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SUBMISSION ON THE DRAFT NORTH COAST REGIONAL PLAN

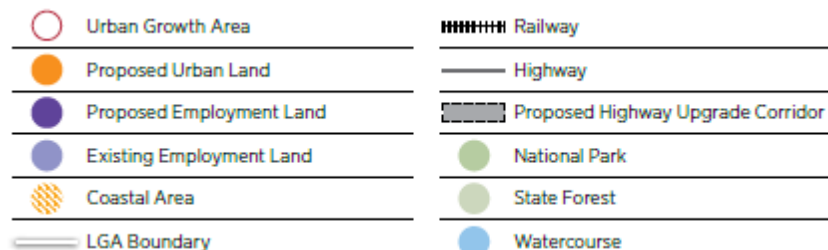
In general, Ballina Environment Society finds the Draft plan very City centric.

BES doesn't mind the Richmond Valley not having a designated City, indeed we have long promoted the communities vision for a Region of Villages.

But it does concern us that the documents vision for Cities to be the 'Thought' and 'Health' and 'Education' and 'Sport' centres, may exclude badly needed services being provided in the Richmond and Clarence Valleys. This apparent inequity is compounded by the fact these services go to Tweed City, duplicate easily accessible facilities of the Gold Coast.

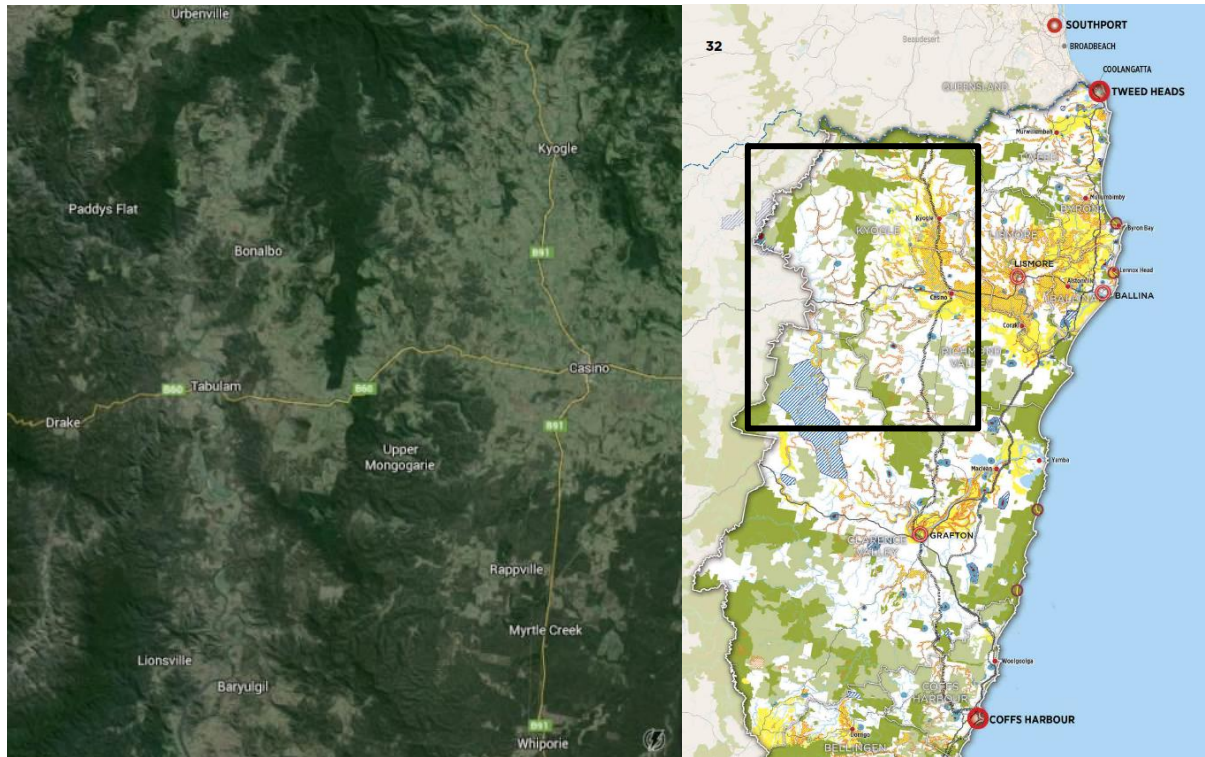


Key to Regional City and Growth Maps



Key to Shire Urban Growth Maps

We question why Casino has become a village, when it services the hinterland west to Drake, south to Whiporie and north to Urbenville. Also Casino is on the rail corridor, indeed it is the junction for the Murwillumbah rail corridor.



