

DRAFT NEW ENGLAND NORTH WEST REGIONAL PLAN 2036

SUBMISSION FROM ARMIDALE REGIONAL COUNCIL

EXECUTIVE SUMMARY

The following provides an Executive Summary of the main features of the *Draft New England North West Regional Plan 2036* (draft Plan) that council supports as well as key matters that council considers should be included in the final Plan. More detailed comments on specific directions and actions in the draft Plan are provided in Attachment 1.

General

Council supports having a regional plan that identifies the strategic factors influencing growth and infrastructure delivery and provides an overarching framework to guide development and investment in the New England North West over the next 20 years.

Delivering the Plan

Council is preparing plans and strategies that will reflect the needs and aspirations of its community as well as guide council's provision of services over coming years. These plans include its *Community Strategic Plan 2017-2027*, an *Economic Development Strategy*, *Sustainability Strategy* and *Arts and Cultural Strategic Plan as well as a merged LEP*. Each of these will be a critical input into Council's new LEP which will be developed following Council elections in September 2017. Many of the goals and outcomes from council's plans and strategies deal with similar matters to those in the draft Regional Plan. To ensure there is an alignment between State government and council's priorities; a more seamless approach for implementing actions including allocation of resources; and collaboration across governments Council is fully supportive of opportunities that will enable greater local council involvement as part of the final Plan's governance and implementation processes by:

- increasing local council representation on the proposed Coordination and Monitoring Committee.
- involving councils during preparation of the Implementation Plan.

It suggested that the Plan identify how local community priorities could be incorporated into the Plan over time as a result of councils' preparing their local strategies to ensure:

- collaboration between the State government and councils on the delivery of shared goals, and
- the Local Strategic Planning Statements, as proposed in the amendments to the *Environmental Planning and Assessment Act 1979*, complete the line of sight between regional and local strategic planning. As proposed in the legislative changes, the Statements will need to include the planning priorities that are consistent with any strategic plan, including the final Plan, and council's Community Strategic Plan.

Goal 1 – A Growing and Diversified Agricultural Sector

Council supports the goal and directions for a growing and diversified agricultural sector, which is consistent with outcomes from council's *Draft Community Strategic Plan 2017-2027*, in particular that the farming, agricultural and horticultural industries across the region be supported to sustain food security. There is likely to be further outcomes relating to the area's agricultural sector with the development of council's *Economic Development Strategy*.

The intensive fruit and vegetable growing industry is important to the area's prosperity and has the potential to increasingly do so into the future. There is particular potential for new agricultural enterprises where produce is grown in glass houses as well as opportunities for co-location with other industries, such as food processing. The *Armidale Regional Airport Master Plan* has been completed and is currently being implemented. The Master Plan proposes upgrading of the Airport, including a new runway that will allow for larger aircraft (including jets and cargo planes) to use the Airport, thereby providing future opportunities for fresh produce to be air freighted to major urban centres, such as Sydney and Brisbane, and potentially into South-East Asian markets.

For the Guyra community a secure water supply has been identified as a critical component required for intensive agricultural industries to further establish and expand. Two key options involving the raising of the existing dam or the construction of a dedicated pipeline are currently under investigation. The need for and the availability of water supplies in the region needs to be recognised in the final Regional Plan as key infrastructure needed as a catalyst for further economic growth and development of the region's unique horticultural assets. .

Goal 2 – A diversified economy through the management of mineral and energy resources

Council supports the State government's recognition of renewable energy generation opportunities. The Tablelands have been identified as being suitable for wind power generation. However, the Tablelands can also be suitable for solar power generation facilities as demonstrated by an initial proposal for a solar farm generating up to 300MW to be located east of Armidale.

The identification and construction of a renewable energy hub in the New England is considered essential to the growth and competitiveness of the renewable energy sector and council seeks greater endorsement from the State government for this hub to occur.

Goal 3- Communities resilient to change, with housing choice and services that meet shifting needs and lifestyles

Although there has been an ongoing trend of outward migration of young adults and an increasing ageing population, council and its community would like to start reversing this trend, particularly by creating job opportunities. Consultation feedback during preparation of council's *draft Community Strategic Plan 2017-2027* identified key findings, including "*there is a strong community sentiment that more needs to be done to attract new businesses and industries, in order to create a sustainable economy and employment opportunities*". Along with the findings of the *Economic Development Strategy*, Council's *Delivery Plans* will include actions to create a sustainable economy and employment opportunities. In this respect council supports actions in the draft Plan, that focus on diversifying the regional economy, having prosperous urban centres with job opportunities, and attracting and retaining younger people in the region.

