

## **Attachment 1**

### **Draft North Coast Regional Plan Kyogle Council Submission Matters**

The following provides more specific overall comments and recommendations regarding key aspects of the draft Plan.

#### **1. Introductory Sections of Plan and General Comments/Recommendations**

The following applies to the introductory narrative of the draft Plan which should set the context for the more specific sections including the individual Goals and supporting directives and actions.

##### **Overall Growth Context**

- The Council supports the preparation of a draft North Coast Regional Plan to provide broad contemporary strategic land use planning guidance for the region.
- The document's vision does not reflect the importance of an ageing population to the region's demography and associated land use needs. It also does not provide sufficient focus on the agri-business potential to internally provide for the region's prosperity through increased employment and Regional Domestic Product. The vision's prelude (i.e. "...for a sustainable future, centred on a prosperous community, healthy environment and attractive lifestyle") is regarded as too general, can apply to any region and does not provide any regional distinction.
- The vision should incorporate key land use attributes proactively focusing on the region's agri-business, tourism and lifestyle characteristics as well as its natural beauty as its strengths for future sustainable growth.
- The effective implementation of the NCRP must be supported by more detailed sub-regional implementation plans to recognise social, economic and environmental differences as well as provide more individual narratives to identify sub-regional competitive advantages. The importance of these plans, in helping to differentiate sub-regional competitive advantages and identify more detailed preferred planning outcomes should be highlighted and explained in more detail in the main NCRP.
- Unlike some other recent regional planning documents across Australia, the Plan misses the opportunity to showcase the growth potential of the region and its sub-regions to potential investors through a narrative which distinguishes it from other regions.
- The Plan should be couched so as to not only be a land use planning tool but also complement other State strategies also recognising its potentially beneficial role as an investment attraction tool. This is regarded to be consistent with the draft Plan's intent of managing 'growth' within the region from a land use perspective.
- The Plan is heavily focused on coastal issues with little reference to rural sector issues other than in very broad, general terms. The cover of the Plan is symptomatic of its

focus on the larger coastal centres with no depiction of any hinterland land uses to balance the importance of non-coastal locations within the Plan's area.

- The Plan lacks contemporary context in terms of potential regional and external growth drivers. This includes any reference to emerging markets for products or services. This includes any reference to the role of SEQ markets or effects of Free Trade Agreements and growing SE Asian markets in terms of tourist visits and destinations for export of produce from the region.
- The Plan's focus on growth is primarily geared towards residential growth, notably housing and appears to base this on past population trends. This extrapolation provides no analysis of any factors that have influenced past growth rates (e.g. Global Financial Crisis) or likely future inter-regional, national or international influences on different sectors and associated growth potential.
- The Plan provides no real account of the influence of growth in South East Queensland, other than recognising the presence of the Gold Coast. The Plan strangely sees the Tweed area supporting growth in SEQ (e.g. providing housing and employment opportunities) and does not account for any reversed effects which are likely to be more substantial. There is no recognition of the different SEQ growth corridors, including the Brisbane – Beaudesert/Bromelton corridor which is expected to have a direct effect on the Far North Coast Sub-region (FNC) hinterland within 15 years.
- The Plan seeks to protect the natural environment and productive rural landscapes which is commendable. However, its approach of promoting growth in the 3 largest urban centres and ignoring growth in the remainder of the region is, at best, considered to be an oversight. 34% of population growth is projected to occur outside the 3 'regional cities'. Urban centres (from large regional centres such as Lismore to smaller towns such as Kyogle) have capacity to accommodate significant growth relative to their present populations without significant constraints and Councils have generally planned for the infrastructure to support this.

### **Agri-business and Hinterland Land Use Planning**

- The Plan must be amended to provide a stronger focus on the hinterland of the region, its agricultural potential and specific, hinterland centre growth issues. This should recognise contemporary growth issues in the region's agri-business and agri-tourism business sectors resulting from a number of emerging market opportunities - e.g. South East Queensland and international markets and associated trade.
- The identified improvements to the Pacific Highway are applauded as well as the recognition of this important transport spine to the region and state as a whole. Greater strategic consideration should also be provided for other regionally important transport linkages, including the anticipated importance of the Summerland Way/Mount Lindesay link between SEQ and inland parts of the North Coast Region. While no specific funding commitments need be made at this stage, the strategic recognition of the route and its further planning are considered of key importance to the region's overall land use planning and should be highlighted as an important infrastructure and land use planning matter for the life of the Plan.
- The Plan must consider the potential strategic importance of the Beaudesert/Bromelton Growth Corridor in SEQ and the effects that this is expected to

have on the region over the life of the Plan – noting that the Scenic Rim Regional Council in population alone is expected to double within 15 years.

