incorrect categorisation of farmland throughout the North Coast is likely to have occurred and should be rectified.

P24 DIRECTION 1.3 Safeguard aquatic habitats and water catchments. This consideration should preclude the approval of any form of open cut mining in water catchment areas on the Mid North Coast, noting that our rainfall patterns mean that the safe, contained operation of attendant tailings dams cannot be guaranteed as evidenced by the numerous breaches of conditions at Hillgrove Gold mine over its years of operation and the resultant legacy of long-term pollutants. To quote the Plan, p27, 'Flooding, in particular, is a major hazard on the North Coast due to topography and regional climate'.

P28 DIRECTION 1.5 Deliver economic growth through sustainable use of, and access to, mineral and energy resources. The key word here is 'sustainable'. Local Councils will need to be judicious in achieving a truly sustainable and reasoned balance between the desired outcomes of this Direction and that of Direction 1.3. As previously noted, the nature of rainfall patterns on the Mid North Coast and the flood-prone nature of much of the regional topography should preclude any consideration of large scale open cut mining on the Mid North Coast.

P31 ACTION 1.5.1 Facilitate investment in the resources and energy sector. Transition areas surround identified resource areas and were formerly referred to as buffer or separation zones. They are areas that may be affected by activities associated with resource extraction and are identified to minimise the potential for encroachment and land use conflict. Figure 7 indicates a Transition Area which is centred upon the vicinity of the current Valla Quarry. The past, present and ongoing tensions and formal action between Valla residents and the Quarry operators suggest either that such an approach is untenable or that the initial planning process for the Quarry was unsound and that no further consideration should be given to extending the Licence.

P33. What constitutes 'Regionally Significant Farmland'? There are many areas of active, productive farmland, on this map and undoubtedly on those of the surrounding areas, that are not marked as such. This is misleading to non-local planners who need accurate information to inform their decision-making processes.

P35 GOAL 2 – Focus growth opportunities to create a great place to live and work. The Plan promotes the development of Tweed Heads, Coffs Harbour and Port Macquarie to drive future prosperity for the North Coast. The Plan needs to ensure that the economic wellbeing of the Nambucca Valley is not adversely affected due to the 45 minute transit time to Coffs or the even greater transit time to Port Macquarie. If these three cities are to be the focus, we must ensure that the ability of Nambucca Valley residents to participate in the workforce of these cities is enhanced, as any increase in the number of wage earners in the Valley will enhance the local economy and improve the ability of Council to increase its operating budget through increased full rate revenues. The Plan states that the growth of surrounding regional centres and towns will be integrated with that of the regional cities by reinforcing transport and other links. This is but one aspect of the solution; a holistic approach will be required.

P41 The Plan states that ‘Regional cities, regional centres and towns support each other’s growth. Regional centres and towns are often within commuting distance of the regional cities and offer complementary housing and employment opportunities. For example, some employment activities, such as large lot industrial uses, may be best suited to certain regional centres and towns where there may be fewer constraints and cheaper land supply’. This represents an opportunity for Nambucca Council to advance the advantages of operating a business in the Valley. Figure 13: Coffs Harbour Regional City and Growth Precincts, however, suggests that the Plan does not think widely enough in terms of what should be considered as potential Growth Precincts. It is merely an expansion of the current Coffs Harbour urban limits. Adherence to this scope will serve to sequester Nambucca Valley from much of the potential economic growth of the Mid North Coast.

P47 ACTION 2.3.1 Focus future growth into the mapped urban growth areas. Urban growth areas are identified to accommodate growth; to protect important farmland, fragile and vulnerable ecosystems, and heritage assets; and to reduce potential land use conflict. FIGURE 34: Urban Growth Area Map for Nambucca Local Area shows the area to the west of Valla as an urban growth area. This is the same land that is also shown at Figure 7: North Coast Resources and Farmland as being ‘Potential Mineral resource’. It is not sustainable to exploit a potential mineral resource within an urban growth area. For the peace of mind of landowners and to better enable planning by Council, this anomaly needs to be rectified in the Plan, in particular by comprehensive application of **ACTION 2.3.2 Identify residential, commercial and industrial uses in urban growth areas by developing local growth management strategies.**

P50 ACTION 2.4.1 Support council-led precinct planning. This is a sound element of the Plan, which states that Precinct planning, while having broader application, should be considered for areas that may undergo change as a result of bypasses from the Pacific Highway upgrade. Areas such as Macksville, Nambucca Heads and Urunga will be significantly affected by completion of the Pacific Highway upgrade. This milestone presents many opportunities for positive change and Council should continue its current proactive approach by commissioning a comprehensive SWOT Analysis. By garnering significant community input Council will gain much advantage in change managing the undoubted flow-on effects of the upgrade.

P70 ACTION 4.4.2 Encourage well located employment land with suitable buffers to minimise land use conflicts. The Plan states that ‘Employment land needs to be protected from encroachment by incompatible development that is sensitive to the real or potential impacts of noise, smoke, dust, odour, vibration and light, and/or because it generates potential risks.’ The same is true of urban development areas, such as at Valla, where the current operations of the Quarry plainly fail to meet these sensible planning considerations.

P71 ACTION 4.5.1 Plan for future retail and commercial needs. The Plan states that the ‘NSW Government will... work with councils to focus retail activity in existing commercial centres, unless there is a demonstrated need for new centres, with positive social and economic benefits for the community’. This represents a clearcut case for focusing on rejuvenating current premises at Macksville in order to maximise the use of post-Pacific Highway upgrade opportunities.

P74 ACTION 5.1.1 Protect the travel time and safety improvements from the upgrade program. It is presumed that in planning the ‘strict traffic control, via grade-separated interchanges, (that) delivers superior conditions for capacity, congestion, speed and safety’ the anticipated increase in

population of the North Coast as reflected in **Figure 8: population of the North Coast 1991–2036** has been used to calculate local traffic flow figures, with particular reference to Pacific Highway access to/from areas listed in **Table 4: Additional Dwellings needed by 2036 for each Local Government Area**. Local Councils will need to ensure that proposed interchange design meets the requirements of the increased traffic flow inherent to the Proposed Urban Land and Proposed Employment Land, with particular reference in Nambucca Shire to Scotts head, Macksville and Valla as shown on **FIGURE 34: Urban Growth Area Map for Nambucca LGA** .

Recommendation

It is recommended that my comments on the Plan be considered by the Department when producing the final version of the Plan and by Nambucca Shire Council when consolidating their input to the draft Plan.

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