

1 June, 2016

Secretary  
Department of Planning and Environment  
Level 3, 49 Victoria Street,  
Grafton NSW 2460



Dear Madam,

## RE: Draft North Coast Regional Plan

### 1. Introduction

Elton Consulting is engaged by Intrapac Property, who is in joint venture arrangement with landowner, Gales Holding (hereafter referred to as the Proponent). As the primary interested Proponent owning approximately 80% of the land subject to Tweed Shire Council's Draft Kingscliff Locality Plan, the Proponent is keen to work with the Department of Planning and Environment and Tweed Shire Council to deliver a highly liveable and feasible development outcome in Kingscliff.

The Proponent would like to thank the Department of Planning and Environment for the opportunity to make a submission regarding the Draft North Coast Regional Plan (hereafter Draft Regional Plan) which is on exhibition until 2 June, 2016. As a key stakeholder in the future development of Kingscliff, a locality with strong connections to the South-east Queensland economic corridor, the Proponents key goal is to deliver sustainable and future-proof development at Kingscliff.

As such, this submission outlines the Proponents key comments and recommendations associated with the Draft North Coast Regional Plan. The submission has been structured to respond to primary Goals, Directions and Actions of the Draft Regional Plan for consideration, particularly in the context of the growth of the Kingscliff Area.

We would appreciate consideration of the Proponents submission prior to finalisation of the document.

### 2. About the Proponents' Proposal

The Proponent aims to deliver a robust and thriving community through a best practice, design-led modern coastal village approach at Kingscliff. The future vision and public benefits identified by the Proponents include:

- » Fifty percent of site dedicated to public realm, parks and environmental protection;
- » Effective flood management across the locality;
- » New east-west road (Turnock Street extension) to improve accessibility to Kingscliff Town Centre and beach;
- » Lake-focused recreation precinct including new public realm and housing opportunities;
- » Local job creation across multiple sectors including retail and 21st century industries;
- » Four compact, walkable, mixed-use villages (i.e. neighbourhoods) with a diversity of housing types;



- » Potential new centrally located library / community facility;
- » Interconnected network of walking and cycle trails.

Attached in **Annexure A** are the proposed preliminary Master Planning documents (prepared by Roberts Day) to illustrate the concept and exciting vision for Kingscliff.

### 3. Our Submission

#### 3.1 Draft Plan needs to emphasize the need for housing diversity and flexibility for smaller lots

Goal 3 of the Draft Regional Plan, and the associated Directions (as outlined below) are supported.

##### *Direction 3.2 Deliver housing choice to suit changing needs,*

*Key points outlined in the Draft Regional Plan include:*

- *Deliver housing suitable for the aging population including age in place options as well as provide opportunities for retirees;*
- *Council-led land release and growth management strategies need to identify housing needs and a diversity of housing typology;*
- *Smaller, innovative land and house design should be provided.*

*The key action is to investigate the plans, policies and investments that would support greater housing diversity with a target of 40% multi-dwelling housing.*

##### *Direction 3.3 Deliver opportunities for more affordable housing*

*The key point outlined in the Draft Regional Plan includes:*

- *Facilitate the supply of more affordable housing including working with Councils to prepare local housing strategies that plan for a range of housing types and that consider local affordable housing needs and strategies.*

#### **Our Response:**

Kingscliff is recognised as being a key location for delivering growth in coastal living opportunities on the North Coast, particularly with the locality's accessibility to the South-east Queensland Economic Corridor.

The Proponents support the concept that future housing should reflect a housing typology and diversity for smaller households, as well as families. In particular the Proponents plan can provide and support the target of 40 per cent of the new housing supply across the region should be in a multi-unit dwelling and terrace format.

The Proponents suggest that maximum flexibility should be afforded to the planning strategy where principles for the Kingscliff locality should include:

- » Noting or enabling development to respond to emerging demands of smaller lot (down to 200sqm) housing products and innovative design
- » Supporting affordable products and a variety of density controls and heights, not just 2-4 storeys.
- » Supporting a flexible zoning such as R1 General Residential Zoning.

The Tweed Shire Council Draft Precinct Plans released in April, 2016 are generally prescriptive in zoning, provide limited opportunity for multi-dwelling housing and does not generally include



innovative small lot products. The Department's Regional Plan thus should reinforce the need for diversity, flexibility and smaller housing options.