- The Plan should more strongly recognise the region's transport linkages (road and rail) to SEQ. This should be reflective of overall supply chain considerations affecting the flow of produce to any specific transport hubs in the region (e.g. Casino) and then onwards to markets via other linkages – e.g. notably to export/trade hubs at Toowoomba Airport, Brisbane Airport, Gold Coast Airport and the Port of Brisbane.
- There are no plans or initiatives to promote or support growth of the agricultural sector. This includes any references to specific sub-sectors (e.g. grazing, dairy or horticulture) and how this might affect land needs, settlement patterns and growth opportunities. In particular there is no reference to opportunities that may arise as a result from expanding SEQ and overseas markets due to population growth, new or expanded export hubs (e.g. Toowoomba Airport, Brisbane Airport, Gold Coast Airport and Port of Brisbane).

### Centres

- While the need for careful growth management of larger regional city centres is supported, additional planning outcomes should be provided for other regional centres to support hinterland growth and to recognise the strong relationship that many of the smaller towns and villages have with these regional centres - notably Lismore and Grafton. While the Tweed area is rightfully recognised as an important urban area, its evidence-based role as a city centre for the surrounding sub-region (i.e. as opposed to Lismore-Ballina), is not adequately supported in the draft Plan and does not fit well with Central Place Theory. This is largely due to the proximity of the much larger centres within SEQ and Tweed's effective role as a sub-centre of the much larger Gold Coast conurbation as well as proximity of the Greater Brisbane Metropolitan Area for many higher order services.
- The Plan has a heavy emphasis on coastal matters, including the location and function of key centres as well as in the presentation of the document. While the importance of these locations is recognised and supported, the Plan should be amended to provide more balanced direction and representation of the region's hinterland areas.

### Ageing Population

- The Introduction mentions that the ageing population will have land use and transport implications. **The draft Plan recognises that over 90% of the region's population growth to 2036 will be from people aged over 65 years of age.** This is a hugely significant demographic prediction with significant potential land use planning implications yet the draft Plan has no specific consideration of this matter. Population growth is largely treated in terms of general growth management matters – i.e. identification of urban residential areas, employment areas, etc. Studies undertaken of ageing populations including a recent study by Kyogle Council (i.e. Professor Colleen Cartwright) indicate the significant need to consider new accommodation models including independent living transitional accommodation options (notably in rural locations), the need for improved more accessible health and other services and improved transport (i.e. accessibility) to centres. The draft Plan provides no direction

or actions regarding these important planning considerations for the region are increasing ageing population. More specific regard should be provided to these matters.

## **Governance and Implementation**

- The implementation of the Plan must be facilitated through equitable elected local government representation from across the 3 sub-regions. This includes equal representation from rural hinterland areas to maximise the potential of broad cross-sectional community input to the implementation process and enable appropriate weight to be given to the region's growing agribusiness, its increasing contribution to the regional economy and land use interactions affecting large parts of the region.
- The Plan makes reference to a Coordination and Monitoring Committee. This is to be chaired by the Department of Planning and Environment with a further 4 government agency representatives and only 2 local government representatives. This is notwithstanding that there are 3 sub-regions identified in the Plan. This would provide an immediate unnecessary divide between sub-regions and result in potentially poor representation.
- The Plan makes no reference to the proposed Joint Organisations (JOs) or how these might be involved in the implementation of the Plan.
- There appears to be no stated commitment towards more detailed sub-regional implementation plans. This is considered to be a shortcoming of the Plan which misses an opportunity for positive further engagement from councils and sub-regional competitive differentiation.
- The Plan also highlights the proposed Regional Cities Steering Committee. While this initiative is supported, a similar emphasis should also be provided for rural sector centres particularly as any marginal improvements in planning or realisation of sustainable land use potentials can have proportionally greater beneficial impacts on affected communities and long term productivity within the region.
- The Plan could be clearer as to how it is to be implemented by councils through the plan making and development assessment processes. While it is recognised that this is expressed in legislation, the Plan is likely to be a first introduction to the region for many readers and a clearer implementation context could be useful.
- The Plan is written in terms of "The NSW Government will require councils to ....." (see page 19). This tone can appear unnecessarily condescending towards local government and may lead to perceived disharmony amongst readers, particularly potential investors. The Plan would benefit from a tone which engenders a stronger partnership approach – e.g. "the NSW Government will work with councils to ....." or just "Councils will .....".
- The Plan identifies 3 sub-regions but does not appear to commit to developing sub-regional plans. Kyogle Council considers sub-regional plans to be critical in defining sub-regional competitive advantages, particularly as this sort of differentiation is not clearly addressed in the Regional Plan. The Plan should identify how these sub-regional plans are to be prepared, monitored and value they are expected to bring to land use planning across the region.