While the draft Plan acknowledges the importance of recreational facilities in contributing towards healthy living it should also recognize and plan for the significant contribution that cultural facilities and activities make towards community well-being. A community outcome in council's draft Community Strategic Plan 2017-2027 is that *"events and cultural activities provide the community with an opportunity to celebrate the unique culture and lifestyle of the region"*. Council is currently preparing an *Arts and Cultural Strategic Plan* that will capture the region's cultural vibrancy as well as identify opportunities to strengthen and grow our community. It will support council to foster and strengthen the local arts and cultural industry, making the Armidale region a more creative and vibrant place to live, work and visit.

In terms of housing choice and affordability Council is very supportive of providing a range of housing types for new home buyers through to aging population seeking smaller, more compact housing options. As a regional centre Council recognises that aging residents seeking to remain in the region to maintain social networks and linkages to their communities of interests may seek to locate closer to services, medical facilities and retail within town. Council will seek through the Regional Plan alignment with the State on opportunities to increase housing diversity and where possible greater density in the city centre to assist in revitalising existing commercial areas.

Goal 4 – Prosperous urban centres with job opportunities

Council strongly supports the draft Plan's direction to grow the regional cities of Tamworth and Armidale. Growing Armidale is consistent with the many of the community outcomes in council's *Draft Community Strategic Plan 2017-2027* and will be supported by projects included in its *Delivery Plans*.

For Armidale and Tamworth to grow, prosper and serve the needs of the region, some differentiation could be made between the two centres based on the services they provide and their respective community aspirations and culture, in order to facilitate a complementary rather than competitive approach to regional growth.

Armidale has a high concentration of people employed in education and training and along with having NBN infrastructure in place it is the leading regional education and training hub for the Region.

Enhancing access to jobs, goods and services by improving connections between centres is considered essential to future economic growth and prosperity and community well being. Armidale Regional Airport provides an important passenger and potential freight link to major centres and airports outside the region. Council is fully supportive of further infrastructure investment in the regional airport including the development of a new runway to assist in maximising the economic potential of that facility and its linkages back into the broader north-west New England regional economy. The Armidale Regional Airport Masterplan also foresees further investment in the precinct in the future development of residential, commercial and industrial uses.

While there are train services between Armidale and Sydney, existing passenger and freight railway infrastructure and services should be improved and maintained. Upgrading of Waterfall Way to reduce travel times between Armidale and the Mid-North Coast would assist in attracting tourists to Armidale as well as making Armidale a lifestyle choice for new residents with beaches only a

relatively short travelling time away. As Armidale grows, surrounding towns and villages may also become a lifestyle choice for new residents, particularly if there is improved private and public transport connectivity with Armidale.

Goal 5 – Protected water, environment and heritage

The draft Plan notes that the New England North West has a wealth of environmental and heritage assets that underpin the economy and create a unique lifestyle for residents and visitors. *The Draft Community Strategic Plan 2017-2027* recognises these assets with a community outcome being to protect and preserve the region's unique climate, landscape and environment.

DELIVERING THE PLAN

The draft Plan does not identify a commitment of resources, timeframes and key organisations that will be accountable for implementing each action contained in the draft Plan. It appears that these matters will be identified in the Implementation Plan, although it is not clear which body will be responsible for preparing the Implementation Plan. Presumably the Implementation Plan will involve integration of the large number of actions in the draft Plan that address a diverse range of issues and involve numerous stakeholders as well as setting priorities and timeframes for achieving outcomes. As many actions will require or benefit from local councils' participation and contribution it is considered desirable that councils are involved during preparation of the Implementation Plan.

Councils often prepare local strategies that address issues identified in the draft Plan, for example council is currently preparing its *Community Strategic Plan 2017-2027*, an *Economic Development Strategy*, *Sustainability Strategy* and *Arts and Cultural Plan*. It is therefore considered essential that State government agencies and local councils work collaboratively as part of implementing the final Plan to ensure that local community priorities are recognized and actions at State and local levels are consistent and not duplicated.