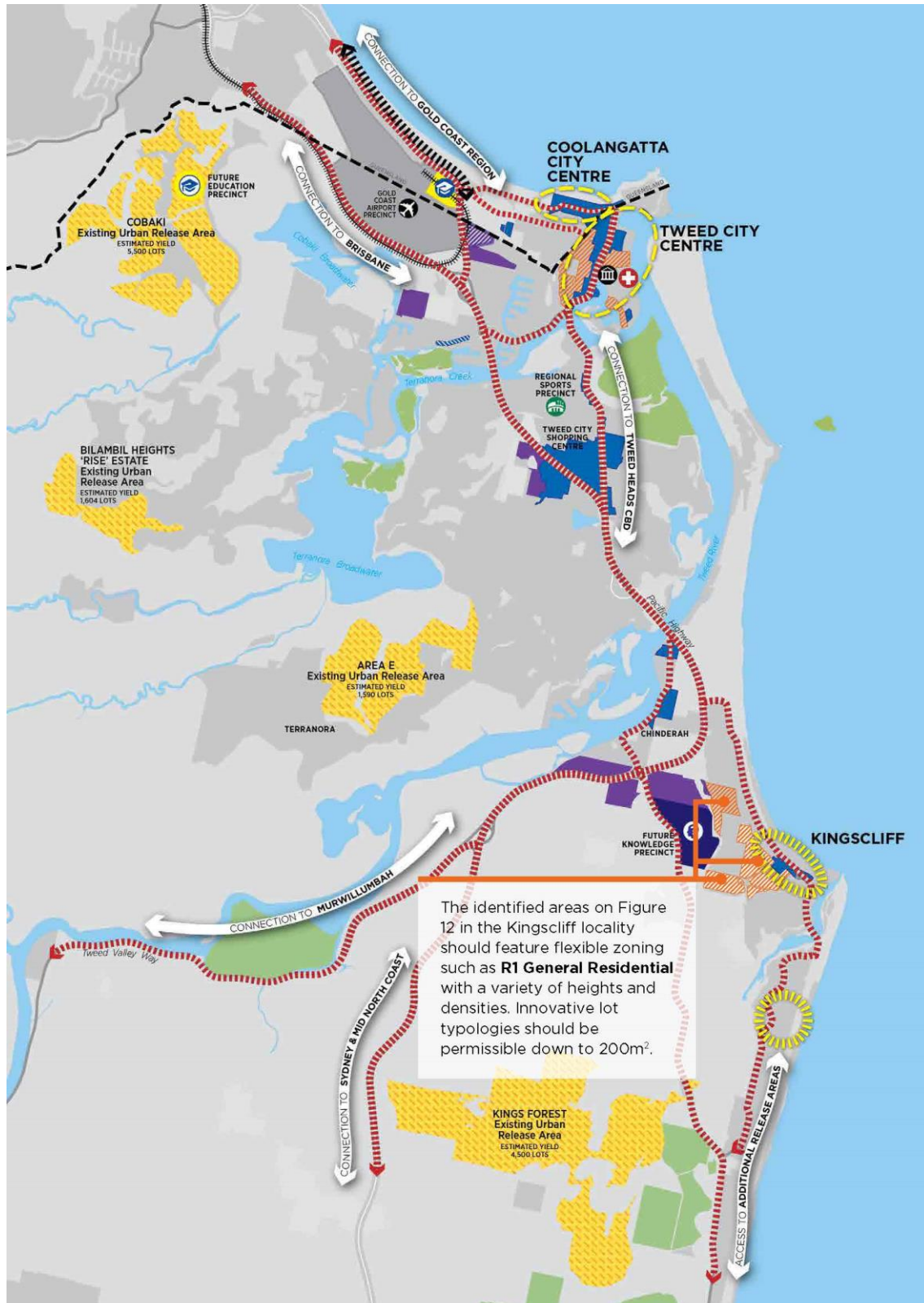
### Recommendations

The Proponents' recommendations to deliver a robust planning framework to meet future population needs includes:

