



Telephone Enquiries to: Tony McAteer

2 June 2016

Director Regions, Northern
Department of Planning & Environment
Locked Bag 9022
GRAFTON NSW 2460

Dear Craig,

Submission – Draft North Coast Regional Plan

Please accept this as Richmond Valley Council's formal submission on the *Draft North Coast Regional Plan* (the Draft Plan). Council welcomes the inclusion of infrastructure; the updating of urban growth boundaries; and the establishment of realistic population projections into the Draft Plan. It also sees extreme value in having a robust and positive regional plan to guide the future direction of the North Coast.

Council believes the Draft Plan covers off on most key issues in the Region although there are some critical areas of concern surrounding:

- the settlement hierarchy of Tweed Heads being a Regional City, with Lismore and Ballina being Regional Centres.
- identification of CSG as a vital industry for growth in the region.
- too much focus on cross border issues at the Gold Coast with little discussion or direction for other South-East Queensland growth areas, such as around Beaudesert and the Scenic Rim.
- too much emphasis on the freight transport along the Pacific Highway and too little regard for other routes such as rail, air, and road, particularly with the Summerland Way into the Scenic Rim South-east Queensland growth area, and for East-West road linkages.

These areas of concern, amongst others, have been critiqued in the following pages, highlighting important points and considerations.

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

- The introductory commentary is orientated solely towards the natural environment and heritage, yet several directions and further commentary under each direction expands the range of subjects to cover off on primary industries such as farmland protection, CSG, extractive industries, and aquaculture. This appears to be a strange combination of topics for a single goal—Consider splitting this Goal between environmental and primary industry based content, or expand on the introductory commentary to cover off on all aspects of the Goal.
- *Direction 1.1 – Protect the environment, and Aboriginal and historic heritage*
 - *Figure 1 - High Environmental Values* identifies National Parks, state forests, watercourses, NSW and Commonwealth Marine Parks, World Heritage, and

'Potential High Environmental Value' land. Action 1.1.1 requires councils to identify and protect areas of 'high environmental value'. This action needs to be considered in context with recent E Zone reviews and 117 Directions. The 'Potential High Environmental Value' land has been captured by OEH at a regional scale of about 1:300,000—An action requiring protection of such vaguely mapped lands should be softened to a consideration roll, and protection where justified in accordance with the final recommendations of the Northern Councils E Zone Review.

➤ *Direction 1.2 – Protect and enhance productive farmland*

- Regionally Significant Farmland (RSF) is protected from urban rezoning by Section 117 Direction 5.3. The Direction allows for inconsistency but only where it is permitted by the *Far North Coast Regional Strategy* or Section 4 of the report *Northern Rivers Farmland Protection Project – Final Recommendations* (Feb 2005). Unfortunately, neither of these options allows for consideration of errors in the original soil landscape mapping, upon which the farmland mapping is derived—Council supports the inclusion of Variation Criteria into the Draft Plan to allow for Regionally Significant Farmland to be used for other purposes.
- One Variation Criteria consideration is the agricultural capability of the land because of isolation from other important farmland—Additional Variation Criteria are needed to allow for consideration of demonstrated errors in the mapping methodology.

➤ *Direction 1.3 – Safeguard aquatic habitats and water catchments*

- Direction 1.3 relates to aquatic habitats and water catchments but the commentary has a strong emphasis on aquaculture—This emphasis should be incorporated into the direction heading and natural water catchment considerations moved to Direction 1.1; or aquaculture included in Direction 1.2 with farmland.

➤ *Direction 1.4 – Adapt for natural hazards and climate change*

- Commitment to funding and stronger policy around Climate Change is needed from the State Government.

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

- Direction 1.5 comments on the importance of having locally derived extractive resources for the economic prosperity of the region. It estimates four million tonnes of material will be needed for the Pacific Motorway upgrade, which places extreme pressure on existing extractive resources and road infrastructure—There needs to be better protection for these resources, and ways to reduce red tape surrounding development of new resources.
- Council supports the fostering and development of both small and large scale renewable energy projects in the Region.
- The community is also generally supportive of large scale renewable energy projects, however, NIMBYism ("not in my backyard") will most likely make such projects difficult to achieve in this Region—Strong leadership will be needed from the NSW Government if such projects are to be realised.
- Council wishes to reaffirm its adopted gas positioning statement which does not support the development of an unconventional gas industry in its local government area—Council strongly urges amendment of the Draft Plan to remove all references to development of a gas industry in the Region.
- Figure 6 shows CSG PELs that have been bought back by the NSW Government. The figure gives an impression that white areas on the map may still have PELs applying—This figure should show all remaining PELs, if any, or clarify that there are no remaining PELs.



- Figure 7 depicts North Coast resources and farmland—The mapping contains several inconsistencies with actions elsewhere in the Draft Plan, for example showing high environmental value land as having potential mineral resources.

