17 March 2017

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

Dear Sir / Madam,

Planning Institute Australia – Submission on Draft New England/North West Regional Plan

The Planning Institute of Australia (PIA) is pleased to make this submission on the Draft New England/North West Regional Plan (NENWRP). This submission has been prepared by Members of the Northern Branch of, and endorsed by the Convenor of the Policy Committee of, the Planning Institute of Australia NSW Division (PIA NSW).

The Planning Institute of Australia (PIA) is the peak body representing professionals involved in planning Australian cities, towns and regions. The Institute has around 5000 members nationally and around 1200 members in New South Wales. PIA NSW plays key roles in promoting and supporting the planning profession within NSW and advocating at all levels in relation to key planning and public policy issues.

PIA supports the development of the NENWRP and its strategic policy direction for housing and industry across the New England/North West (NENW). The successful implementation of the plan will provide benefits to the community in respect of housing, jobs, environment, resources, community services and infrastructure provision.

PIA considers that there are a number of areas where the plan can be strengthened. We remain confident that the Department of Planning and Environment (DPE) can capitalise on these opportunities for improvement and deliver a strong and robust regional plan that will effectively chart the course for the NENW Region over the next 20 years. We have identified a number of key areas that we believe would benefit from further refinement by DPE.

**VISION**

The Vision Statement reads more as a snapshot of the present, rather than an image of what the region might look like in 30 years’ time. We cannot assume that if things are going well now, they always will. “More of the same” will not work if circumstances change. The Vision appears to be an attempt to preserve the status quo.

**GOVERNANCE**

PIA considers that identifying an appropriate governance structure is a key issue for the NENW and supports the inclusion of the ‘Delivering the Plan’ section and the proposal for establishing a New England/North West Regional Plan Co-Ordination and Monitoring Committee. The NENW needs to be part of a shared vision with government servicing bodies if it is going to be more than just a guideline for land use planners. There is the crucial need, as with many regional plans, to ensure tangible connection between Plan actions and the accountability for implementation.

**GOAL 1 – A growing and diversified agricultural sector.**

The NENWRP appears to acknowledge that this goal has already been achieved. The underlying theme appears to be that planners should step back and just allow this to continue. However, this
approach is not sustainable in the face of major changes such as global warming and volatile export markets.

**ACTION 1.1.1 – IMPLEMENT THE GOVERNMENT’S AGRICULTURE INDUSTRY ACTION PLAN.**

Once again, this is a snapshot of work already under way by the DPI.

**ACTION 1.2.1 – PREPARE AND IMPLEMENT A REGIONAL INTENSIVE AGRIBUSINESS STRATEGY TO SUPPORT NEW OPPORTUNITIES FOR INTENSIVE AGRICULTURAL AND FOOD PROCESSING AGRIBUSINESS.**

This is an important initiative. Finding and protecting suitable sites (from the encroachment of conflicting land uses) for these businesses is difficult. Mapping is required, followed by public consultation to avoid conflict at the development stage.

Linking of these businesses to their inputs and markets is also crucial. A timeline for the Strategy would also be helpful.

**ACTION 1.3.1 – IDENTIFY AND PROTECT IMPORTANT AGRICULTURAL LANDS.**

As noted above, this is important for intensive as well as extensive agriculture. It is not clear, however, who will carry out this Action and how.

**ACTION 1.3.2 – LIMIT FRAGMENTATION OF AGRICULTURAL LAND AND MINIMISE INCOMPATIBLE LAND USES ON OR NEAR AGRICULTURAL LAND.**

This is already happening through SEPP (Rural Lands) 2008 and new LEPs. What has been missing to date is a rigorous approach to determining minimum productive land holding sizes for likely agricultural uses. That should be provided through the DPI.

**ACTION 1.3.3 – INCREASE THE REGION’S BIOSECURITY THROUGH THE USE OF BUFFERS AND LAND USE CONFLICT RISK ASSESSMENT.**

Buffers are useful for biosecurity and reducing land use conflict, but historically buffer design has been weak. Similarly to Action 1.3.2, more scientific rigor is required to determine adequate buffer width and location.

