

# Submission on the draft North Coast Regional Plan

Northern Rivers Regional Social Plan Stewardship Group  
& Northern Rivers Housing Forum Steering Group



This submission is presented on behalf of the Northern Rivers Regional Social Plan (RSP) [Stewardship Group](#) and the [Northern Rivers Housing Forum](#) Steering Group.

**The RSP Stewardship Group** brings community and government organisations together to work collectively to improve community wellbeing and attract and facilitate investment for positive social impact in the Northern Rivers region of NSW. It was established in February 2015 to support and manage implementation of the [Northern Rivers Regional Social Plan](#) launched in early 2014. The group has 25 member organisations represented by CEOs and senior managers. Please see the attached update for more information.

**The Northern Rivers Housing Forum** highlights housing issues and needs, identifies challenges, and supports development of innovative and sustainable approaches to address these issues across the region. It facilitates ongoing discussion and dissemination of relevant information amongst key stakeholders and provides opportunities for partnership and collaboration, as well as research and policy development. The forum has representation from across the Northern Rivers region including business, government, non-government organisations and the broader community.

Our member organisations are active contributors to development in the region and are committed to working collectively to improve community wellbeing and attract and facilitate investment for positive social impact in the Northern Rivers region of NSW. A strong regional plan guiding development over the next 20 years is essential to support our work and a sustainable future for Northern Rivers communities. We contribute to regional development as:

- housing developers and managers (including social and affordable housing)
- health and community service providers (including housing support)
- educators
- community development and social development facilitators
- information providers
- employment service providers
- planning and regulatory agencies
- funders and investors.

The RSP Stewardship Group and the Northern Rivers Housing Forum Steering Group are working collaboratively to attract and facilitate investment in affordable housing in the Northern Rivers. This includes activities to encourage and support collaboration between housing providers, developers and investors, and sharing information about housing supply and demand highlighting housing risks, challenges and opportunities for vulnerable households and the whole community.

This submission considers how the North Coast Regional Plan can underpin this work by:

- supporting and facilitating housing delivery that anticipates and meets the needs of our population
- valuing our natural environment and Aboriginal cultural heritage
- supporting development of our transport networks and services
- enhancing community safety through planning and design for housing, centres and communities
- promoting and planning for infrastructure to support community service delivery
- facilitating an integrated and collaborative approach to regional plan implementation and monitoring.

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## Summary of recommendations

- Legislate a mandated percentage of affordable housing of at least 15% all new developments, in addition to support for inclusionary controls in the Regional Plan, to give Councils greater confidence that such LEP provisions will withstand planning appeals. While many Councils are considering or working on inclusionary provisions, stronger State support is required than simply stating that Council's may include them in an LEP.
- Define affordable housing in the plan, including the social and economic outcomes required for affordable housing to be successful.
- Strengthen the planning framework to support adequate safety and security of tenure, and access to employment, services and transport for caravan park and manufactured home estate residents.
- Consider ongoing housing management and running costs in guidelines for local housing strategies.
- Focus more specifically on how housing mix can be facilitated, including through model provisions for councils to use in setting out development options – supporting a more consistent approach to achieving diverse housing stock within communities and across the region.
- Revise or remove the comparison (2.4) stating Tweed Shire offers more affordable housing than South East Queensland in the case study.
- Include specific provisions in the Regional Plan supporting Councils to facilitate residential development that maximises energy efficiency, conserves water, and reduces waste and running costs for households.
- Strengthen the focus on developing renewable and low-carbon energy in Direction 1.5. For example, by specifically including renewables in planning for the infrastructure needs of the energy sector.
- Revise the draft to reflect the NSW Government's intention that there will be no coal seam gas mining in the Northern Rivers.
- Show greater leadership to reinforce the importance of Aboriginal cultural heritage values, including highlight due diligence obligations on all development proponents to conserve Aboriginal cultural heritage, sites and material.
- Give more attention to integrating public and active transport planning with planning for urban and regional development. The plan should lead integration of transport and land use planning by outlining the public transport model for the region that is required to support the framework of cities, centres and towns presented in the plan.
- Reinforce need for development of passenger and freight services across the transport network to meet the needs of the current and future resident and visitor population in the region, reducing reliance on private transport and associated environmental and social impacts.
- Include specific reference to supporting community safety and crime prevention through planning and design for housing, centres and communities.
- Include provisions to support infrastructure to accommodate community service delivery in well-located sites and precincts. This may include strategically located government and other land where a mix of commercial, community, government and/ or residential (including affordable and social housing) uses can deliver strong community benefit.

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The Northern Rivers Regional Social Plan Stewardship Group and the Northern Rivers Housing Forum Steering Group would welcome the opportunity to work with the Department of Planning and Environment and other member agencies of the Coordination and Monitoring Committee to support and inform implementation of the plan.

