Submission to the Department of Planning  
Draft Far North Coast Regional Strategy  
May 2006

The Planning Institute of Australia (PIA) is the peak professional body representing professions involved in planning Australia’s cities, towns, regions and places. PIA is a not-for-profit association delivering benefits to over 4,500 members nationally. Our members are drawn from a range of planning professions – urban and regional planning, social planning, urban design, environmental planning, economic development planning, transport planning and planning law. A large proportion of our membership is employed in local government.

The following submission is lodged on behalf of the NSW Division of the PIA and provides a collaborative response to the Draft Strategy, based on input from PIA NSW members, in particular members of the PIA NSW Northern NSW Branch.

General

The Department of Planning is commended on the considerable work undertaken to produce the Draft Far North Coast Regional Strategy.

However, in light of recent regional strategies released by the NSW Government, PIA NSW is concerned that there is no consistent approach to regional planning in NSW. The fundamental approach to regional planning in the Draft Far North Coast Regional Strategy, which appears to be based on growth management using urban containment boundaries, is inconsistent with that used in the Draft South Coast Regional Strategy, for example, which appears to be based on environmental sensitivity.

Whilst it is acknowledged that each region of NSW is unique, with their own regional identities, and distinct environmental, community and landscape characteristics, there should be some degree of consistency in the approach to the planning of these regions.

PIA NSW is also concerned that most of the elements of the draft Strategy do not provide adequate strategic direction for economic growth/re-direction and do not give a basis for how the key challenge of economic change in the region is to be handled, along with the challenge of an aging population.

Furthermore, given that LEPs prepared in accordance with the Strategy are meant to be reasonably spatially specific, the generalities of the "strategies" do not give adequate guidance for developing local spatial strategies that can inform a good set of planning controls.
Supported Elements of the Draft Strategy

The Draft Strategy contains several key elements that are considered to be positive outcomes. The key positive elements of the Strategy from PIA's perspective are outlined below.

A Region of Villages
This concept of maintaining the region as being characterised by villages is supported, as is the objective to house the majority of the growing population in major regional centres and Major Towns with an emphasis away from the Coastal Area.

Lismore and Tweed Heads as Major Regional Centres
Recognition of these centres and the need to support them with adequate infrastructure is appropriate.

Ballina as a Planned Major Regional Centre
The identification of Ballina as a planned major regional centre is consistent with the overarching approach by Ballina Shire Council in recent times towards enhanced tourism, attraction of improved and higher order health services, the upgrading of the airport, improved road infrastructure, sewage treatment plant upgrades and population increase via existing identified urban release areas.

Byron Bay
Identifying Byron Bay as a town with a strong tourism focus but limited opportunities for significant urban growth is supported.

Rural Residential Development
Prohibition of rural residential development outside an endorsed strategy is an approach which is consistent with the current planning policy in the North Coast REP and is supported. The concept of not supporting further rezonings for rural residential development in the Coastal Area (other than in approved strategies) is also supported.

Regional Transport
The concept of protecting the Casino to Murwillumbah rail corridor and investigating the Gold Coast rail extension is supported. Improved links from the Summerland Way to SE Queensland and continued upgrading of the Pacific Highway are also supported.

Concerns with the Draft Strategy

The draft Strategy appears to provide very limited new direction beyond the concepts and policies embedded in existing Council documents and the current statutory planning framework applying in the region. It is not innovative and does not strengthen approaches to long term planning challenges in the area such as public transport, human services and biodiversity conservation. The draft strategy is a missed opportunity to elevate and build on the contribution of the North Coast REP to directing the growth of the Far North Coast of NSW.

The strength and robustness of the document is of concern, particularly given that it includes very little detail with respect to infrastructure provision which is a core underpinning factor in providing functional settlement expansion in the region. There is a total lack of integration between land use and infrastructure planning. Without careful and considered infrastructure planning linked closely to settlement patterns, the ability of local and State Government to deliver enhanced and improved planning outcomes is likely to be impeded.

In addition to the general matters addressed above, there are a number of more specific matters that are also of concern, which are outlined below.
Infrastructure

Regional Infrastructure
The content of the draft Strategy is limited with respect to the provision of key regional infrastructure. A Regional Strategy should clearly articulate the type and general location for key infrastructure and unambiguously identify the mechanisms for its provision and funding and associated responsibilities for State and local government. The Far North Coast Strategy presents an opportunity to establish a more defined direction for the provision of key infrastructure, which would in turn contribute to improved local planning outcomes.

Regional transport planning has been identified as a key priority by the region’s communities (e.g. Regional Economic Development Board through their Regional Industry and Economic Plan). The section on Transport does not identify any future road hierarchy plans, ignores the possibility of alternative heavy vehicle routing and fails to address the relationship with the SEQ hinterland, by focusing on Coolangatta and Gold Coast with limited attention to the possibility of a link of the Summerland Way into Beaudesert. These factors need to be addressed to integrate land use and transport planning.