In relation to the representatives comprising the Coordination and Monitoring Committee, the relevant State agencies have been identified along with 2 local government representatives determined by the Regional or Joint Organisations of Councils. The region has a population of 182,600 and comprises 12 local government areas. It is recommended that local government representation on the Coordination and Monitoring Committee should be increased (at least doubled) to be proportionate to the role that councils will be expected to have in implementing the Plan. Increased local government representation on the Committee will:

- facilitate a more seamless approach for implementing actions and achieving shared outcomes
- allow for collaboration across governments early in the process, rather than when specific projects and processes are being implemented
- ensure that State and local government plans and policies align so that actions can be effectively implemented
- enable meaningful local government input into the proposed 5 yearly review of the Plan.

Representation on the Committee could also be broadened to include some community representation to facilitate implementation of actions and to provide a conduit between the Committee and the region's communities.

GOAL 1 - A GROWING AND DIVERSIFIED AGRICULTURAL SECTOR

▪ **Direction 1.1 – Grow broadacre agriculture and livestock grazing sectors**

- Action 1.1.1 – Implement the Government's Agricultural Industry Action Plan

Comments - This action assumes maintaining the status quo in terms of agricultural activities in the region. While these industries may continue to be the dominant types of agriculture, the possibility of other types of agriculture emerging should be allowed for, eg some large

ATTACHMENT 1

dairies are now locating to the Tablelands area on land that has been traditionally used for grazing. The actions under Directions 1.1 and 1.2 should not be considered and implemented in isolation but should inform each other.

- ***Direction 1.2 – Grow and diversify intensive agriculture and food processing agribusiness***
 - Action 1.2.1 Prepare and implement a Regional Intensive Agribusiness Strategy to support new opportunities for intensive agricultural and food processing agribusiness.

Comments – Council supports Action 1.2.1. The Guyra Tomato Farm is considered a significant opportunity for investigating co-location with other industries that will facilitate employment.

Whilst a relatively small community, Guyra is home to Blush Tomatoes, Australia's leading producer of sustainably grown premium glasshouse tomatoes. With 30 hectares under glass they are currently the largest producer in the southern hemisphere. While it is acknowledged that the draft Plan does identify vegetables and fruit growing in the region as increasing significantly (to be competitive with the poultry and pig industries), it is considered that the Plan should reflect how significant the intensive fruit and vegetable growing industry is and the opportunities to leverage similar and integrated industries to grow the economy into the future. In a climate of global warming the Northern Tablelands stand to be potential winners. It is noted however that a potential constraint for agribusinesses to continue to grow is the lack of a secure water supply which would be addressed through the augmentation of existing supply either in the raising of the existing dam infrastructure or the development of a new pipeline which would provide a very high level of certainty around the supply. Further comment is provided under Goal 4.

Council supports the development of a Regional Intensive Agribusiness Strategy that identifies locations with potential for intensive agricultural development and clusters of complementary activities. Intensive agricultural development covers a large range of activities, with differing requirements. At what stage will intensive agricultural activities appropriate to an area be identified based on infrastructure requirements but also other natural factors such as soils, rainfall and temperature? In order to identify locations with potential for intensive agricultural development, it would be advantageous to know beforehand what type(s) of intensive agriculture would be suitable in different localities now and how the type of agricultural activities in a particular location are likely to change over time, particularly as a result of climate change impacts. The mapping of future suitable intensive agricultural precincts should be undertaken as a priority to ensure that the Regional Plan protects these identified areas accordingly.

In relation to climate change it is noted that the CSIRO and Department of Primary Industries are undertaking research on adapting agricultural production to climate change to cope with changed climatic conditions (page 77 of the draft Plan). Mentioning this project in the Goal 1 section of the Plan would assist in ensuring that the findings are included and implemented as part of the Regional Intensive Agribusiness Strategy.

Direction 1.3 – Protect agricultural land from urban encroachment and fragmentation

- Action 1.3.1 – Identify and protect important agricultural lands

Comments – It would be advantageous if the regional scale mapping that reflects climatic conditions not only provides current climatic conditions but projected climate change impacts (see also comments regarding the proposed Regional Intensive Agribusiness Strategy above).

- Action 1.3.2 – Limit fragmentation of agricultural land and minimize incompatible land uses on or near agricultural land

Comments – The draft Plan does not identify new or innovative ideas to limit fragmentation of agricultural land. Clarification is sought on who is going to do the monitoring of annual changes in landholding size and what actions will be taken if it is found that landholding sizes are decreasing.

