

**Manager Community Wellbeing & Manager Economic & Business Development
Comments and Recommendations on NSW Planning and Environment Draft North
Coast Regional Plan, released March, 2016**

Overview Comments.

1. The plan needs to be renamed North Coast Land Use Regional Plan to provide clarity on the key focus of the plan. (It is not an overall whole of NSW government plan.)
2. The current draft plan has no demand information on the wellbeing, ideas, needs, aspirations or priorities of the existing north coast population for the future of the land use of the region. This information would usually be a precursor to development of such a far reaching plan and could be gained through either sample survey or extensive community engagement prior to or as a minimum during the ongoing development of the plan.
3. The current draft plan presents no specific data and only limited information (attracted to the natural environment) on the reasons people move to the north coast region and whether those reasons and associated factors will remain constant for the next 20 years as appears to be assumed. Such data would be needed to support the bold assertion made that 90% of the projected population increase will be over 65 years of age.
4. In the absence of the information from point 2 and 3 above, the draft plan is a supply side only plan as it does not include demand information other than a broad statement on an overall growth number and its anticipated composition of 90% over 65 years of age. (this projection is disputed based on further comments below).
5. The demographics prediction in the introduction appears to assume that the current trend of retirees moving to the area will continue and accelerate.
On the ground experience and observation (evidence) from residents in the region indicates that key reasons young people leave the region are lack of jobs or lack of desired tertiary educational opportunity.
If education opportunities and more jobs are located regionally and/or the predicted impact of access to fast broadband and online business development continues to materialise, less young people will leave the north coast region which will change the predicted demographics.
6. The structure for the delivery of the plan does not include representation of any human service agency (education, family and community services, health, housing etc) who could and should inform the process from a people impact point of view, particularly as the draft plan specifies growth in employment in education and health and has a focus on housing provision.

The structure also only allows for 2 local government representatives even though each local government is autonomous and throughout the draft Plan continual reference is made to 'working with councils' to achieve the desired goals

7. The maps provided do not show sufficient towns to be able to make an informed comment on what can be contentious issues such as mining mineral resources. More details on the mapping are required
8. The maps should as a minimum include Urunga on all versions of the map particularly as it is an urban growth area.
9. Infrastructure needed for the region includes waste facilities and capacity, sewer facilities and capacity, and telecommunications facilities, capacity and reliable speed and social and recreational facilities (as well as the housing detailed elsewhere) in addition to the needs identified in the draft plan for transport, water and electricity for infrastructure for the regions growth (pg. 15),
10. Goal 1-A natural environment, and Aboriginal and historic heritage that is protected, and landscapes that are productive

Direction 1.1 Action 1.1.1 Identify and manage areas of high environmental value – the Figure 1 map of high environmental values shows an orange diagonal marking rather than a dark green diagonal marking in the world heritage area which from the symbols legends further in the document, mistakenly appears to indicate that the land is Biophysical strategic Agricultural land

-on page 19 the only threatened species that are referred to are those relating to fish and aquatic life. If there are terrestrial species under threat they should be included as well as aquatic species.

Direction 1.5 and Action 1.5.1 Facilitate investment in the resources and the energy sector -do not anticipate potential conflict over water use nor potential contamination and therefore do not provide any strategies for management of such potentials.

Additionally, run of river hydroelectric systems are not included in the list of potential renewable energy sources despite the high level of rivers and streams capable of supporting such systems on the north coast. Run of river hydro systems only borrow water to use its energy of flow, rather than devour it, and are therefore a useful part of the potential renewable energy sources.

11. Figure 7 on pages 32-3 does not include a specific referenced identification of the Clarence –Moreton basin which is noted on page 28 as a potential coal seam gas resource. A clear identification on the map is needed.
12. The draft plan specifies the NSW government it will work with Councils to achieve the goals but does not explain how other than proposing a coordination and monitoring committee which will only have 2 council representatives although there are currently 13 independent decision making Councils.