Ballina Environment Society was formed in 1982 in response to the Draft Ballina Local Environment Plan excluding Environment Zones on private property, and was incorporated in 1987, the year BLEP87 was released. Therefore it is of great concern that the State Government has put such onerous constraints on five of our Local Council's to justify Environment Zones in the 2006 Local Environment Plan. Please, give us our E zones back!

Given the actions of the State Department of Planning, BES is outraged that Goal 1 - A natural environment, and Aboriginal and historic heritage that is protected and landscapes that are productive, does not extol the principles of Sustainability and the previous commitment to maintain and enhance environmental land values. Indeed the only mention of sustainability in the Goal occurs in Direction 1.5 Deliver economic growth through sustainable use of, and access to mineral and energy resources.

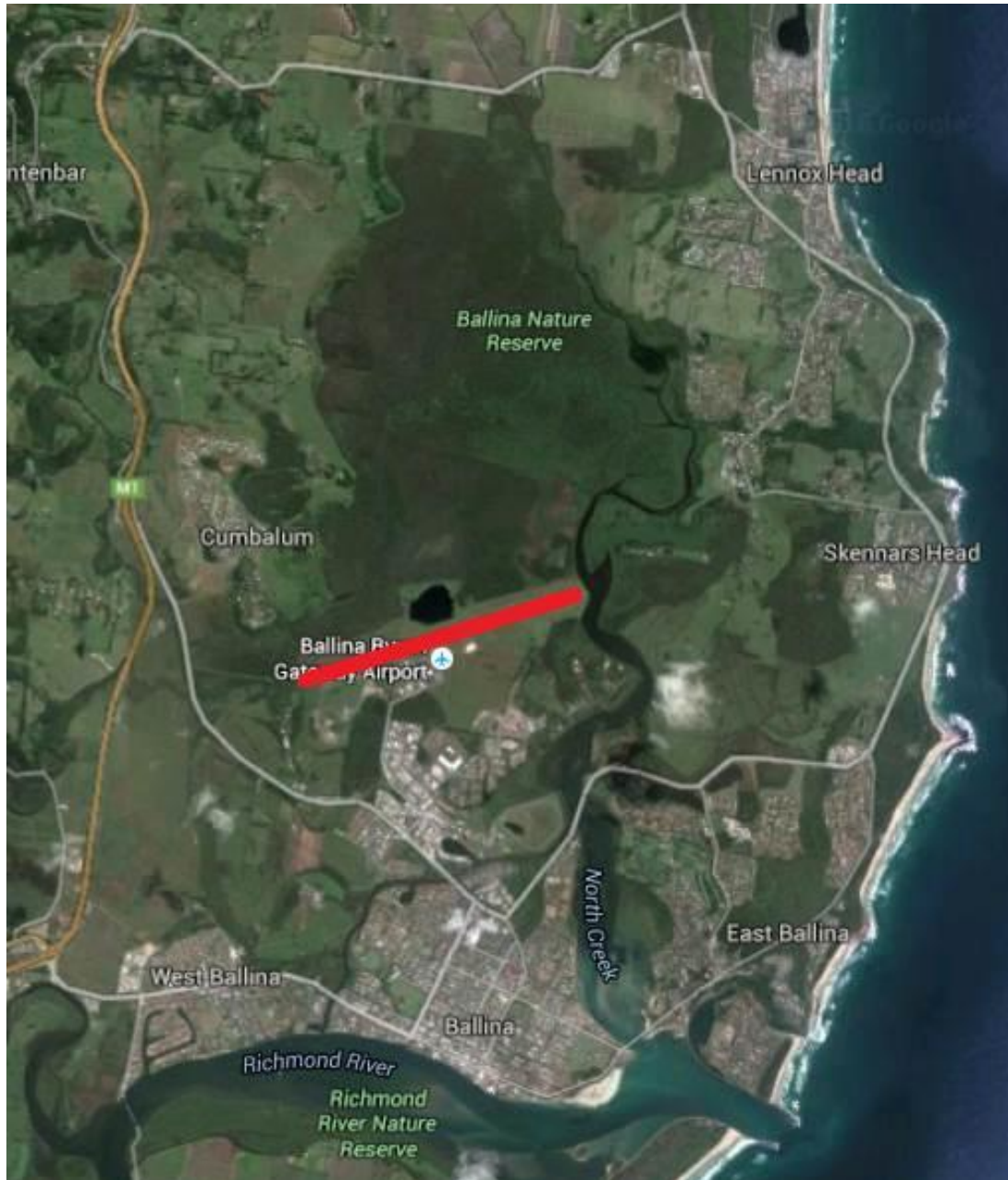
Productive landscapes and mineral and energy resource access and growth should NOT be in Goal 1 but would sit better in Goal 4 - A prosperous economy with services and infrastructure.