- » Arguably the coastal zone in Kingscliff offers one of the key locations on the North Coast to meet the housing diversity objectives;
- » The Draft Regional Plan should specify in the Kingscliff coastal zone, as identified in Figure 12 (see Figure 1 in this document), maximum zoning flexibility be applied to meet the core objective of meeting encouraging diversity of housing as outlined in [Goal 3 – Housing choice, with homes that meet the needs of changing communities and specifically Directions Action 3.3.1 Facilitate the supply of more affordable housing](#);
- » A greater flexibility and compactness in residential development in targeted areas will also contain development, minimising pressure on significant farmland and other resources in the region, which aligns with a key principle in the Draft Regional Plan [Direction 1.2 Protect and enhance productive farmland](#).
- » In the [Draft Regional Plan Action 2.4.3 Review the North Coast Urban Design Guidelines](#), the guidelines should explore innovative and compact development typologies that will respond to the future demand profile and provide affordable housing options. This should include housing products such as small lot housing (front and rear loaded). Arguably this action should be included under [Goal 3 – Housing Choice with homes that meet the needs of changing communities](#).
- » This should apply to the areas identified in Figure 1 in this document.



- **Figure 1 Draft North Coast Regional Plan Figure 12 modification recommendations**



Extract from Draft North Coast Regional Plan and amendments by Elton Consulting



### 3.2 Expand the urban renewal and Kingscliff growth area

Goal 2 of the Draft Regional Plan is to focus on growth opportunities to create a great place to live and work. The key draft Directions are:

*Action 2.3.2 Identify residential, commercial and industrial uses in urban growth areas by development local growth management strategies*

*Key considerations under this action in the Draft Regional Strategy include:*

- *Directing future growth to locations that can sustain additional development and are readily serviced;*
- *The NSW Government will only zone land for residential, commercial or industrial use if it is consistent with a local growth management strategy agreed between the Department of Planning and Environment.*

*Direction 2.2 Align Cross-border planning with South-east Queensland "Development on the Tweed Coast will continue to provide housing and job opportunities to support growth in South-east Queensland particularly for new residential land release areas and employment land supply*

*Key considerations in the Draft Regional Plan include:*

- *Development on the Tweed Coast will continue to provide housing and job opportunities to support growth in South-east Queensland (with the Gold Coast expected to increase in population by 470,000 persons to 2041);*
- *The influence of South-east Queensland diminishes with distance from the border but is expected to exert growth pressures in localities close to the border (including Kingscliff).*

#### **Our Response:**

To further accelerate these key objectives, the Proponents are of the view that additional future growth opportunities could be identified in the Draft Regional Plan. Most of the urban renewal areas have been part of an identified Tweed Council Draft Precinct Plan. However the Proponents have identified further urban renewal and urban development areas should be included in order to cater for appropriately 3,000 - 4,000 dwellings. The urban renewal areas in Kingscliff can accommodate smaller lots and housing diversity, and not retain the current minimum lot sizes. Further the renewal of the Cudgen suburb and land along Turnock Street can also be considered as approval to fill this area has been provided by Tweed Shire Council.

Figure 12 (as provided in Figure 2 in this document) in the Draft Regional Plan identifies the areas within the Kingscliff locality as urban renewal areas as well as localities to deliver additional housing and employment supply. The Draft Strategy also outlines the need to protect the rural and natural landscape, but make efficient use of land allocated for urban development and close the town centres.

The Proponents proposed modification to the urban renewal area and growth area identification in Kingscliff to provide additional land to link the Cudgen Village, west of the Tweed Coast Road, to Kingscliff town centre.

The key reasons for this are:

- » The Proponents preliminary master planning process has identified excellent opportunities to offer quality lifestyle and recreational benefits in Cudgen Village post sand-mining operation to deliver a lake-focused passive and active recreation space in the future (see **Annexure A**);
- » The future lake-focused area links the Cudgen Village to Kingscliff town centre via a new proposed Turnock Street extension (discussed further in this submission);



- » The proposed road and cycle linkages can be supported by infill and urban renewal in Cudgen and West Kingscliff (discussed further in this submission).
- » The location will have excellent connections with the Tweed Coast Road and the employment lands identified north of the site and the Pacific Highway Corridor;
- » The Draft Strategy in Figure 12 is different to Figure 26 around the Kingscliff area due to the exclusion of the Cudgen area in Figure 12. This should be amended to make the two plans consistent to support urban renewal and greenfield development;
- » The urban renewal and greenfield area will provide diversity of housing, including more affordable housing opportunities.

The proposed amendment will support:

- » Retaining the high quality biodiversity areas;
- » Provide opportunities for management of flooding for the Kingscliff area;
- » Upgrading Tweed Coast Road to support it being flood free and supporting broader residential and economic growth;
- » Encourage broader cycling and pedestrian linkage into Kingscliff town centre;
- » Providing housing and employment opportunities.