## Housing

Delivering housing that meets the needs of changing communities is an important priority for the Northern Rivers. Growth in smaller households and older households drives demand for smaller dwellings in many communities. Median weekly household income in the Northern Rivers (\$892 in 2011) is very low at 67% of the NSW median (\$1324). Low incomes and rental vacancy rates drive strong and growing demand for new affordable housing options. We welcome the commitment in the draft plan to work with local government, affordable housing providers and other stakeholders to facilitate the supply of more affordable housing.

Under Action 3.3.1 the draft plan suggests Councils can help to improve housing affordability by including controls in Local Environment Plans (LEPs) that require affordable housing to be included in developments. While many Councils are considering or working on inclusionary provisions, stronger State support is required than simply stating that Council's may include them in an LEP. We recommend the State Government legislates a mandated percentage of affordable housing of at least 15% all new developments, in addition to support for inclusionary controls in the Regional Plan, to give Councils greater confidence that such LEP provisions will withstand planning appeals. Consideration also needs to be given to the proportion of affordable dwellings to be required so it responds to the level of demand for affordable dwellings; and to locating affordable housing with good access to employment, services and transport.

We recommend defining affordable housing in the plan, with reference to relevant policy and research within the NSW and national jurisdictions, to ensure all development proponents and stakeholders have a clear understanding of the social and economic outcomes required for affordable housing to be successful.

Action 3.3.1 also suggests promoting new caravan parks and manufactured home estates as an affordable housing strategy. We recommend the planning framework is strengthened to support adequate safety and security of tenure, and access to employment, services and transport for caravan park and manufactured home estate residents.

When responding to affordability objectives, guidelines for local housing strategies (3.3.1) should consider ongoing housing management and running costs, as well as development of diverse and affordable dwellings. This may include designing dwellings for efficiency (heating, ventilation and water and energy use) and consideration of subsidies for vulnerable households.

Direction 3.2 is focussed on housing choice to suit changing needs in the region. We recommend the plan focusses more specifically on how housing mix can be facilitated, including through model provisions for councils to use in setting out development options – supporting a more consistent approach to achieving diverse housing stock within communities and across the region. Diversity of housing stock includes a mix of dwellings sizes, types/ structure, tenure and costs within individual developments and within villages, towns, regional centres and cities.

The Kingscliff Locality Planning case study under direction 2.4 suggests coastal areas in Tweed Shire offer more affordable housing than South East Queensland. This is not quantified in the draft plan and is misleading, given the very limited affordable housing options in Tweed Shire. We recommend revising or removing this comparison in the case study.

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The draft plan could be strengthened to provide leadership on sustainable neighbourhood and housing design. We recommend including specific provisions in the Regional Plan supporting Councils to facilitate residential development that maximises energy efficiency, conserves water, and reduces waste and running costs for households.

For the Northern Rivers, the RSP Stewardship Group has identified need for a regional housing supply and demand analysis, including assessment of dwelling types, size and location and match/ mismatch to households, future population and employment opportunities in the region, including social and private housing stock. The Department of Planning and Environment (DPE) is an important stakeholder in this proposed work and we would welcome the opportunity to work with DPE to progress it. Results of the analysis will directly inform affordable housing project planning and delivery and support activities of the Stewardship Group and Northern Rivers Housing Forum to promote investment in affordable housing in our region.

## Valuing our natural environment and Aboriginal cultural heritage

Our natural environment and Aboriginal cultural heritage are valued highly in the Northern Rivers. We recommend stronger language in the plan to support these values.

Direction 1.5 mentions potential sources of alternative or renewable energy, which could contribute to electricity generation, reduce the region's carbon foot-print and create new economic opportunities and industries. However, it includes limited specific actions to support development of renewable and low-carbon energy, with the exception of developing tools to identify and map renewable energy potential. We recommend strengthening the focus on developing renewable and low-carbon energy in Direction 1.5. For example, by specifically including renewables in planning for the infrastructure needs of the energy sector. Direction 1.4 could also be expanded from the current focus on climate change adaptation to reducing and mitigating climate change, including through the development of renewable and low-carbon energy.

Relevance of the NSW Gas Plan (mentioned under Direction 1.5) to the Northern Rivers is concerning. We recommend revising the draft to reflect the NSW Government's intention that there will be no coal seam gas mining in the Northern Rivers.

We recommend strengthening the draft Regional Plan to show greater leadership and reinforce the importance of Aboriginal cultural heritage values, including but not limited to, highlighting (within the description directly under Goal 1 on page 17) that all development proponents have due diligence obligations to conserve Aboriginal cultural heritage sites and material, as per legislation mentioned under 1.1.3 and related codes and regulation.