▪ ***Direction 1.4 – Increase opportunities to move agricultural produce to market***

Comments – Armidale Regional Airport has in excess of 15,000 aircraft movements per year that includes passenger, charter, scenic/adventure and emergency services flights, both fixed wing and helicopter flights. The Airport offers up to 14 services each day (QantasLink and Rex) between Armidale and Sydney and a further 2 services each day (FlyCorporate) between Armidale and Brisbane. Passenger numbers currently exceed 145,000 per annum and are estimated to continue to increase with improved airport infrastructure and passenger facilities.

The Armidale Regional Airport Master Plan has been completed and is currently being implemented. The Master Plan identifies a new 2,500m runway that will allow for larger aircraft (including jets and cargo planes) to use the airport. Council has identified the desire for the second runway and the opportunities that could arise from this to fly produce/product into SE Asia. Given the 20 year timeframe of the draft Plan, the council's future intentions for Armidale Regional Airport should be recognised in the final Plan.

- Action 1.4.1 – Investigate opportunities to improve local road connections

Comments – Council supports the identification of Waterfall Way and the New England Highway as “primary freight routes” with resources and funding being allocated appropriately. Upgrades to Waterfall Way have the opportunity to increase economic development and tourism for the Armidale Region.

- Action 1.4.3 – Work with the Australian Government on the proposed Melbourne-Brisbane Inland Rail Corridor

Comments – Given the significance and the national scale of the Inland Rail project it is considered that the route corridor should be shown in the final Plan to ensure its protection.

GOAL 2 - A DIVERSIFIED ECONOMY THROUGH THE MANAGEMENT OF MINERAL AND ENERGY RESOURCES, INCLUDING RENEWABLE ENERGY GENERATION

Comments – Council supports the State’s recognition of renewable energy generation opportunities. The draft Plan differentiates between wind and solar power and where it is most likely to be located (wind power on the Tablelands and solar power in the west). However, solar power is also an option for the Tablelands, eg a proposal for a solar farm generating up to 300MW at Metz, east of Armidale. It is recommended that the draft Plan not refer to location (Tablelands vs western areas) in relation to wind and solar power infrastructure as there may be suitable sites and conditions for both types of energy generation across the region.

▪ ***Direction 2.1 – Deliver economic diversity through sustainable use of, and access to mineral and energy resources***

- Action 2.2.2 – Avoid urban and rural residential encroachment into identified mineral and energy resources when preparing long term settlement strategies

Comments – Mineral and energy resources could be identified in the draft Plan in the same way that the Biophysical Strategic Agricultural Land has been mapped.

▪ ***Direction 2.3 – Increase opportunities for renewable energy generation***

- Action 2.3.1 – Map opportunities for renewable energy generation in the region

Comments – The identification and construction of a renewable energy hub in the New England is crucial to the growth and competitiveness of the renewable energy sector. Council seeks greater endorsement and commitment from the State government for this hub to occur. Alternative opportunities for funding the hub need to be investigated.

Ideally the renewable energy precincts should be identified on the Plan so that they can be protected through the strategic planning process. Suitable strategic locations for renewable energies should also be identified.

Community based groups have investigated possibilities for small-scale renewable energy projects (eg wind power) to serve particular localities. It is recommended that the action be amended to include the role that community based groups could play in these smaller scale projects.

GOAL 3 - COMMUNITIES RESILIENT TO CHANGE, WITH HOUSING CHOICE AND SERVICES THAT MEET SHIFTING NEEDS AND LIFESTYLES

Comments – The draft Plan expects that the outward migration of young adults and an increasing ageing population will continue based on past and current trends. However, while it is acknowledged that an ageing population presents economic opportunities, it is hoped that implementing many of the actions in the draft Plan, particularly with its focus on diversifying the regional economy and having prosperous urban centres with job opportunities, would result in some reversal of these trends by attracting and retaining young adults to the region.

ATTACHMENT 1

Extensive community consultation undertaken at the end of 2016 as part of preparing council's *Community Strategic Plan 2017-2027* found that arguably the most talked about issue during the consultation period and high on the list of community priorities were ways of improving the local economy and creating more jobs. The Consultation feedback identified key findings, including *"there is a strong community sentiment that more needs to be done to attract new businesses and industries, in order to create a sustainable economy and employment opportunities"*. As part of addressing this priority, council is currently preparing an *Economic Development Strategy*.