If the environment is really Goal Number 1, make the protection of our environment, water, heritage and endangered species a Direction in every other Goal.

ALL mention of a CSG industry should be removed and the North Coast declared CSG Free. Our ecology, farmland and water resource are too precious to risk. Goals of tourism and mining are contradictory. Mining has proved unsustainable in many other regions. Don't prove it here too. Don't forget the draft does highlight the North Coast is prone to natural disasters, particularly flooding.

BES considers the environmental constraints around the Ballina-Byron Gateway Airport should have been highlighted in the case study on page 78 due to the fact it is on the banks of North Creek estuary

and adjacent Ballina Nature Reserve. Instead the cast study only notes proximity to industrial estates, the Highway and the CBD 'making it well-located for an aviation precinct. Indeed the Airport was constructed on land zoned SEPP 14 in disregard to State Government legislation at the time.



The existence of the Airport, without any expansion, has significant ongoing implications for Directions 1.1-1.4.

A broader view of the Richmond Valley infrastructure needs to be taken in the Regional Plan.

The Pacific Highway Corridor, which runs through habitat that is home to the most significant koala populations on the North Coast and another 23 endangered species. The Maps for this zone are very contradicting. Listing the Coolgardie Range as Potential High Value Conservation, then Potential Mineral Resource noting the quantity of materials that will be required for the building of the Pacific Highway.



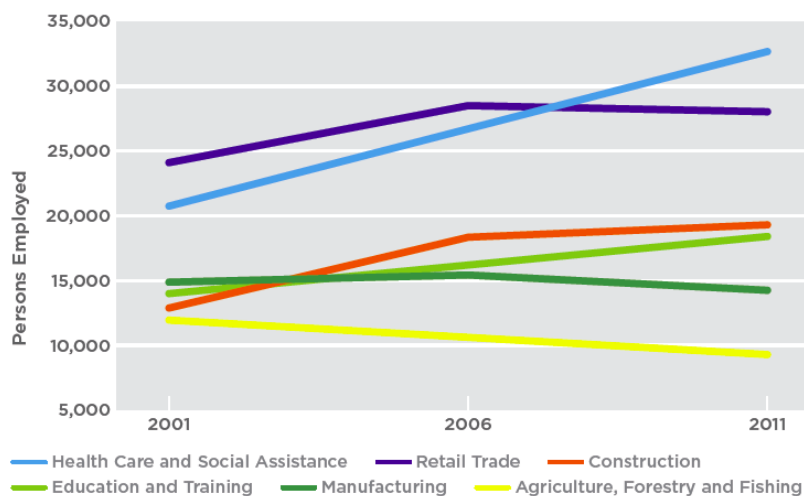
BES is left sceptical of the Department of Planning's commitment to maintaining and enhancing our endangered ecosystems, or to the government's commitment to the Koala Management Plan. There is not one mention of koalas, despite their significance across the North Coast.

There is no mention of the need for a corridor for a Fast Train, so no indication of where, or what the selection process will be. The Highway corridor around Wardell was compulsory acquired BEFORE the Koala and other endangered species reports were commissioned, leaving the consultants and land holders distressed and ultimately dis-empowered.

BES hopes some lessons were learnt for future consultation on a Fast Train corridor.

The Draft NCRP puts a focus on Tourism while noting a decline in retail, manufacture, and the constant decline in Agriculture, pledging their continued support. The plan ignores the needs of the regional hinterland to focus on the three coastal cities.