Goal 2- Focus growth opportunities to create a great place to live and work

1. The draft states growth will occur in the regional cities due to the *natural qualities* of the cities. The natural qualities exist throughout the region with beach areas in non city as well as city areas so this is not the relevant factor on which to base assertions of growth.
2. It is stated that housing choice and unexplained promotion of employment growth in health, education, aviation and other services will drive future prosperity. This statement provides no information on how this will be achieved and appears to ignore the potential for growth to come from online businesses or on line service provision.
3. No explanation is given on *how* the plan will achieve..."The growth of inland centres and towns will be encouraged."
4. What will NSW Government working with councils to deliver supporting infrastructure consist of-more plans ? financial assistance? Advice on innovations? How is supporting infrastructure defined? Does it include community social infrastructure facilities (e.g. schools, hospitals, child care, youth centres, aged care, community centres, neighbourhood centres) and *services (early childhood nurses, allied health, family day care, pre school education, social support services, family assistance services, youth services, aged care services, disability services etc?* Or is it limited to things like transport? If limited state the limitations or provide an explanatory definition of 'supporting infrastructure'.
5. Variations to urban growth areas specify that such variations will only be permitted if along with other factors, there is no cost to government. Does this mean no cost to the NSW government or all areas of government? Please clarify..
6. The figures given under direction 2.1 state the three specified regional cities have 43% of the regions population and in 2011 42% of the jobs were concentrated in the regions cities. These figures do not support the reference to a *concentration* of jobs in the regional cities. Based on the presented figures there is a slightly less than proportional representation of jobs in the regional cities.

Given by the reports figures, employment is dispersed somewhat proportional to population in the region, any action on jobs growth should be dispersed throughout the region consistent with the current distribution on where the population considers it is already a great place to live and work.

7. Reference is made to 'higher order' commercial services and 'higher order' cultural and civic services-what is meant by that?
8. Based on the figures presented in Table 2 Share of population, housing and jobs in regional cities, it appears that Coffs harbour is doing proportionally better than the other two cities with respect to share of jobs compared to share of population. If so, what analysis has been done to determine the factors that have created this situation so that plans can build on the success.
9. On page 39 it is stated findings of feasibility modelling on where multi unit development can occur will be used ...'to make regional cities more attractive for

higher density residential development'. Is this the kind of housing people who are moving to the region want now and is it the kind of development the projected future retirees moving to the region are looking for?

10. The focus on (housing) growth precincts as a job generator is only short term jobs. The growth of on line businesses means that people are no longer required to work in higher density cities for employment they just need access to fast, reliable internet access, and computer technology . The potential impact of technological advances and innovation on job location does not seem to have been considered as a factor.
11. What does the statement ...'The NSW government aims to strengthen the interactions between precincts ' mean?-fund better roads? Provide public transport links? Build walkway and cycleways? Provide shuttle services? Car parks?
12. The commentary on Figure 11 notes that regional centres and towns are complementary to regional cities. This assumes that the regional city is dominant and other areas are just feeder areas. In fact each centre and town is distinct and has its own character, options and features as do each of the cities. The centres and towns do not see themselves as complementary, they see themselves as a clear, individual distinctive choice.
13. What are higher order services and employment opportunities-please define.
14. Given comments in point 6. above and the figures presented in the report it is hard to see how investing in services and infrastructure in the cities... "will create a wider variety of jobs and high quality living environment for the whole region" as noted under action 2.1.1. Alternatively it may just mean there are more people travelling further on lesser quality roads to access services that have been concentrated in the cities.
15. The Plan Committee and the Regional Cities Steering committee both say they will include relevant state agencies, however there is no human service type agency mentioned. Given the concentration on education, health and housing, as a minimum these agencies should be represented and given the general lack of consideration of community services in the draft plan it clearly needs representation from Family and community Services as well.

Family and Community Services is currently running a place based planning initiative to coordinate services in areas. This approach could be expanded throughout the region.

The Primary health network has compiled a lot of data based on an extensive survey in the mid north coast, together with a range of health or disease state data which may be able to inform some planning of health services.

16. Page 48 states : "To provide maximum potential for urban development, active and passive open spaces may be located outside the urban growth areas." This suggests concentrated higher density housing with no green or open space as a relief . This

would be undesirable from a developing community and social interaction perspective and could potentially lead to social problems in the future.

17. Table 3 on page 49 is the first time the plan acknowledges that sewerage infrastructure and waste facilities are part of the infrastructure that must be considered. This consideration needs to be extended throughout the document.
18. Direction 2.4 -Great places to live are created not just by good design and provision of open space, they need community and cultural facilities and the energy of social interaction through the provision of people based services, sport, recreation and creative activities and volunteers and not for profit agencies willing to provide the services. The NSW Government has a role to play in funding the provision or expansion of such services to meet the demands of population growth.
19. Under action 2.4.2 it is stated the NSW Government will focus first on regional cities for walking and cycling opportunities. However regional cities already have walking and cycling networks so it would be more fruitful to focus on areas adjacent to regional cities to create linkages.