▪ **Direction 3.1 – Strengthen community resilience**

- Action 3.1.1 – Undertake local planning that supports community resilience

Comment – The action to attract and retain younger people is strongly supported. However, the draft Plan would benefit by providing more emphasis and information on the need to do this and how it may occur and identify other actions that would support this desired outcome. The Horticultural pursuits around Guyra through glasshouse innovation should be identified and supported to provide employment opportunities for younger people.

▪ **Direction 3.4 – Promote sustainable settlement growth with great places to live**

- Action 3.4.2 – Promote quality urban design in neighbourhoods and centres

Comment – the Action includes encouraging councils to apply the Neighbourhood Planning Principles in the draft Plan when preparing their local environmental plans and development control plans for new release areas and in strategic planning to revitalize town centres.

Unlike complying development, which specifies criteria that must be complied with, the nature of controls in development control plans (DCPs) are non-mandatory with DCPs only able to provide guidance (section 74BA of the Environmental Planning and Assessment Act 1979). Consequently, including relevant provisions in DCPs does not ensure that the above actions and outcomes will necessarily be achieved. If effective implementation of the Plan is dependent on them being achieved, then a mechanism other than DCPs that provides more certainty should be identified in the Plan. Note: the same concern about effective implementation of actions also applies to Direction 3.3 *Deliver housing choice to suit changing needs* which suggests that councils adopt Liveable Housing Australia's *Liveable Housing Design Guidelines* in development controls.

A considerable proportion of new housing is now complying development under the SEPP (Exempt and Complying Development Codes) 2008. An evaluation of neighbourhoods where the predominant type of housing is complying development could be carried out to ascertain if the resulting built environment meets the Neighbourhood Planning Principles in the draft Plan and whether the Codes SEPP should be reviewed. If such an evaluation were to be considered worthwhile it would be preferable to carry it out prior to any introduction of medium density housing as complying development in the Codes SEPP.

- Action 3.4.3 – Encourage healthy living by increasing options for walking and cycling

Comment – It is recommended that the Action be amended by adding "participating in sporting activities" and the draft Plan refer to the maintenance and development of sporting

ATTACHMENT 1

infrastructure and facilities in order to encourage a healthy lifestyle through participation in sporting activities and to encourage the allocation of major sporting events to the region.

Healthy living also includes opportunities to participate in cultural activities. While the draft Plan acknowledges and plans for recreational activities it should also recognize and plan for the significant role that cultural activities have in community well-being. Options include providing community facilities that serve the needs of schools and the community (refer to further comments under Action 3.5.2 below).

▪ ***Direction 3.5 – Increase access to health and education services***

- Action 3.5.2 – Facilitate planning for additional primary and secondary school places

Comment – Clustering or co-location of community and school assets provides an opportunity for providing cultural facilities, eg performance spaces, in response to greater community expectations for such facilities and the growing number of school courses and students in the performing arts area.

▪ ***Direction 3.6 – Coordinate infrastructure delivery***

- Action 3.6.1 – Coordinate urban growth and infrastructure delivery

Comments – Studies show bulk water supply (dams) for Guyra is too small to provide secure, reliable water supply for current and future needs. Council is investigating options to improve drought security for Guyra.

Council is licensed to supply town water supplies rather than agriculture, which is usually the responsibility of Department of Primary Industries (Water). In relation to growing and diversifying intensive agriculture and food processing agribusiness under current licensing arrangements, council's town water supplies could potentially be available for food processing businesses but could not be allocated to agriculture. Projected water supply requirements for future intensive agriculture and potential water sources need to be investigated by the Department of Primary Industries (Water), in consultation with council.

General comment - social wellbeing

One of the key principles underpinning the draft Plan is to facilitate social wellbeing. While the draft Plan identifies and addresses issues such as growing the economy, providing health and education facilities, housing affordability and providing recreational spaces, other issues which facilitate social wellbeing should be included or given greater consideration. These issues include retaining youth, providing cultural facilities, and other matters relating to housing affordability, such as homelessness.