Public transport infrastructure is scarcely referred to in the draft strategy. The Strategy position on the future use of the Casino to Murwillumbah rail corridor and investigating the Gold Coast rail extension should be stronger.

Development Contributions
The relationship between local contribution collections and allocation, and the collection and use of State levied contributions is unclear. The Department must clarify the proposed mechanism for State levied contributions, the means for provision of regional infrastructure, the source of funding for regional infrastructure (e.g. will contributions collected within the Far North Coast be solely used for infrastructure in the Far North Coast Region?) and the process for funding of backlog works. Further clarity with respect to these matters will assist local government in planning and budgeting for necessary facilities.

Social Infrastructure
The draft Strategy does not provide sufficient direction with respect to social infrastructure such as health services, welfare services, affordable housing, aged care facilities, community facilities, and regional open space. Such infrastructure is crucial to the long term functionality and viability of the settlements on the Far North Coast. It is strongly suggested that the Strategy specifically addresses social infrastructure and establishes a regional direction for the provision of such services and facilities. The draft strategy does not address the need for a new hospital facility in the Ballina / Byron area, a key regional social infrastructure issue. The Strategy provides an ideal opportunity to provide direction or even resolve this key regional issue. The Strategy should also establish a regional approach to affordable housing.

Plans and Documents Required Under the Strategy
The draft Strategy references at least ten separate plans, strategies or other documents in relation to the achievement of Strategy outcomes. Many of the documents identified have not yet been prepared at a local or regional level. Further, many of the requirements for new plan or strategy preparation are identified as being the responsibility of local government. However, it is unclear in many instances as to the precise mechanisms for when the referenced documents would need to be prepared and what content the document should contain. Local Government is concerned about the associated resource implications and this needs to be clarified in Section 12 – Implementation of the Strategy. For example, formal clarification is required with respect to the Growth Management Strategy and how such a Strategy would be linked to existing Urban Land Release Strategies and the preparation of new LEPs.

Further to the above concerns it is noted that several key documents that are referred to as being the responsibility of State agencies to prepare seem highly significant in the context of both achieving

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Strategy outcomes and in the preparation of new Shire wide LEPs. A clear timetable for the delivery of the identified plans and strategies must be provided so as to assist councils in programming the preparation of the new LEPs.

**Sustainability Criteria**

The Sustainability Criteria set out in the draft Strategy, as a means to determine whether additional urban areas may be suitable outside the Coastal Area, are sufficiently vague and generic that they are virtually unusable both for proponents and Councils. The criteria must be enhanced and strengthened so as to provide stronger requirements and more rigorous direction with respect to potential development outside defined areas under the Strategy. In particular, the criteria would be improved by more strongly supporting environmental and agricultural protection, location of development away from environmental hazards, provision of key services and infrastructure, and integration with local and regional infrastructure networks.

The Sustainability Criteria should also clearly refer to a requirement for proposals to conform to other land use policy defined by councils and the State.

**Mapping**

The level of mapping may generate confusion and unreasonable expectations with respect to urban footprint areas, areas subject to environmental hazards, environmentally significant lands and agricultural lands, especially where attributes are close to urban areas.

Many of the areas identified for urban development are subject to significant constraints. Therefore, to ensure clarity for Strategy users, the level of mapping must be more thoroughly explained to highlight its purpose. Further, it is important that explanations relating to the mapping more clearly indicate that the development of urban areas are subject to detailed site assessment and that the identification of new release areas does not mean that the entire marked area is suitable for urban development.

**Buffering**

The establishment of buffers to separate urban areas is a positive approach advanced by the draft Strategy, however the approach to the issue is ambiguous. For example, text in the draft Strategy refers to the provision of buffers, but the Town and Village Growth Boundary Maps do not include a reference to this requirement. This approach makes the provision of buffers unclear and may promote false expectations for land owners.

The intent to achieve discrete and defined urban settlements must be further clarified in the draft Strategy, particularly with respect to the Boundary Maps which will likely be the key component of the Strategy referred to by land developers. Given this, it is suggested that the Strategy (and particularly the Town and Village Growth Boundary maps) clearly indicate that potential release areas are subject to a range of more detailed investigations and planning incorporating elements such as urban buffers and other planning principles advocated by the Strategy.

**Clarification of New Release Potential**

Related to the above points regarding mapping and buffering, it is suggested that the Strategy makes it abundantly clear that an area identified for future urban use does not mean that the area, either in part or in its entirety is suitable for urban development. The Strategy should clearly indicate that such land is subject to detailed assessment. It is important that land owners are not given unreasonable expectations with regard to land development potential by the Strategy.
The current text indicating that not all land is suitable for development is not prominent enough and does not provide sufficient clarity with respect to the required assessment of the capability and suitability of such land for development. This could be improved by clearly stating the requirement for additional investigations and making text related to this larger on the relevant mapping.