Goal 3 -Housing choice, with homes that meet the needs of changing communities

1. The proposal for NSW government to work with Bellingen Council re urban growth areas is welcomed.
2. Any Council with urban growth areas will need the benefit of access to the NSW Government's Housing Acceleration Fund to be able to fund new infrastructure to support housing supply. Therefore access to the fund should not be restricted to the places identified under action 3.1.2.
3. Direction 3.2 on delivering housing choice to suit changing needs states that 40 % of new housing supply in the next 20 years should be in multi unit dwellings. The demand for this provision is assumed in the plan to be from the ageing population and smaller households. No demand data is presented to substantiate this prediction. Without demand data, care needs to be taken not to assume that an ageing population want to live in a smaller or a multi unit type dwelling.
4. Notwithstanding the above comment, residents who reach the point of requiring an aged care facility need to know there will be adequate places available in suitable locations however the plan does not appear to specifically address this need.

Goal 4-A prosperous economy with services and infrastructure

1. Reference to infrastructure in the overview of plans to meet this goal only refers to education, health, transport, water and electricity as infrastructure. However infrastructure for waste management, sewer, telecommunications and community and cultural facilities are also needed.
2. The plan notes the government will plan for the transport services associated with the *growth* of health and education precincts however an important consideration for the population outside the regional cities is the road network to access these facilities, particularly from areas without any public transport.

3. Seeking to expand visitation to places like Dorrigo National Park must be accompanied by funding of additional infrastructure to support the increase in visitation.
4. There are a range of arts and cultural events that are a key source of tourism in Bellingen Shire (Folk and Bluegrass Festival, Music Festival, Art Urunga Sculpture in the Park et al) and across the North coast. Funding for these events from State level would help ensure their viability and the ongoing tourism potential in towns and centres
5. Dorrigo has potential for development of its historic train collection and rail line for tourism.
6. The clustering of allied health with hospitals is a sensible proposal however if the location of the hospital is subject to flooding events this may exacerbate difficulties in emergency response situations.
7. The concepts for education in the plan are supported however representatives from Education should be involved in the more detailed planning particularly in relation to changing patterns of demand and delivery.
8. Similar to the far north coast the mid north coast has a concentration of creative professionals. Fostering the creative industries through State government support of artists, events and cultural activities and trails will grow this aspect of the economy further.
9. The growth of knowledge industries together with the national broadband network, is currently resulting in an increase in home based businesses and a desire for co-working meeting places and/or periodic use serviced meeting, training or conference facilities. Broad scale business park development may not be as important in the future as a series of smaller co-working business hubs.
10. The Plan refers to the mid north coast having a World Class Tourism Industry. This is incorrect and gives a false impression. While the mid north coast has excellent tourist attractions – primarily nature based, the built infrastructure (accommodation especially) is aging and doesn't currently meet visitor expectations across the board. The plan should be looking at means to attract investment to the region.
11. The Plan doesn't address the level of red tape which is an impediment to development and investment. Three tiers of government have committed to reducing red tape to benefit business. However there hasn't been any research on the current level of red tape, its effect on deterring business nor any strategies to significantly reduce it.

Goal 5 –Improved transport connectivity and freight networks

1. The commitment to work with transport operators and community transport providers to investigate a range of delivery models for flexible transport is welcomed. However the commitment needs to go beyond investigation to being willing to fund transport options in areas without public transport. Currently the Dorrigo plateau area is the most distant from the nearest regional city without public transport and only a one community transport bus on one day of the week service. Funding to improve transport access particularly for the Dorrigo plateau is needed.

Recommendations

1. The plan needs to be renamed North Coast *Land Use* Regional Plan as its focus is on land use.
2. Include in the plan that the State Government will provide more comprehensive demand information (from community survey, local community engagement feeding into regional level, survey of real estate agents, data on growth in reach of fast broadband speeds and on line businesses etc) and to guide the plan considerations, directions and actions such as:
 - wellbeing, ideas, needs, aspirations or priorities of the existing north coast population for the future of the land use of the region
 - the reasons people move to the north coast region and whether those reasons and associated factors will remain constant for the next 20 years
 - the types of housing the current retirees moving into the area are seeking and whether the housing type sought by those moving in in has changed over time (last 5-10 years)
 - current and potential impact of access to fast broadband and online business development, expanded education opportunities and more jobs located regionally on the age profile of the growth of the region for the next 20 years
 - age profile of aeroplane travellers to and from north coast regional airports and tourists to the north coast over last 5 yearsas a concentration on supply side planning means the plan is not holistic in approach and lacks relevant information on clearly emerging trends.
3. Include in the plan that the State Government will provide broader representation from both local government and from agencies such as Health, Housing and Education at state level in the structure for the delivery of the plan. Each Council is autonomous therefore a representative from each council is needed for the structure to have the necessary authority.
Human services agencies such as Housing, Education and Health that have key roles and expertise would make a better informed coordination and monitoring committee implementation and regional cities structure.
4. Include in the plan expanded details on the maps provided to include the town of Urunga on all regional maps and provide more identifying details around the areas specified as suitable for mining activity. Include identification of the Clarence – Moreton basin as a potential coal seam gas on Figure 7 on pages 32-3 as it is a specifically referenced resource. .Correct the error in the Figure one map which shows the incorrect colour hatching for the Dorrig National park World heritage area.
5. Include in all parts of the plan consideration of the full range of Infrastructure needed for the region such as waste facilities and capacity, sewer facilities and capacity, and telecommunications facilities, capacity and reliable speed and social and recreational facilities as well as the housing, transport, water and electricity that the plan concentrates on.