### **Recommendations**

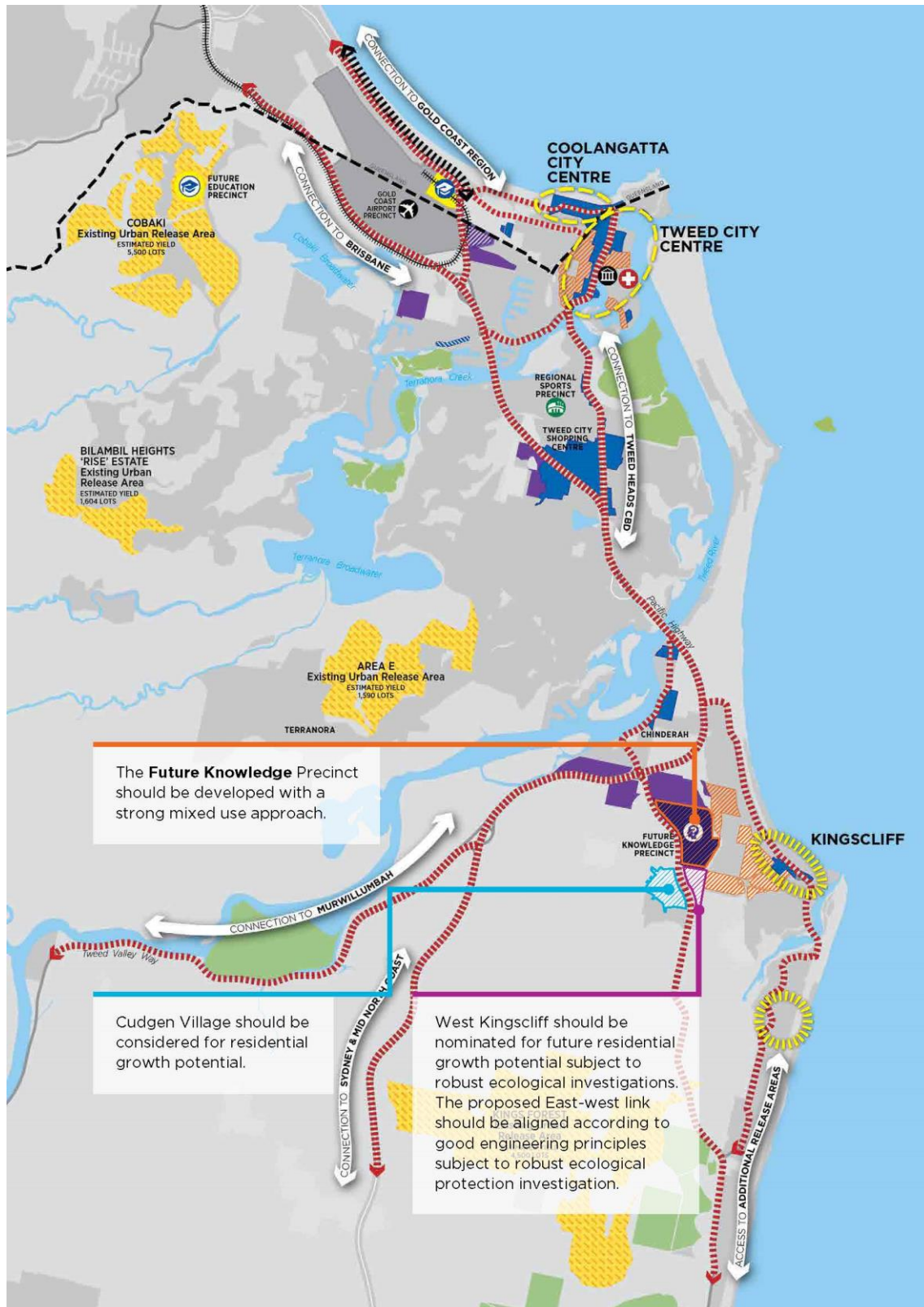
The Proponents' recommendations to maximise quality residential opportunities in the Draft Regional Plan would be:

- » To amend Figure 12 to identify Cudgen Village and further land east of the Tweed Coast Road as offering potential for growth and align with Figure 26 in the Draft Regional Strategy (West Kingscliff discussed in the next section);
- » As previously outlined, the Draft Regional Plan should specify maximum zoning flexibility in Cudgen Village to meet the core objective of meeting encouraging diversity of housing, especially considering the extensive active and passive lifestyle opportunities the locality can provide post sand-mining operations (see Annexure B and Figure 2);
- » Development around Cudgen Village will not be contrary to Draft Regional Plan **Direction 1.2 Protect and enhance productive farmland** once sand-mining is complete and will effectively re-purpose this land.
- » Figure 12 in the Draft Regional Plan should be modified as outlined in Figure 2 of this submission.