**ACTION 1.3.4 – MANAGE AND PROTECT TRAVELLING STOCK RESERVES FOR THEIR ECONOMIC, ENVIRONMENTAL AND SOCIAL VALUES.**

A solid link is required between the work LLS is carrying out and strategic planning by councils. Otherwise one could easily negate the other.

**ACTION 1.4.1 – INVESTIGATE OPPORTUNITIES TO IMPROVE LOCAL ROAD CONNECTIONS.**

This should be standard practice by the RMS, if transport planning is integrated with land use planning.

**ACTION 1.4.2 – INVESTIGATE OPPORTUNITIES FOR INCREASED RAIL FREIGHT.**

This is a popular idea – every LGA seems to want a rail/road interchange. But is there any serious commitment to it by the Government? Potential hubs have been identified, but feasibility needs to be investigated and priority sites named.

**ACTION 1.4.4 – INVESTIGATE OPPORTUNITIES TO PROVIDE GREATER ACCESS FOR HIGH PRODUCTIVITY VEHICLES.**

This obviously requires the involvement of the RMS, but they are not mentioned. Again, transport and land-use planning need to be integrated.
GOAL 2 – A diversified economy through the management of mineral and energy resources, including renewable energy generation.

There is good recognition here of the balances required between renewable vs non-renewable energy production and mineral or gas extraction vs agriculture and environment.

**ACTION 2.1.1 – IDENTIFY MINERAL AND ENERGY RESOURCE LANDS TO SUPPORT SUSTAINABLE DEVELOPMENT OF MINING INDUSTRIES.**

A strong link between resource identification and local strategic planning needs to be made. Identification in LEPs and other local planning documents should be considered.

**ACTION 2.2.1 – PLAN FOR THE ONGOING PRODUCTIVE USE OF EXTRACTIVE RESOURCE LANDS.**

Planning at the local and regional level for these land uses needs to be allowed. Currently most large developments of this type are managed at the State level. In particular, the provision of housing to cater for these developments requires long-term planning and local authorities need to be involved early.

**ACTION 2.2.2 – AVOID URBAN AND RURAL RESIDENTIAL ENCROACHMENT INTO IDENTIFIED MINERAL AND ENERGY RESOURCES WHEN PREPARING LONG-TERM SETTLEMENT STRATEGIES.**

This is supported. See comments on Actions 2.1.1 and 2.2.1.

**ACTION 2.2.3 – IMPLEMENT A ROBUST ASSESSMENT PROCESS TO CONSIDER SOCIAL, ECONOMIC AND ENVIRONMENTAL IMPLICATIONS AND MANAGE THESE THROUGHOUT THE LIFE OF THE PROJECT.**

This should already be a part of the E.I.S. process.

**ACTION 2.3.1 – MAP OPPORTUNITIES FOR RENEWABLE ENERGY GENERATION IN THE REGION.**

It is understood that some mapping has already been prepared, but detailed and extensive mapping is crucial. This will aid industry planning and increase transparency for the community.

GOAL 3 – Communities resilient to change, with housing choice and services that meet shifting needs and lifestyles.

It is important that local strategic planning responds to the ageing of the community and restructuring in agricultural/mining industries.

**ACTION 3.1.1 – UNDERTAKE LOCAL PLANNING THAT SUPPORTS COMMUNITY RESILIENCE.**

Often low-cost housing is linked to limited employment opportunities. It is important that local communities are not dominated by low-skilled or welfare-dependent households as a result of promotion of housing affordability.

Responses to the housing demands of rapidly rising and falling mining industries in affected communities are important. It is generally accepted that isolated mining camps and rental stress are undesirable but inevitable without suitable planning.

Residential care which enables people to age in their own communities is important. Being required to move to larger centres to find appropriate care is stressful for the aged and their families.