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

- The Draft Plan establishes Regional Cities based upon the 3 largest settlements in the Region and expected service delivery. There is no doubt that these settlements play important roles for their surrounding Sub-regions, particularly where the cities are centrally located, however, the Far North Coast functions differently to the other Sub-regions. The Tweed has a strong relationship with the Gold Coast, where they share higher order infrastructure & services, but there is little interaction between Richmond Valley LGA and the Tweed. Higher order services such as health, aviation, business, and employment are provided mainly in Lismore and Ballina which are central to the Sub-region. For example, the North Coast Area Health Service has focused its attention on developing the Lismore Health Precinct; the main campus of Southern Cross University is based in Lismore; and the Ballina-Byron Gateway airport is one of the fastest growing regional airports in the Country—Council urges the Department to recognise Lismore as a Regional City, and consider whether splitting the Far North Coast into 2 Sub-regions might also be warranted.
- *Direction 2.1 – Grow the North Coast's regional cities as a focus for economic activity and population growth*
 - The Draft Plan will reinforce links between Regional Cities and Town/Centres to help accommodate projected population and housing growth across the Sub-regions. Example given is for some employment activities to be located away from the Regional Cities on land with fewer constraints and that's cheaper to supply—This action could result in increasing the volume of daily commutes, place higher demand on road infrastructure, and increase energy consumption along with carbon emissions.
- *Direction 2.2 – Align cross-border Planning with South East Queensland*
 - The Draft Plan has a strong focus on cross border issues between Tweed and the Gold Coast, yet the Scenic Rim area around Beaudesert is emerging as the next important growth area for South-East Queensland (SEQ)—The Scenic Rim and linkages via the Summerland Way need to receive stronger mention in the Draft Plan.
- *Direction 2.3 – Focus growth to the least sensitive and constrained areas to protect natural assets*
 - Council supports the intention to allow variations to the Urban Growth Area mapping with consideration of variation principles.
 - The variation principles seek to avoid risk from constraints including Acid Sulfate Soil (ASS)—The presence of ASS isn't a risk unless it will be disturbed, therefore this appears to be a surprising inclusion.
 - Rezoning of land for residential, commercial or industrial uses must be consistent with a Local Growth Management Strategy (Action 2.3.2). Previous Regional Strategies have supported rezoning's via their Urban Growth Area maps. It was understood this arrangement would continue with the new Plan—Council seeks Action 2.3.2 to be reworded to facilitate implementation of the urban growth areas as identified in either a Local Growth Management Strategy or the Regional Plan.
 - Rural Residential development as a housing choice is recognised in the Draft Plan—Council supports that such development must be located where there

will be minimal impact on farming, the environment, heritage, and landscape values. The Draft Plan also needs to acknowledge other constraints such as extractive resources.

- Rural Residential can only be zoned if supported by a Strategy—Council believes the Variation Principles should equally apply to Rural Residential development as they do to urban land releases.

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

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

- Council embraces population and housing demand projections for its LGA as being far more realistic than those contained within the *Far North Coast Regional Strategy*.
- The Draft Plan identifies residential land release at Casino as a priority for infrastructure investment (see Appendix A). Unfortunately, there is no direct Treasury commitment in the Draft Plan to fund this infrastructure—Council urges the Department as part of its implementation planning to secure funding to implement the Plan, particularly for identified infrastructure projects.

GOAL 4 – a prosperous economy with services and infrastructure

- The Draft Plan has a strong emphasis on the interaction between the Region and the Gold Coast—Unfortunately, the Draft Plan is void of commentary regarding growth in SEQ around the Scenic Rim Region and the need to invest in linkages with the Far North Coast via the Brisbane-Sydney rail corridor and the Summerland Way.

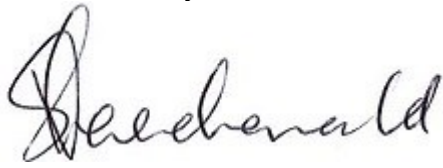
GOAL 5 – improved transport connectivity and freight networks

- Based on the introductory commentary, the Pacific Highway appears to be the sole focus of the Draft Plan—There is no doubt the Highway is a key focal point for freight transport in the Region, but the Plan needs to identify the other freight and transport options available throughout the Region such as:
 - the Sydney-Brisbane rail corridor;
 - Summerland Way linking the Region to the western half of SEQ's growth areas (around Beaudesert);
 - significant aviation precincts including potential aviation based industries at many smaller airports;
 - east-west highway linkages between the coast and tablelands; and
 - to a smaller extent shipping opportunities and maintenance of waterways for our fishing fleets.
- *Direction 5.1 – Strengthen the Pacific Highway's function as a key road corridor of State and national significance*
 - There is nothing in the Draft Plan about assisting bypassed communities to become economically sustainable—This is an opportunity to have this important issue flagged regionally.
- *Direction 5.2 – Expand the region's aviation services*
 - The focus of the Draft Plan is on the core aviation precincts at Gold Coast, Ballina-Byron, Coffs Harbour and Port Macquarie. It seeks to sustainably manage an increase in services while providing for opportunities for aviation-based business growth—The Draft Plan acknowledges a number of other airports at Taree, Kempsey, Grafton, Casino and Lismore but should also recognise other airports in the Region, such as Evans Head, as being (or having the potential to be) aviation precincts.

- *Direction 5.3 – Enhance the connectivity of the region’s road and rail freight and transport services*
- The High-speed Rail network and an extension of the Brisbane metro rail corridor to Coolangatta Airport are identified as future rail opportunities—The location of the metro extension has been provided in Figure 12, but no such figure shows the proposed route of the High-speed rail corridor.
 - There has been much community and Government discussion around the benefits of having the Brisbane metro extended into the Far North Coast Region—The Draft Plan is silent on this matter.

Once again Council thanks you for the opportunity to make this submission. If you would like to discuss this submission further, please contact Council’s Tony McAteer on 02 66600276 or by email at tony.mcateer@richmondvalley.nsw.gov.au

Yours sincerely



Vaughan Macdonald
General Manager