- **Figure 2 Draft North Coast Regional Plan Figure 12 recommendations to facilitate greater housing supply in the Kingscliff locality**



Extract from Draft North Coast Regional Plan and amendments by Elton Consulting



### 3.3. Need to balance the natural environment, high quality conservation land and land for suitable urban development

Goal 1 of the Draft Regional Plan is to ensure high environmental value lands are protected, and the action is to identify and map such lands of high value.

#### *Action 1.1.2 Identify and map area of potential high environmental value and Aboriginal and historic heritage in proposed urban and employment land*

*This key action identified in the Draft Regional Plan will ensure:*

- *The Office of Environment and Heritage will review proposed urban and employment land to identify environmental value and Aboriginal and historic heritage value;*
- *Prepare maps detailing the consideration of the above.*

#### **Our Response:**

##### 3.3.1 Appropriate vegetation mapping

The Proponent supports the protection and management of the high conservation value vegetation. However, a clear evidence base is required for the Kingscliff locality in terms of mapping the high environmental value land.

The Proponent has obtained advice from Ecological Australia regarding West Kingscliff. The experts confirm the remaining vegetation on the Proponent lands has been subject to extended periods of disturbance as part of the historic and continuous agricultural use of the sites. Two main vegetation communities are located on the site, neither of which are protected under the Threatened Species Conservation Act 1995 or the Commonwealth Environment Protection and Biodiversity Conservation Act, 1999. The Proponent includes a copy of the ecological survey map based on Ecological Australia's work at the locality. This is included in **Annexure B**.

However, in the Kingscliff Locality Plan – Draft Precinct Plans developed by Tweed Valley Council, an extremely broad interpretation of ecological significance has been utilised to develop urban footprints in West Kingscliff.

Rezoning assessments should incorporate a quantitative assessment that demonstrates how the 'improve or maintain' test is achieved. Council do not appear to have undertaken a thorough assessment. Council have sought to retain close to all vegetation and in some instances, are actively seeking to rezone existing employment and residential lands to environment protection. As such, the draft Plan seeks to retain close to 100% of the vegetation on the site, regardless of its age, quality or strategic value.

A balanced approach to retaining good and threatened species and appropriate development provides the ability to deliver the suite of public benefits initially proposed through both a significant reduction in development footprint and impacts on proposed infrastructure.

##### 3.3.2. West Kingscliff Precinct – Development Footprint

The Proponent supports the protection and management of the high conservation value vegetation to the south of the main east-west drainage channel in West Kingscliff. Similarly, it supports the provision of a riparian corridor commensurate with the requirements of the Water Management Act 2000, and linking this area to the northern boundary of the West Kingscliff Precinct and beyond.

However, a smaller area of regrowth vegetation is located to the north of the main east-west drainage channel, adjacent to Tweed Coast Road. This vegetation is of lower conservation value, being of young age, low native diversity and exhibits high levels of weed invasion, particularly on the margins of the vegetation.





The vegetation located on the northern part of the site is generally quite open and is extensively grazed. High levels of exotic grasses dominate this site and this area is of low conservation value and low long-term management viability.

As such, the Proponents suggest that a thorough evaluation of the ecological significance of West Kingscliff be examined to assess its potential for residential development.

### 3.3.3. West Kingscliff - New Connection Road

The quantitative assessment outlined above for the West Kingscliff Precinct should inform the positioning of the new link road between the Tweed Coast Road and the roundabout at the western end of Turnock Street.

Under the Kingscliff Locality Plan - Draft Precinct Plans two alignments have been proposed for this road to avoid areas of vegetation, whereas the Proponent has expert advice that suggests some of this vegetation is not of high strategic ecological value. Neither of these alignments produce optimum access, and both ignore good engineering design practice, particularly at the Tweed Coast Road intersection. Subject to the conservation value investigations outlined above, there should be a balanced approach to ecological, social and economic considerations to both the development footprint and infrastructure in West Kingscliff.