GOAL 4 - PROSPEROUS URBAN CENTRES WITH JOB OPPORTUNITIES

▪ **Direction 4.1 – Grow the regional cities of Tamworth and Armidale**

- Action 4.1.1 – Work with Tamworth and Armidale Regional Councils to provide opportunities for increased jobs, services and housing

Comment – Recognition of Armidale as a regional city along with Tamworth is strongly supported and is consistent with council's intention to take a leading role in providing a sustainable prosperous future for its community and the region.

It is considered desirable that there be some differentiation between Armidale and Tamworth in terms of the services provided, community aspirations and cultures, to encourage a complementary rather than competitive approach to growth in the region.

The draft Plan acknowledges Armidale as having a high concentration of people employed in education and training in the region. It is considered that the existing emphasis on education and training for the Armidale region is a point of difference between Armidale and Tamworth. With Armidale having NBN infrastructure in place it should be recognised in the Plan as the leading regional education and training hub for the New England North West.

Figure 14 of the draft Plan identifies Armidale's growth precincts including "future residential investigation areas" and "future large lot residential investigation areas". The future large lot residential investigation area includes land identified in previous studies (eg *Armidale Dumaresq Rural Residential Study*, EDGE Land Planning, 2005) for future rural residential purposes as well as an additional area south of Bundarra Road. It is recommended that most of the additional area south of Bundarra Road, generally from the New England Highway west to Micklegate Road, not be included in the future investigation area for the following reasons:

- The land is in proximity to Armidale Regional Airport, which has been identified for future upgrading, including the possibility of introducing flights to freight fresh produce following construction of a second runway. Rural residential development in the vicinity of the airport may compromise future airport operations.
- The Armidale Regional Airport Masterplan includes future development of a residential estate adjoining the airfield that includes parking and connecting taxiways for private planes. Permitting this type of a development could be a specific amendment to council's local environmental plan rather than allowing large lot residential development generally over a larger area south of Bundarra Road.
- Removing the land from the future large lot residential investigation area will reduce the potential for ribbon development along Bundarra Road.
- Land south of Bundarra Road has been identified as Biophysical Strategic Agricultural Land (Figure 7) in the draft Plan that could be used for intensive types of agriculture.
- Alternative areas for large lot residential development should be investigated prior to adding land south of Bundarra Road to the future large lot residential investigation area. For example, land south west of Armidale already has fragmented ownership, limited biophysical strategic agricultural land and less native tree cover.

ATTACHMENT 1

Note: Council supports the inclusion of a small pocket of land south of Bundarra Road, west of Micklegate Road to Saumarez Ponds as “future large lot residential investigation area”.

▪ ***Direction 4.2 – Enhance access to jobs, goods and services by improving connections between centres***

Comments – Currently fresh produce from the Armidale region is trucked to Brisbane where it is flown out to international markets. Flying fresh produce from the Armidale region to Toowoomba, Brisbane or directly to Asian markets would be dependent on increasing demand for this service as well as the new runway proposed in council’s Armidale Regional Airport Master Plan. Opportunities for increasing demand are likely to arise if fresh produce grown in glass houses expands on the Northern Tablelands.

○ Action 4.2.2 – Deliver improved transport connectivity for urban centres

Comments – It is recommended that the Action be amended by adding “improvement and maintenance of existing passenger and freight railway infrastructure and service”, including the passenger rail service between Armidale and Sydney. It is also recommended that the existing rail corridor be retained to the north of Armidale and that consideration be given to linking various transport options to assist commuters with multiple-leg journeys.

Improving bus connections within regional communities is supported. As Armidale grows, smaller towns and villages within commuting distance are also likely to grow as they will provide lifestyle opportunities and potentially more affordable housing choices. The towns and villages of Guyra, Black Mountain, Wollomombi, Hillgrove, Uralla, Invergowrie and Kentucky (the latter three being within Uralla Shire) are located within a 40 kilometre radius of Armidale. In 2011 of the 10,216 people who worked in the former Armidale Dumaresq council area, 11.3% lived in Uralla Shire. There is already a trend for people to live outside but work within Armidale and public transport connections are necessary, particularly as this trend is likely to increase.

