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Director Regions, Northern
Department of Planning & Environment
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Planning Institute Australia - Submission on Draft North Coast Regional Plan

The Planning Institute of Australia (PIA) is pleased to make this submission on the Draft North Coast Regional Plan (NCRP). This submission has been prepared by Members of the Northern Branch of the Planning Institute of Australia NSW Division (PIA NSW).

The Planning Institute of Australia (PIA) is the peak body representing professionals involved in planning Australian cities, towns and regions. The Institute has around 5000 members nationally and around 1200 members in New South Wales. PIA NSW plays key roles in promoting and supporting the planning profession within NSW and advocating at all levels in relation to key planning and public policy issues.

PIA supports the development of the NCRP and its strategic policy direction for housing and economic growth across the North Coast Region. The successful implementation of the plan will provide benefits to the community in respect of housing, jobs, environment, resources, community services and infrastructure provision.

PIA considers that there are a number of areas where the plan can be strengthened. We remain confident that the Department of Planning and Environment (DP&E) can capitalise on these opportunities for improvement and deliver a strong and robust regional plan that will effectively chart the course for the North Coast Region over the next 20 years.

We have identified below a number of key areas that we believe would benefit from further refinement by DP&E.

The Vision

Good strategic plans map out the vision for an area and drive the implementation of actions to achieve that vision. The draft Plan would benefit from the inclusion of a simple vision with a statement that clearly defines the future for the North Coast in the next 20 years. This should be a statement that is easily understood and captures the broad aspirations of community, business and government.

Governance

PIA considers that identifying an appropriate governance structure is a key issue for the NCRP and supports the inclusion of the 'Delivering the Plan' section and the proposal for establishing a North Coast Regional Plan Co-ordination and Monitoring Committee. The NCRP needs to be part of a shared vision with government servicing bodies if it is going to be more than just a guideline for land use planners.

PIA considers that the role of the Co-ordination and Monitoring Committee should also be defined in terms of responsibilities for implementation, monitoring, review and adaptation to changing social, environmental and economic circumstances.

The Actions in the NCRP should be linked to outcomes that define success. Monitoring and reporting should document performance. To achieve this there needs to be less reliance on motherhood statements and generalisations in the Actions. This will provide clarity in terms of what should be done, by whom and when.

The effectiveness of any committee charged with implementing the plan needs strong leadership with objectives and key performance indicators that at the end of each year can relate performance back to demonstrable achievement of the Vision, the Goals and the Directions contained in the NCRP.

The NCRP outlines the Monitoring Committee but is less precise around relating direction, actions, lead agency (IES), key stakeholders (S) and timing. The implementation framework falls short of international best practice. We therefore strongly encourage the Department to include an Implementation Plan for further discussion and review prior to the finalisation of the NCRP.

There are also concerns relating to the composition of the group with local government representation restricted to two LGAs (i.e. one representative from each of the ROCs within the region), whereas the plan includes three distinct sub-regions and three Regional Cities. It is therefore recommended that the issue of local government representation on the Coordination and Monitoring Committee is reviewed as local government are major players in implementation of the draft Plan. It is further recommended that the government should consider elevating the status of the Coordination and Monitoring Committee to an Authority or agency under the Planning Minister (similar to the Central Coast Regional Development Corporation).

Infrastructure

The NCRP in its current state does not include an integrated infrastructure plan. This is a key flaw in the plan and its omission is significant. The inclusion of an infrastructure plan to complement the regional land use plan would be a vehicle to identify key infrastructure priorities, both current and proposed and also be utilised to guide the release of major new urban development across the region. The delivery of infrastructure to unlock appropriately zoned land to cater for the expected population increase and specifically the sequencing of infrastructure provision is vital. Coupled with this is the need for an integrated transport plan that identifies key priorities and includes all modes of transport including road, rail and air transport, private as well as public transport.

The Draft NCRP proposes no forward planning for infrastructure, rather it only deals with committed infrastructure as outlined within the *Rebuilding NSW – State Infrastructure Strategy* (2014) strategy document. Further, the document does not identify employment targets. Setting employment targets would provide commitment to jobs and the

infrastructure that is required to support these jobs and in turn enable monitoring and measurement of success against these targets.

PIA recommends that the Department incorporate more specific Actions in relation to the provision of infrastructure that will enable the Goals and Directions to be achieved. Further to the above there is no allocation of funding identified. Greater confidence would be given if a funding mechanism was identified and further clarification is required as to how infrastructure delivery will be prioritised.

The need to manage existing and future infrastructure to be more resilient to natural hazards is highly desirable. Resilience and climate change as part of the strategies for development or infrastructure provision are not adequately covered in the draft NCRP. The Plan would benefit from the inclusion of some conceptual targets / criteria within the plan to assist in this regard.

The following comments are made in relation to specific goals:

GOAL 1 – A natural environment, and Aboriginal and historic heritage that is protected, and landscapes that are productive

Action 1.1.1. – Identify and manage areas of high environmental value

PIA supports the statement within the Draft NCRP that mapped areas of high environmental value will need to be avoided or offset where more intensive development is proposed.

The Draft NCRP notes on page 19 that it is the intention that:

“the maps of high environmental value areas will also be used to consider opportunities for biodiversity certification and to inform council planning strategies and local environmental plans, as well as the fish community status and aquatic threatened species distributions, the key fish habitat, and marine protected areas maps from the Department of Primary Industries, Fisheries.”

PIA is concerned that the maps are not at an appropriate scale to achieve this outcome as they are too broad. Therefore PIA recommends that the plan should be explicit that the use of mapped areas of high environmental, agricultural and mineral resources should be restricted to flagging potential constraints to development to be addressed in greater detail through the LEP making process.

