

1 June 2016

Director Regions
Northern Coast
Locked Bag 9022
Grafton NSW 2460



Dear Sir/Madam

Submission to the Draft North Coast Regional Plan in relation to Cumbalum Urban Growth Area

Thank you for the opportunity to make a submission on behalf of Intrapac Property Group to the Draft North Coast Regional Plan currently on exhibition.

Elton Consulting, on behalf of Intrapac Property Group, welcome the introduction of the Regional Plan for the development of the Mid North and Far North Coast that outlines a vision, goals and actions that focus on a sustainable future for the region. We also welcome the direction that new housing will:-

- » be accelerated in the cities and in other centres across the region to optimise existing infrastructure,
- » meet the community's different housing needs and
- » improve affordability with the identification of a number of new release areas including Cumbalum, Kings Forest, Cobaki, Brimbin and Thrumster to meet this demand for housing.

Intrapac Property Group is currently involved in the development of development of land within the Cumbalum Area; specifically Cumbalum Precinct A which will deliver up to 820 dwellings as part of an integrated residential development. Work is well underway on the subdivision and master planning of the site which is anticipated to commence construction in 2016/2017.

Intrapac welcomes the identification of the Cumbalum Area on the Draft Plan's Urban Growth Area Map (Figure 30 in Appendix B). Cumbulum A (also known as Cumbalum Views) has already been rezoned and therefore is no longer 'Proposed Urban Land' but rather a growth area that is accommodating growth in the Ballina region.

Intrapac are also concerned that the list of Priority Land Release Areas identified in Appendix A does not include Cumbalum Precinct A as an area identified for infrastructure investment investigations as the provision of infrastructure for Cumbulum Precinct B (which is identified) is linked to Cumbulum precinct A.

Background

The Cumbalum Urban Growth Area as identified in **Figure 1** over consists of three residential precincts: Cumbalum Precinct A, Cumbalum Precinct B and Ballina Heights (Refer to **Figure 1** over).

Ballina Heights is nearing completion with the subdivision of Cumbalum Precinct A at refinement stage. Both Cumbalum Precinct A and B currently have development applications before the Ballina Council.

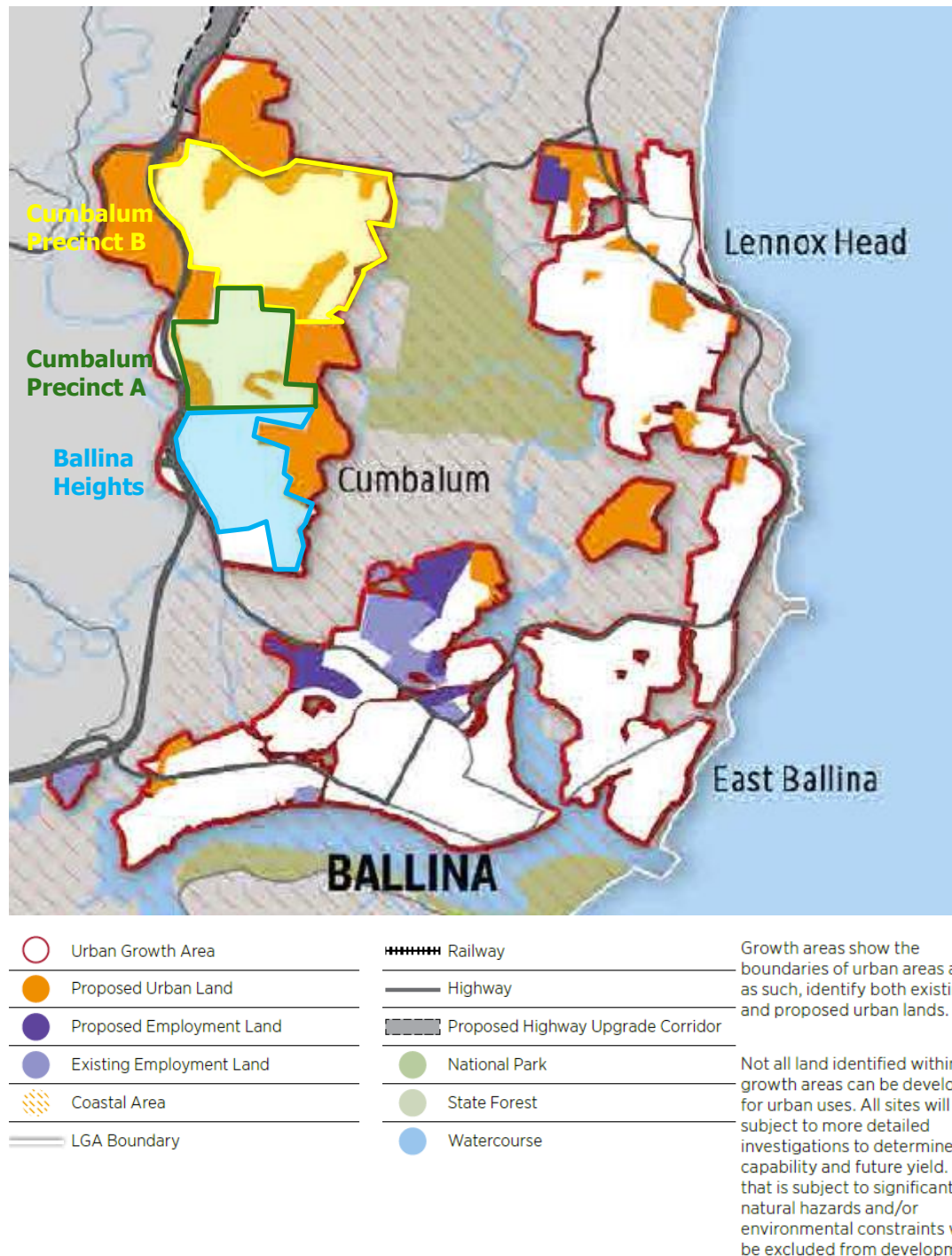
Intrapac are currently in negotiations with Cumbalum Precinct B on the provision of a sewer through Cumbalum Precinct A as there is no other option to service Cumbalum Precinct B but to traverse Cumbalum Precinct A. Intrapac are agreeable to negotiate an access through the