#### Recommendations

- » The Proponent supports the conservation of land south of the drainage channel and the north-south conservation and drainage linkage in West Kingscliff;
- » A quantitative assessment of conservation value of land to the north of the east-west drainage channel should be undertaken to ascertain the conservation value, and if it can meet the 'improve and maintain' test, or if it should be developed to assist funding of improving and maintaining other ecological resources preserved under the planning framework.
- » If the subject land is not of high conservation value then this land should be identified in the Draft Regional Plan for future residential and identify the east-west link connection in the optimum alignment as shown in **Annexure A**;
- » If identified as being suitable for residential development, maximum zoning flexibility should be applied to increase housing diversity;
- » Figure 12 in the Draft Regional Plan should be modified as outlined in Figure 2 of this submission.



### 3.4. Need for provision of employment and suitable mixed use land

Goal 4 is ensuring a prosperous economy with necessary services and infrastructure. The Directions are:

#### *Direction 4.2 and 4.3 Develop health services precincts and enhance education precincts*

*Key relevant points under the Draft Regional Plan include:*

- *Develop health services precincts so that services can be devolved to smaller facilities that can support the major hospitals and that are accessible to the population;*
- *Support health services precincts by attracting complementary uses in these precincts, including accommodation;*
- *Work with education providers and councils to create education precincts that support campuses;*
- *Introduce planning controls that encourage clusters of related activities such as research institutions, applied research and development organisations, and student accommodation.*

#### *Direction 4.4 Provide well-located and serviced supplies of employment land to expand industry investment opportunity*

- *Key relevant points under the Draft Regional Plan include:*
- *Provide well-located and serviced supplies of employment land to expand industry investment opportunities;*
- *Provide an adequate supply of employment land aligned with demand.*

#### **Our Response:**

The Proponent is concerned about the extensive area nominated for employment and the Future Knowledge Precinct in Figure 12 of the Draft Regional Plan. It is understood that an alternative site at Cobaki Lakes has been selected, south of Kingscliff, for a university campus, thus identifying a large area dark blue on Figure 12 will undermine the educational uses at the Future Knowledge Precinct. The Draft Strategy nor the Draft Council Kingscliff Locality Plan – Draft Precinct Plans does not provide justification for the extent of the employment or the Future Knowledge precincts.

A quick assessment undertaken indicates that the proposed knowledge centre area (dark blue) is approximately 58 ha in extent. If this is compared to other knowledge centres such as Bond University in Queensland (approximately 19ha), UWS in NSW (38 ha) or UTS in Sydney (11ha), it is likely that the proposed area is extensive and thus should be identified as a key precinct with more flexibility in future uses, and thus be a mixed use precinct including residential, knowledge and employment uses.

The Proponents recognise and support the employment lands in Figure 12 due to the access to the Pacific Highway Corridor. This well-located land is suitable for attracting employment opportunity in Kingscliff and more broadly in the Local Government Area. The Proponents understand from discussions with Council that several enquiries regarding potential transport and logistics operations have been made to Council and this is an opportunity that Council would naturally like to harness.

MacroPlan Dimasi commissioned by the DP&E in 2014 estimates around 2.9–3.8 hectares of commercial, 14.5 hectares of retail, 11.6-15.5 hectares of industrial and 2.9–3.9 hectares of special uses land will be required by 2031 in the Tweed LGA<sup>1</sup>. This equates to 37.7 ha across

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<sup>1</sup> MacroPlan Dimasi (2014) North Coast Employment Land Review – Section 3 Tweed Coast Analysis



the entire LGA whereas the nominated area in North Kingscliff equates to significantly more than this estimation.

As such the Proponent makes the following recommendations regarding the employment area and Future Knowledge Precinct.