Action 1.2.1. – Investigate complementary activities in rural zones

PIA supports the draft NCRP intention to investigate complementary activities within rural zones as there is general agreement amongst the planning profession that the introduction of the standard LEP document led to a reduction in the number of uses that had previously been permitted and are compatible with rural activities.

Action 1.2.3 Review the Northern Rivers and Mid North Coast farmland mapping projects and 1.2.4 – Adopt State and regionally significant farmland interim variation criteria

PIA supports the draft NCRP proposal to adopt state and regionally significant farmland interim variation criteria to permit minor variations to the mapped farmland. This will allow isolated pockets of land to be included in urban growth areas where the land does not contribute to agricultural productivity, provided that this occurs as part of an LEP planning process and not a development assessment process. Furthermore it is recommended that it would only be allowed to occur in instances where Council has reviewed the agricultural capability, land use conflict, infrastructure, ecological and environmental risk factors associated with the subject land. This process has the ability to provide flexibility and promote efficient development outcomes.

Direction 1.5 Deliver economic growth through sustainable use of, and access to, mineral and energy resources

PIA recognises the importance of having locally derived extractive resources and energy for the economic prosperity of the region. The draft NCRP estimates four million tonnes

of extractive material will be needed for the Pacific Motorway upgrade alone. We agree that there needs to be better protection for these resources to ensure long term supplies.

However as we progress into the 21st century we believe that all levels of government should be focussing on large-scale renewable energy projects. Therefore references to fossil fuels need to be augmented by the mention of non fossil fuel sources such as wind and solar generation.

GOAL 2 – Focus growth opportunities to create a great place to live and work

Direction 2.1 – Grow the North Coast’s regional cities as a focus for economic activity and population growth

The draft document notes on page 35 that “*The growth of inland towns will be encouraged*”; however we note that there are no new actions or incentives that will deliver that growth outside of the identified regional cities. PIA recognises that the three nominated regional cities are already on track for growth and are able to attract

investment and funding for infrastructure. It is areas outside of the regional cities that require investment and funding to assist or support their growth efforts in order to avoid economic decline and associated social impacts. It is therefore recommended that the plan should explicitly recognise and support the role regional centres such as Ballina, Lismore, Grafton, Taree and Kempsey play in providing residential, rural residential and industrial land that complements the growth of regional cities.

The NCRP should also acknowledge that there is an additional sub-region in the Far North Coast with Lismore as the regional city in that sub-region. Tweed Heads does not function as a regional city for most of the Far North Coast. Lismore is the centre for a range of State government, local and regional services as well as providing a diverse range of medical, professional and recreation services. The Lismore sub-region meets or exceeds all the draft NCRP regional city thresholds for population, dwellings and jobs by a considerable margin when an analysis of urban settlement is undertaken rather than a rigid LGA based analysis.

ACTION 2.3.1 - Focus future growth into the mapped urban growth areas

PIA supports the proposed Urban Growth Area Variation Principles on the basis that they introduce flexibility to consider appropriate urban expansion outside of identified urban growth areas.

ACTION 2.4.3 Review the North Coast Urban Design Guidelines

PIA promotes high quality residential development however is concerned that the commitment to review the existing *North Coast Urban Design Guidelines* will not necessarily promote high quality development that complements the region's climate, natural features, landscape and character. The guidelines have no statutory provisions and often the design features within the document are not reflected in the local councils' development control plans. Consideration should be given to the development of a set of draft residential urban design development controls that are specific to the North Coast and can be inserted into the residential chapters of each North Coast council's DCP.

GOAL 3 – Housing choice, with homes that meet the needs of the changing communities

Direction 3.1 Provide sufficient housing supply to meet the demands of the North Coast

PIA supports the direction of the draft NCRP that sufficient housing supply is required to meet the demands of the North Coast. However some councils have noted that the Draft NCRP relies upon the DP&E population projections to determine housing supply. In some instances, such as in Kempsey, the DP&E population projections detail a lower growth rate for a particular town than the relevant local council figures. Accordingly PIA suggests that DP&E works with North Coast councils to determine the housing supply needs and desires for the regional cities and towns.

GOAL 4 – A prosperous economy with services and infrastructure

Direction 4.4 – Provide well-located and serviced supplies of employment land to expand industry investment opportunities

Action 4.4.1. Provide an adequate supply of employment land aligned with demand

PIA supports the importance of providing an adequate supply of employment land aligned with demand for industry investment opportunities. It is also recognised that the *North Coast Employment Lands Study* (2014) found that overall, there is sufficient supply of employment land to accommodate projected employment growth on the North Coast for the next 20 years. However we note that there are no specific actions in this section of the draft Plan which relate to any commitment to fund servicing of current and future employment lands, in particular industrial lands. Therefore PIA recommends that the plan should include a commitment to prioritise the funding of infrastructure for existing employment land precincts ahead of any new employment land precincts.

GOAL 5 – Improved transport connectivity and freight networks

Action 5.1.3 – Identify freight transport facilities along the Pacific Highway

PIA believes that the intent of this action appears to be in response to local councils wanting to provide a freight transport hub or similar. The action is to encourage councils to identify strategic sites for freight transport facilities that link to existing and future transport-related industry. The draft NCRP provides some locational guidelines to assist this process. There does not appear to be any restriction as to the location of freight transport facilities elsewhere in the region. The preferred locations for freight transport facilities should be identified within the NCRP and appropriate infrastructure investment provided to support the chosen freight and transport facility locations.

PIA welcomes ongoing engagement on the draft North Coast Regional Plan and is happy to elaborate on any of the matters covered in this submission.

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Yours Sincerely

A handwritten signature in dark ink, reading "Marjorie Ferguson". The signature is written in a cursive style with a large, stylized 'M' and 'F'.

Marjorie Ferguson MPIA CPP
NSW President