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NSW Department of Planning & Environment

Dear Sir/Madam

**Submission – Draft North Coast Regional Plan**

This submission strongly supports the initiative within the draft plan to allow for justified variations to the Farmland Protection policy.

Unfortunately, the effective five class agricultural land rating system was replaced by the Farmland Protection policy some years ago. The Farmland Protection policy has proven to be an obstacle to achieving good planning outcomes.

The Farmland Protection policy is too simplistic in its characterisation of agricultural land which resulted in steep rocky vegetated land being classed, for example, as Regionally Significant Farmland.

Its simplistic approach to classifying land has resulted in large areas of land not suitable for commercial scale agriculture being 'locked up' from other legitimate landuses that can positively contribute to environmental, economic and social outcomes for the region. We can provide a range of examples to illustrate this point.

A good example of the failure of Farmland Protection policy is the krasnozem soil landscape (the red soil plateau) in the southern eastern part of Byron Shire and into Ballina and Lismore LGAs. While areas of better quality agriculture land (classes 1, 2 and large contiguous areas of Class 3) should be protected for agriculture, areas of Classes 4 & 5 and non-contiguous small areas of Class3) should be available for a variety of other landuses.

This point is demonstrated by the array of positive landuses and settlement established in this soil landscape prior to the introduction of the Farmland Protection policy. NSW Planning and Council have a long history of 'rezoning' and approving rural settlement in various forms within the plateau lands.

It appears, NSW Planning has now understood this situation. The two most recent closer rural settlement 'rezonings' within the shire agreed to by NSW Planning have been in the Regionally Significant Farmland category of land on the krasnozem soil landscape unit.

We trust the Farmland Protection policy will be substantially reviewed or replaced in the future. In the meantime, the draft plan initiative to permit justified variations is welcomed.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Rob Doolan', with a stylized flourish at the end.

Rob Doolan for  
Balanced Systems Planning Consultants