Meaningful engagement of the community in strategic planning is critically important to give them ownership and responsibility of the outcomes.
ACTION 3.1.2 – WORK WITH LOCAL ABORIGINAL LAND COUNCILS TO CONDUCT A STRATEGIC ASSESSMENT OF THEIR LANDHOLDINGS TO IDENTIFY PRIORITY SITES FOR FURTHER INVESTIGATION OF THEIR ECONOMIC OR HOUSING OPPORTUNITIES.

Aboriginal economic initiatives are rare. Real action is required. Industry involvement at the planning and development stages would assist in producing sustainable economic outcomes.

ACTION 3.1.3 – FACILITATE THE DELIVERY OF TEMPORARY HOUSING FOR MINING AND SEASONAL OR ITINERANT AGRICULTURE EMPLOYEES.

This was alluded to in our response to Action 3.1.1. The planning guidelines for temporary accommodation should be prepared as a priority. Facilitating the social and economic integration of this development is crucial. Alternatives to isolated developments also need to be considered.

ACTION 3.2.1 – FACILITATE THE SUPPLY OF MORE AFFORDABLE HOUSING.

This is mainly an issue for Tamworth and Armidale, where employment is strong, and in mining-affected communities. This type of housing needs to be in close proximity to jobs and services and socially integrated.

ACTION 3.3.1 – PROVIDE FOR A RANGE OF DWELLING TYPES IN LOCAL CONTROLS.

Quality, well-designed medium density housing close to services is rare in this region. Most medium density housing consists of dual-occupancies in suburban areas. Some such development could also occur in or adjacent to CBDs, which are generally empty of residents but, in Tamworth and Armidale at least, have the most services and entertainment.

ACTION 3.4.1 – DIRECT FUTURE GROWTH TO THE MOST APPROPRIATE LOCATIONS BY APPLYING DRAFT SETTLEMENT PLANNING PRINCIPLES.

This is a common-sense proposal and should already be in place for all new LEPs.

ACTION 3.4.2 – PROMOTE QUALITY URBAN DESIGN IN NEIGHBOURHOODS AND CENTRES.

This action does not go far enough to promote good urban design, which is almost completely lacking in the NENW. The NENWRP should promote industry standards such as the Landcom Guidelines for street, housing, open space and landscape design.

ACTION 3.4.3 – ENCOURAGE HEALTHY LIVING BY INCREASING OPTIONS FOR WALKING AND CYCLING.

Anecdotal evidence suggests that people in the NENW are less likely to walk or cycle to a destination, because it is so easy to drive and so difficult or dangerous to walk/cycle. This is despite the fact that there are strong cycling clubs throughout the region. Most people will walk or cycle for fitness, but drive to get somewhere. More focus is required on urban design to improve safety and street connectivity/legibility, as well as cycleway/footpath networks, and remove obstacles to cyclists/pedestrians such as roundabouts and cul-de-sacs.

ACTION 3.5.1 – REALIGN HEALTH SERVICES TO THE NEEDS OF THE COMMUNITY.

It is unclear exactly what is being proposed here.

GOAL 4 – Prosperous urban centres with job opportunities.

Urban centres are critical generators of economic output and employment in the region. Growth should be facilitated as a priority.

ACTION 4.1.1 – WORK WITH TAMWORTH AND ARMedALE REGIONAL COUNCILS TO PROVIDE OPPORTUNITIES FOR INCREASED JOBS, SERVICES AND HOUSING.
It is particularly important that commercial, industrial and services growth are promoted, as well as residential. Constraints and opportunities should be identified through regular development strategy updates. Tamworth’s most recent strategy is now 12 years old.

**ACTION 4.2.1 – IDENTIFY CONNECTIVITY IMPROVEMENTS FOR KEY STATE ROADS IN THE REGION.**

Transparency for the community in this planning process could be improved. Most local projects only come to public attention when a politician makes an announcement, or when work actually starts.