### **Recommendations**

The Proponent recommends:

- » Economic feasibility of business, health and education uses needs to be thoroughly assessed before such an extensive area is ear-marked for those purposes. For this reason the precinct land uses should provide more flexible uses to accommodate a mix of uses;
- » While the landholding does have a good position in terms of access to the Pacific Highway, this attractiveness decreases considerably the further your move away from that corridor. As such, the Proponent suggests that business uses and Knowledge Precinct should be limited to the land surrounding the existing industrial precinct;
- » The Proponents understand Council is working towards releasing the land west of Tweed Coast Road for business purposes, which the Proponent support due to its immediate access to the Pacific Highway Corridor. This makes it more imperative that an economic assessment of demand is undertaken to ensure there is not an over-provision for business use further away from that corridor;
- » The Business/Knowledge Precinct will enable the externally-driven employment opportunities, but will also be attractive to some local population-driven businesses, if it is supported by surrounding residential development;
- » Thriving population-driven employment servicing local residents' needs would be likely to represent at least of 60% of the generated employment, providing an increased depth of employment typology. However, for this type of employment to be viable, this new centre would need to be supported by a mix of land uses including substantial residential development to deliver a vibrant and active live/work hub;
- » North Kingscliff should deliver affordable and diverse housing opportunities capitalising on future local employment opportunities at the locality which is also accessible to those within the South-east Queensland region.
- » Figure 12 in the Draft Regional Plan should be modified as outlined in Figure 2 of this submission.



#### 4. Conclusion

The Proponents sincerely thank the Department of Planning and Environment for considering our submission and would welcome an opportunity to discuss the issues raised further.

Please contact Jenny Rudolph, Elton Consulting, on 02 9387 2600 or [jenny@elton.com.au](mailto:jenny@elton.com.au) for further clarification or discussions regarding any of the recommendations the Proponent has made.

Yours sincerely

Jenny Rudolph  
Director  
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# Annexure A – Intrapac Master Plan





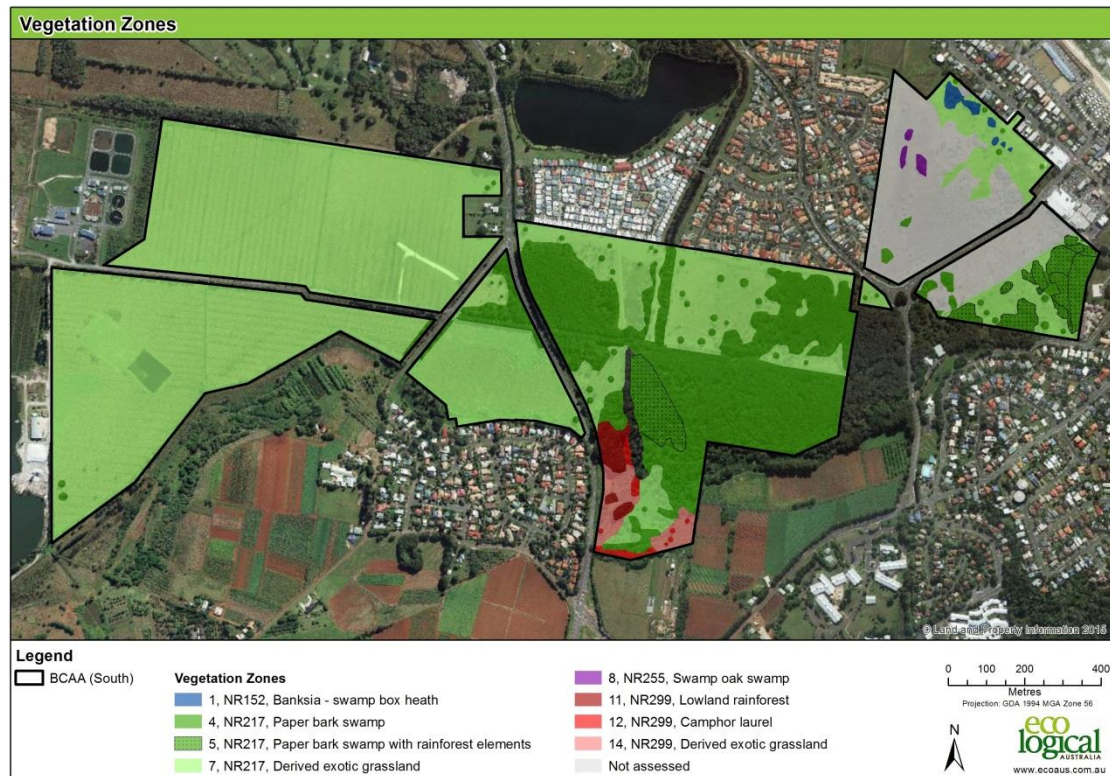
# Gales kingscliff and Gales holdings Key Sites Whole of Settlement

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# Annexure B – Ecological Map (Ecological Australia)



Ecological Australia