▪ ***Direction 4.3 – Provide well-located and serviced supplies of industrial and employment lands***

Comments – Figure 15 of the draft Plan shows the availability of industrial land by local government area in 2012-13. For Armidale Regional Council, it is likely that overall there is sufficient land available for industrial development the local government area. The area of developed industrial land is less than the area of vacant industrial land. The latter does not include a proposed industrial zoning of approximately 53 hectares on the New England Highway, opposite Armidale Regional Airport, which was identified as future industrial land in the *Armidale Industrial Land Study* (AECGroup, 2013). Council is also proposing to prepare a study that includes identifying the demand, supply and appropriate locations for commercial and industrial land in Guyra over the next 20 years.

▪ ***Direction 4.5 – Grow tourism to support employment opportunities and urban centre***

○ Action 4.5.1 – Facilitate opportunities for a range of tourism experiences and accommodation

Comments - In terms of supporting and building tourist destinations, upgrading of Waterfall Way to reduce travel time between Armidale and the mid-North Coast city of Coffs Harbour and coastal towns and villages would assist in attracting tourists to Armidale and surrounds as well as making Armidale a lifestyle choice with beaches only a relatively short travelling time away.

GOAL 5 – PROTECTED WATER, ENVIRONMENT AND HERITAGE

▪ **Direction 5.2 – Protect areas of high environmental value**

Comments – The criteria for identifying the areas of potential high environmental values in Figure 17 of the draft Plan should be provided.

The draft Plan should include actions to guide councils in their decision making regarding local planning strategies and LEPs that apply to areas of ‘potential high environmental values’, eg how much weight should council’s give to protecting these areas given that at this time they are ‘potential’ not ‘actual’ areas of significance; should such strategies or LEPs prohibit any intensification of development on these lands; how will landholders be affected by identifying the potential areas in terms of what they may do with their land?

Figure 17 indicates that a substantial area of the Armidale Regional local government area is identified as ‘potential high environmental values’. The resources required to ascertain whether an area of potential high environmental value actually has value or not is usually beyond those of council to provide.

Biodiversity certification for the region is considered the best solution for not only local governments, but the community and the development industry and should be undertaken as a priority. Biodiversity certification offers planning authorities a streamlined biodiversity assessment process for areas marked for development at the strategic planning stage. The process identifies areas of high conservation value at a landscape scale. These areas can be avoided and protected while identifying areas suitable for development. Furthermore, biodiversity certification offers a range of secure options for offsetting impacts on biodiversity. The biodiversity certification process could be led by the local governments within the region but requires substantial financial commitment from other agencies.

○ Action 5.2.1 – Protect areas of high environmental value

Comments – The draft Plan would benefit from further clarification in implementing this Action. With regard to the continually refining mapping relating to potential high environmental value areas, where will the new information come from – Office of Environment and Heritage, council (DAs, Planning Proposals) - and how long will it take to provide updated mapping? Who will be responsible for deciding if land has potential value or not? Does refining the mapping mean that potential areas are identified as having high values or not, and if the latter, will the areas be removed from the potential high

environmental values mapping? Or does refining mean that further areas will be added to the potential high environmental values map?

▪ ***Direction 5.4 – Adapt to natural hazards and climate change***

Comments - Actions 5.4.1 to 5.4.3 in the draft Plan seek to address climate change impacts, including assisting communities to adapt to climate change, undertaking climate change mitigation initiatives and addressing the potential impacts of flooding as a result of climate change. Climate change is also likely to impact on biodiversity across the region and the Plan should recommend actions for addressing this significant issue.

A likely impact of climate change is the occurrence and frequency of bushfires. While council has factored in climate change as part of their recent flood studies, the current NSW Rural Fire Service guidelines for preparing bushfire prone land mapping does not include climate change impacts. It is recommended that the Plan include an action that involves reviewing the mapping guidelines and other relevant documents to factor in the likely impact of climate change on the location of bushfire prone land.

- Action 5.4.1 – Assist the community to adapt and build resilience to climate change

Comments - The draft Plan proposes to implement the above Action in part by ‘completing the New England North West Enabling Regional Adaptation Project and assisting communities to implement resilience outcomes’.

Regional workshops were held during 2016 as part of the New England North West Enabling Regional Adaptation (NENWERA) Project. Significant matters and key systems for the region were identified, many of which are also identified in the draft Plan, for example renewable energy, intensive agriculture, human services and youth retention. However, there are some inconsistencies between the NENWERA Project and the draft Plan, eg Tamworth as the regional centre for the NENW, and these should be identified and resolved prior to finalisation of the Plan and the NENWERA Project.