FIGURE 20: CHANGING EMPLOYMENT BY INDUSTRY ON THE NORTH COAST



Source: Australian Bureau of Statistics

There is little attention to the challenges of siting Employment Lands (the old Industrial zones) next to significant waterways and environmental areas.

Tourism, Agriculture and Manufacturing are all ultimately dependent on the health of the environment. That was the mission of the North Coast Environmental Plan, and should not be usurped by the North Coast Regional Plan.

Our existing rail corridor from Casino to Murwillumbah is noted as having potential for a tourist pathway. Why is no potential noted to reinstate the train? Either way, it is not marked on any map.

With regard to the Committee Structure, BES is very concerned our peak environmental body, the North Coast Conservation Council, is not being offered a seat. Indeed, there are no community representatives on the panel. Looking back at past planning panels and coastal committees, BES does not have a great deal of faith in the proposed structure. These committees are far too often usurped by a Government Minister or given to a Chief Commissioner. Despite our frequent disputes with Ballina Council, BES has not been convinced the State Government intervention has resulted in better local planning.

The NCRP must show it will improve planning and it does not while the Appendix B maps are so inaccurate.

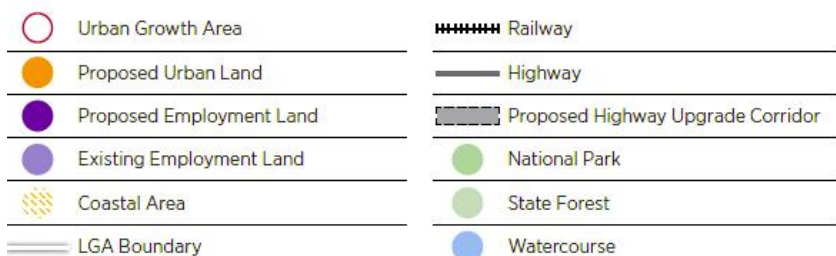
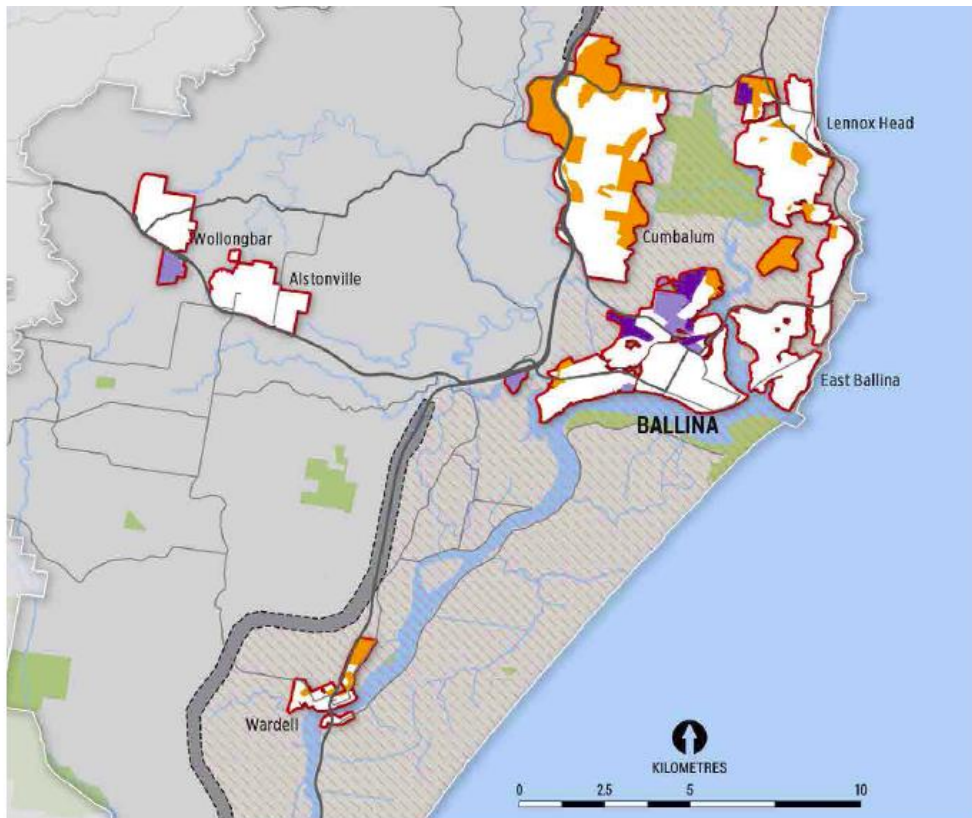
The pressures of development in Ballina Shire is reflected by the amount of land zoned or planned for urban growth, 1,300 hectares, see page 56. In 1987, ALL land considered to have potential for development in Ballina Shire was included in the LEP, and rural residential was prohibited to retain the integrity of the Shire's farmland.