**ACTION 4.2.2 – DELIVER IMPROVED TRANSPORT CONNECTIVITY FOR URBAN CENTRES.**

Public transport, other than school buses and taxis, is practically non-existent in the NENW. New approaches, such as commercial car-sharing, need to be promoted.

**ACTION 4.2.3 – MINIMISE THE IMPACT OF DEVELOPMENT ON THE EFFICIENCY OF THE TRANSPORT NETWORK.**

Highways through towns also usually form part of their CBDs and have the dual functions of access to local services as well as transit. The vibrancy of CBD strip-shopping, which often forms the heart of a town, should not have to take second place to a road’s transit function. Main street/highways are a critical opportunity to attract passing trade where development is allowed along these roads. By-passes, on the other hand, should obviously be granted a primary transit function.

**ACTION 4.3.1 – SECURE A SUPPLY OF RELEVANT INDUSTRIAL AND EMPLOYMENT LANDS TO SUPPORT EMPLOYMENT GROWTH.**

Industrial land development in the region is largely carried out by local Councils. Often Councils are under-resourced to take on this responsibility, in terms of expertise and finances, and constraints to more private-sector investment need to be investigated. Liaison with industry leaders would be a good starting point.

**ACTION 4.4.1 – ENCOURAGE RETAIL AND COMMERCIAL USES IN MAIN STREETS AND TOWN CENTRES TO ENHANCE THE VITALITY AND VIABILITY OF THOSE AREAS.**

See comments on Action 4.2.3. Town centres are crucial to regional communities and they need to be supported. Every centre with an urban population of (say) 10,000+ should have a Retail Hierarchy and proposals for new centres be required to fit with that. Additional zoned development land, supported by the Hierarchy, should be available in every new LEP.

**ACTION 4.5.1 – FACILITATE OPPORTUNITIES FOR A RANGE OF TOURIST EXPERIENCES AND ACCOMMODATION.**

Multi-purpose hostel tourist accommodation should also be encouraged for AELEC, TRECC, Country Music, Ag Quip, and Manilla’s para-gliding events.

**GOAL 5 – Protected water, environment and heritage.**

These initiatives are recognised as important for the well-being of the communities of the region. However, planning for future water supplies to industry and the population also needs to take place within this framework. Local and Federal Governments are planning additional water supply storage, but there is no recognition of that here.

**ACTION 5.1.2 – IDENTIFY MEASURES TO IMPROVE THE EFFICIENT USE OF WATER.**

The regime for stream classifications under Controlled Activities on Waterfront Land remains unclear. Developers and Councils are usually uncertain as to what protection controls should apply to a water course and getting advice from DPI Water pre-DA is difficult. All “streams” should be identified and classified by DPI Water across the region, so that they may be appropriately protected.
ACTION 5.2.1 – PROTECT AREAS OF HIGH ENVIRONMENTAL VALUE.

Biodiversity Certificate and Offset Schemes are essential to provide investment certainty and to mitigate the cumulative effects of development. Comprehensive detailed mapping and strategic planning is required across the whole region, with growth areas being given priority.

ACTION 5.2.2 – IDENTIFY AREAS OF POTENTIAL HIGH ENVIRONMENTAL VALUE IN NEW LAND RELEASE AREAS.

It is unsatisfactory to initiate this action at the rezoning stage or later. See comments on Action 5.2.1. A detailed up-front regional approach is required to give consistency and certainty.

ACTION 5.4.2 – ASSIST THE COMMUNITY TO ADOPT AND BUILD RESILIENCE TO CLIMATE CHANGE.

All LGAs should have comprehensive and up-to-date flood mapping. Advances in mapping technology and modelling methods should allow this to be achieved in a timely and cost-effective manner. This will provide for better planning and give certainty to communities and investors.

PIA welcomes ongoing engagement on the draft New England/North West Regional Plan and is happy to elaborate on any of the matters covered in this submission. Please contact Andrew Swane or David Broyd via 0419 142 350.

Yours sincerely,

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