## Developing our transport networks

Transport considerations in the draft North Coast Regional Plan are focussed largely on freight networks and strengthening the function of the Pacific Highway. Little attention is given to public and active transport.

The draft plan refers to the Mid North Coast and Northern Rivers Regional Transport Plans that recognise the importance of investing in public transport to improve connections and help reduce social disadvantage. We recommend strengthening the draft plan by giving more attention to integrating public and active transport planning with planning for urban and regional development, particularly reinforcing the importance of transport to:

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- the success of our higher-intensity urban growth areas
- reinforce the links between regional cities, regional centre and towns – supporting each other's existing functions and growth.

We contend that the plan should lead integration of transport and land use planning by outlining the public transport model for the region that is required to support the framework of cities, centres and towns presented in the plan.

Action 5.3.3 – to Identify and protect future rail corridors on the North Coast – should be reinforced by focusing on need for development of passenger and freight services across the transport network (including rail and light rail) to meet the needs of the current and future resident and visitor population in the region, reducing reliance on private transport and associated environmental and social impacts.

We recommend further consideration of public and active transport in the draft plan in relation to:

- cross-border planning, provision and service support in line with the regional transport plans (p.14, 15)
- good urban design
- supporting accessibility for affordable housing
- planning of health and education precincts and urban/ regional centres, including access from outlying villages
- planning and development of transport networks across the region linking small towns and villages, and within higher intensity urban areas; creating better linkages through timetabling amendments especially for communities west to east and supporting commuter services to reduce traffic congestion and support access to employment and services
- supporting socially disadvantaged communities in the region, including those identified in the Regional Transport Plans (p. 4, 14, 24-25). This is particularly relevant for the villages and towns outside major centres, including but not limited to Murwillumbah, Mullumbimby, Kyogle, Casino, Nimbin, Dunoon, Iluka and Yamba.

## Enhancing community safety through planning and design for housing, centres and communities

Direction 2.4 seeks good design that supports great places to live; helping residents to develop a sense of community and wellbeing. We recommend strengthening the plan by including specific reference to supporting community safety and crime prevention through planning and design for housing, centres and communities, with reference to the [NSW Police Safer By Design Guidelines](#) and any relevant local government area, regional and State policy, plans and initiatives regarding community safety planning and coordination.

## Land and infrastructure for community service delivery

Direction 4.4 seeks well-located and serviced supplies of employment land to expand industry investment opportunities. Census data from 2011 lists *health care and social assistance* and the largest employment

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sector in the Northern Rivers at 15.8 per cent of the working population. Finding suitable infrastructure to accommodate social assistance (community) services is difficult in many parts of the Northern Rivers and needs to be planned for to ensure services and employment in this sector are well-located. This is expected to become more important over the 20 year life of the plan as our ageing population and implementation of the National Disability Insurance Scheme (scheduled for roll out in 2017) drive growth in this sector.

We recommend the plan includes provisions to support infrastructure to accommodate community service delivery in well-located sites and precincts. This may include strategically located government and other land where a mix of commercial, community, government and/ or residential (including affordable and social housing) uses can deliver strong community benefit.

Some community services could also be accommodated appropriately in health and/ or education precincts (4.2 & 4.3).

## Regional Plan implementation and monitoring

The Coordination and Monitoring Committee for the North Coast Regional Plan includes a select number of NSW Government Agencies and the Regional Organisations of Councils. We believe the following objectives are important to successful implementation of the plan.

- Support integrated and coordinated planning and delivery of physical infrastructure for health, education and community services.
- Identify opportunities for social and affordable housing delivery proactively through planning and development processes.
- Engage with Aboriginal communities (including with Elders and Local Aboriginal Land Councils) to support conservation of Aboriginal cultural heritage values, sites and material.

To achieve these objectives we believe it is important to:

- consider including other NSW Government agencies on the committee (including Family and Community Services, Health, Education and Aboriginal Affairs NSW)
- ensure the committee is well informed by relevant local and regional activities and groups to identify and respond to issues, challenges and opportunities for implementing the plan.

The Northern Rivers Regional Social Plan Stewardship Group and the Northern Rivers Housing Forum Steering Group would welcome the opportunity to work with DPE to and other member agencies of the Coordination and Monitoring Committee to support and inform implementation of the plan.

We acknowledge the Traditional Owners of country throughout the Northern Rivers, their continuing connection to land, water, sea and community. We pay respects to Australia's First Peoples, to their unique and diverse cultures and to Elders past, present and future.

NRSDC acknowledges the funding contribution made by NSW Family and Community Services (FACS) through the Community Builders program, which contributed to the development of the Regional Social Plan and enables our organisation to continue to build capacity in the regional community services and health sector.