property and provide the necessary easements through their site on the proviso that the Cumbalum Precinct B sewerage lines are complimentary with their development and their development timetable.

Preliminary sewer servicing plans indicate that a suitable sewerage layout can be achieved which will service Cumbalum Precinct B and will not impact on the development of Cumbalum Precinct A, thereby delivering up to 3,306 additional dwellings in the Cumbalum Area. Such a solution can be subject to a legal agreement which will protect the interests of the proponents of both precincts and ensure that the development of neither precinct is jeopardised.

Figure 1 Extract from Urban Growth Area Map for Ballina LGA



Source: Draft North Coast Regional Plan 2016 Figure 30: Urban Growth Area Map for Ballina LGA



**FIGURE 1
STRUCTURE PLAN**

----- Precinct Boundary
— Cadastre

LAND USE

- Low Density Residential Land
- Medium Density Residential Land
- Rural Landscape Land
- Environmental Land
- District Playing Fields (minimum 4ha)
- District Park
- Local Park
- Community building
- Water Reservoir (Council owned)
- Stormwater Retention and Treatment Area
- Collector Road
- Local Access Road
- Future Road Connections
- Cumbalum Link Road / playing field access
- 400m Park Catchment (Local and District)

NOTE

The planned community building is to be integrated with the district park. The location shown on this plan is indicative only.

The area for the planned community building is to be provided additional to the required area for the district park.

Figure 3 Cumbalum Precinct B Structure Plan



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Identification of Priority Land Release Areas

As noted in the introduction above, the Draft North Coast Regional Plan identifies Cumbalum Precinct B as a Priority Land Release Area with the intention that the Department of Planning and Environment would work with councils to identify where investment in local infrastructure may create housing supply in the identified priority land release areas. While Intrapac welcomes such an initiative whereby the Department and Ballina Council would work together to secure the delivery of infrastructure, they have concerns that identification of Cumbalum Precinct B as a priority land release area in the absence of Cumbalum Precinct A could prejudice the development of their site.

While the residential yield of Cumbalum Precinct A is significantly less than the potential yield from Cumbalum Precinct B, it is noted that developments of a similar scale have been identified as priority land release areas (Valla Urban Growth Area in Nambucca Valley and Kew in Port Macquarie-Hastings).

There is no alternative for the servicing of Cumbalum Precinct B but to come through Cumbalum Precinct A, which can facilitate the development of both Cumbalum Precinct A and B in line with the Ballina DCP 2012.

The identification of Cumbalum Precinct A in the Draft Plan as a priority land release area for the purposes of infrastructure investment investigations, would not only ensure that the development of Cumbalum Precinct A is not compromised by Cumbalum Precinct B, but would ensure that a coordinated approach to servicing the Cumbalum Area is adopted.

In line with this, we would also request, on behalf of Intrapac, that the Urban Growth Area Map shown in Figure 1 above be amended to reflect that the area is already zoned and is accommodating the growth in the area.

If you require any additional information on this matter, please do not hesitate to contact me.

Yours sincerely

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