Clarification of Employment Lands Potential

The draft Strategy does not appear to indicate that areas identified as Employment Lands area not necessarily developable and would be subject to further detailed assessment similar to residential release areas. As with residential release areas, it is essential that requirements for further assessment and provision of necessary infrastructure, buffering, environmental protection and the like are clearly set out by the Strategy.

Heritage, Tourism and Recreation, Health and Education

The matters of heritage, tourism and recreation, health and education are addressed in the North Coast Regional Environmental Plan. The draft Strategy does not address these matters as strongly as the mechanisms provided under the REP. These matters are addressed in a meaningful, practical and robust manner for the region as they are key issues for the Far North Coast community, therefore the Department must consider this when determining the statutory planning framework that it applies to the region. In particular there is no attempt to link the draft strategy to the regional economic work recently carried out by the Regional Economic Development Board in conjunction with local Councils and business.

Definition of the Coastal Area

Reliance on the presence and location of the Pacific Highway as a key “boundary” for the definition of the Coastal Area is of concern. Linking of the Pacific Highway alignment, which will change over the Strategy period, to what is defined as the Coastal Area does not provide for a consistent approach to planning on the coast. The use of the highway alignment to separate the Coast from inland areas does not recognise key physical features that define coastal areas. For example, in Ballina Shire, part of the Newrybar escarpment in the northern part of the Shire is protected by the requirements applying to the coastal area under the draft Strategy, whereas the Blackwall Range in the south is located west of the highway and as such is not subject to the same principles even though the two escarpments are very similar in terms of their prominence and relationship to the coastline.

The coastal zone should be defined utilising physical land characteristics consistent with the NSW Coastal Policy and other established coastal planning approaches.

Climate Change

The concept of climate change has received very limited attention in the draft Strategy. The issue is significant to planning on the Far North Coast, particularly in the coastal corridor. The State Government’s position regarding climate change, as it relates to planning, must be more clearly set out in the Strategy, particularly given the 25 year life span of the document.

Lot Release

The draft Strategy places significant emphasis on dwelling and population targets. However, as the Department will be aware, councils do not control the release of land once approved. The Department must provide further advice as to the mechanisms it proposes to use to assist councils in meeting dwelling and population targets.
Service Industry – Economic Profile

The economic profile summary in Section 2 of the draft Strategy could be enhanced by more clearly illustrating that the service industry sector comprises approximately 85% of the regional economy. At present, the summary suggests that manufacturing, construction and agriculture are of similar significance. Although important, these sectors do not have the same influence as the service sector. A clearer indication of the significance of the service sector would provide a more realistic basis to inform housing and industry decisions.

Farmland

It is unclear as to how the Far North Coast Regional Strategy relates to the Farmland Protection Project and associated S117 Direction No. 14 (Farmland of State and Regional Significance on the NSW Far North Coast) regarding agricultural lands. Clarification is required as to whether the Strategy is intended to replace the S117 Direction or whether the Strategy and S117 Direction will function concurrently. It is important that the intent of the Strategy with respect to agricultural land is clear as it is a key issue on the Far North Coast that will be prevalent during the LEP reviews to be undertaken by Councils.

Community Infrastructure and Open Space

The establishment of defined footprints for urban areas provides a clear direction with respect to urban growth. However, such boundaries will limit the ability to provide for a complete range of community infrastructure and facilities. Therefore the requirement for community facilities and especially open space to be located within defined urban footprints should be removed from the Strategy (or modified) so that such infrastructure such as playing fields can be located outside the footprint, where appropriate to do so, for the benefit of local communities.

Concept of Diverting Growth Inland

The draft strategy purports to encourage growth in the inland towns and villages by restricting growth in environmentally sensitive coastal areas east of the Pacific Highway. According to the strategy, Lismore will accommodate an additional 8000 new dwellings over the next 25 years. This represents more than 15% of the total anticipated growth for the Far North Coast Region.

The 1540ha of proposed land release in the Ballina area is more than five times that of the Lismore urban area (276ha), although the 2031 new dwelling target for Ballina Shire is just 400 more than that for Lismore. It is apparent that the area of land identified in Ballina-Lennox Head area will accommodate much more than the projected 8400 new dwellings identified in the strategy. It is also apparent that, with the amount of land available in the Ballina area, the bulk of the targeted growth in this part of the region in the next 25 years will occur in Ballina. It is therefore very unlikely that the projected 15% displacement of growth from coastal to inland areas will occur, or that Lismore and the other inland areas will achieve their nominated population and housing targets without addressing transport, social and other infrastructure planning. The draft strategy will fail to fulfil its dual objectives of restricting development on the coast and encouraging growth in the major inland towns without this integrated planning approach.