6. Include in the plan consideration of any terrestrial species under threat as well as aquatic species under threat
7. Include in the plan strategies for dealing with potential conflict over water use and/or potential land and water contamination issues that may be revealed through expanded land investigation or development.
8. Include run of river hydroelectric systems in all aspects of the plan that relate to renewable energy systems.
9. The plan to include the method of how the plan 'will work with councils ' to achieve its goals at a local rather than for the regional level .
10. The plan needs to include an explanation of how the stated *natural qualities* of the cities differ so significantly from the rest of the region as to determine that growth will predominantly occur in the regional cities. Alternatively as noted in recommendation 2 above demand information needs to be included to substantiate the statement made.
11. Include in the plan an explanation of how promotion of employment growth in health, education, aviation and other services will be achieved and how drive future prosperity. (e.g Do the projected over 65 year olds fly more than the current age profile population?)
12. Include in the plan an explanation of how the growth of inland towns will be encouraged.
13. Include in the plan more specific details of how NSW Government will be working with councils to deliver supporting infrastructure.
14. Include in the plan that action on jobs growth should be dispersed throughout the region consistent with the current distribution on where the population considers it is already a great place to live and work. (It is noted the plan states 43% of the regions population lived in the regional cities in 2011 and the cities provided 42% of the jobs, therefore the cities are not necessarily automatic employment generators.)
15. Provide a definition in the plan of what is meant by 'higher order' commercial services and 'higher order' cultural and civic services and 'higher order' employment opportunities..
16. Include some explanation in the plan of why Coffs harbour appears to be doing proportionally better at generating jobs than the other cities so that the information can be shared.
20. The reference to regional centres and towns in the plan expand to include each centre and town is distinct and has its own character, options and features as do each of the cities. Rather than being just complementary to the regional cities, the

centres and towns provide options for a clear, individual distinctive choice of environment, lifestyle, character, community and housing.

17. State Government investing in services and infrastructure in the plan has to include provision for all areas not just the designated cities as data in the plan shows cities generate proportionally less jobs than their proportion of the population. Additionally, concentrating jobs in the cities may just mean there are more people travelling further on lesser quality roads in greater traffic volumes to access city based services.
18. Include in the plan that urban growth areas must have a designated minimum amount of green or open space even if there is also open space outside the growth area otherwise the opportunity for developing community and social interaction will be minimised and the character of the area will be substantially different to the environmental values that are a factor in attracting population growth.
19. Include in the plan that State Government will play a role in funding the provision or expansion of such as community, cultural, arts, sport, recreation and human services as part of creating great places to live and work.
20. Change the first focus for walking and cycling facilities from the regional cities to the towns and centres as the cities already have higher grade walking and cycling facilities.
21. Include in the plan access to the NSW Government's Housing Acceleration Fund to be able to fund new infrastructure to support housing supply for all Councils that have urban growth areas or larger scale developments occurring over next 20 years.
22. Aged care facility provision needs to be considered and addressed in the plan to meet the plan's prediction of 90% of population growth will be over 65 years of age throughout the next 20 years.
23. Include in the plan consideration, planning and funding of required infrastructure such as waste management, sewer, telecommunications and community and cultural facilities not mentioned in the Governments actions but needed for populations that are growing.
24. Transport planning in the plan for education and health precincts throughout the region has to include road access to the precincts from the towns, centres and out of town areas.
25. State Government support for arts and cultural events that attract tourism is a factor in the viability of the events so include in the plan the State Government will provide or continue support for such events.
26. Include in the plan consideration of the tourism potential of the Dorriggo Rail assets
27. Include in the plan the State government will continue to foster the development of a range of creative industries and events.

28. Include in the plan funding options to expand transport access and connectivity particularly for areas of Bellingham that are currently poorly serviced.