In the process to develop BLEP06 in accordance with the Standard Instrument, it was argued all urban investigation land had development rights and had to be included as Urban Growth Areas.

On the page before the 1,300 hectares is identified, the Plan predicts by 2036 the population growth in Ballina Shire will increase by around 4,000 people. That's pretty big lots, or are some landholders to be given precedence while others are constrained and deceived into getting involved with unrealistic developments?

With few exceptions, land proposed as Urban Investigation in 1982, become Urban Growth. Urban Growth Area Variation Principals on page 49, seem to be all about expanding these areas, with apparently no provision for variations to remove areas which have been found, on investigation since 1982, to not be suitable for urban growth by 2036.

The Urban Growth Map of Ballina Shire, Appendix B - figure 30 identifies land as Urban Growth that has NOT been approved for development, and includes unsuitable land in Proposed Urban Land. BES has fought hard to try to attain a wildlife corridor between the Cumberland Growth Areas CURA A and CURA B. Despite the Draft NCRP Goal 1, our environment is again being sacrificed for development, indeed we are going backwards after all the years of consultancies and considerations.



Growth areas show the boundaries of urban areas and, as such, identify both existing and proposed urban lands.

Not all land identified within the growth areas can be developed for urban uses. All sites will be subject to more detailed investigations to determine capability and future yield. Land that is subject to significant natural hazards and/or environmental constraints will be excluded from development.

Appendix B maps need to be amended to differentiate between brown-field, green-field, under assessment, not under assessment and assessed suitable/not suitable to have any understanding of Urban Growth.

The side comment that 'not all land identified... can be developed' is a platitude BES has heard too often, only to have to battle for reason against the claim that land is zoned for growth and that can't be taken away.

When our representatives attended the Department's half hour Information Session in Tweed Heads, there were no council or developer representatives and the presenters commented on another session. BES can only assume there was a separate session for Community. At the workshop, a question was raised concerning interactive maps online. We were assured they would be available 'When the plan has passed'. BES considers the Department should have had the maps available during the exhibition, Without these the process of public exhibition is inadequate. The interactive maps need to be provided and the public exhibition extended until after they have.

Most of the report is information or rhetoric. There is little understanding of the information to create knowledge and convince the public as to its wisdom. There are errors in the maps. Sustainability needs to be extended to all land use activities.

KEY POINTS:

- LEP E Zones on the Far North Coast need to be resolved and their protection enhanced.
- Direction 1.5 does not belong in Environmental Goals and is a dubious Direction in any Goal.
- Protection of our environment, water, heritage and endangered species should be a Direction in every Goal.
- CSG needs to be ruled out across the whole North Coast, if not the whole of NSW.
- Protection of North Creek and Ballina Nature Reserve needs to take precedence over expanding Ballina-Byron Gateway Airport.
- The Casino to Murwillumbah rail corridor needs to be included on maps
- 'Proposed Pacific Highway Corridor' needs to be updated as built from Ballina to Byron.
- There is a discrepancy between predicted growth (~4,000) and land availability (1,300ha) in Ballina Shire
- Variation Principles for Urban Growth Areas should include principles for removing land from urbanisation.
- Not all land stated as existing urban growth areas has approval for development, nor should it.
- Appendix B maps are too broad brush and need to be amended to include a differentiation between built and unbuilt areas as well as assessed and not assessed.
- The concept is City-centric and leaves the environment and communities of the Richmond and Clarence at risk.
- Interactive maps should be available on the Department's website ASAP, not on approval.
- The North Coast Conservation Council should be invited to join the Committee.

Fiona Folan
BALLINA ENVIRONMENT SOCIETY
President
2 June, 2016