- The Plan contains 5 Goals that seek to create economic growth, preserve the environment and rural landscapes, focus growth opportunities (emphasise growth of Tweed, Coffs Harbour and Port Macquarie), provide appropriate housing and provide improved transport. Whilst this is a comprehensive suite of policies they are not sufficiently integrated through the Plan so as to show the land use relationships throughout the region or its sub-regions. This is especially the case in relation to transport linkages and the importance of supply chains (notably for agriculture) in influencing the changing role and growth of centres and linkages between centres.

## 2. Goals, Directions and Actions

The following provides specific comments and recommendations regarding each of the the five goals shown in the draft Plan.

### Goal 1 – A natural environment and Aboriginal and historic heritage that is protected, and landscapes that are productive

- While the draft Plan identifies the importance of agriculture to the region and the need to protect agricultural land, it does not identify any specific growth opportunities for agri-business. This is contrary to the intent of the *NSW Agriculture Industry Action Plan* which identifies agri-business as a key sector of the state's economy. The Far North Coast sub-region and Kyogle in particular, have relied heavily on agriculture during their development and have recognised at local levels the opportunities that are available as a result of recent free trade agreements, expanding market opportunities and in particular growth and demand in the South East Queensland region situated to the immediate north.
- The Plan provides no high level reference to the growth opportunities for agribusiness, its effects on other related business sectors (e.g. agri-tourism), the sector's needs, likely catalysts for growth or other associated land use and supporting infrastructure services implications. This is in stark contrast to other contemporary state and federal government frameworks for agriculture across the nation e.g. joint federal, state and territory governments '*Developing Northern Australia*' initiative.
- Inclusion of agriculture and rural production primarily as a 'rural landscape' issue has the potential of under-valuing one of the region's real strengths and its potential for increased prosperity for hinterland areas within the region. The NCRP should align with the language of the *NSW Agriculture Industry Action Plan* which refers to agri-business as a key component and opportunity of the State's economy. This can be achieved through additional statements in the narrative to Goal 1 and may include an inset example of an emerging agri-business leading a transgression from low employment primary production to high employment value-adding – e.g. blueberries in Kyogle.
- Agriculture is seen in the draft Plan primarily as a land management issue and not as a broader range of land uses that have any particular relationship to communities, support for different hierarchy of centres, infrastructure or other land uses. The focus in the draft Plan is on mapping of agricultural land. While this is important, the draft Plan says little about agriculture in terms of any particular sectors other than timber. No mention is made of the resurgence in dairy and beef production or the importance of organic or other niche markets and their potential land use influences, sometimes competing, on a growing region (e.g. issues that may arise with value-adding aspects

including location of packing sheds, intensive livestock farms and use of roads and other infrastructure. The draft Plan should unambiguously recognise and support agri-business as a key component of the region's growth while also demonstrating leadership by requiring the preparation of plans to support any emerging agri-business opportunities at the sub-regional or local levels including infrastructure support plans.

- *Action 1.2.3* - The Upper Clarence catchment has not been mapped by the North Coast Farmland Protection Mapping- this area needs to be captured as a priority of the NCRP to demonstrate commitment towards agricultural planning in the sub-region and enable more effective land use planning and help support agri-business investment decisions.
- There is no or little mention of infrastructure to support agriculture. Agriculture is poorly recognised as an economic contributor to the region, notably how this may have the potential to help re-invigorate some rural villages and larger centres. The role of infrastructure and its support for agri-business as one of the mainstays of rural production and economic development is considered critical in providing for an effective strategic planning and growth management framework for rural locations including their centres. This should be strengthened in the NCRP.
- In the case of Kyogle, the Plan should recognise the strategic importance of the Summerland Way and Mount Lindesay Highway for agri-business and other sectoral development, as well as other servicing routes along this spine.
- The draft Plan fails to explore or provide sufficient strategic guidance in relation to hinterland agricultural transport needs and associated implications for general land use and growth planning – e.g. impacts of providing a second Clarence River crossing at Grafton and a direct linkage to Toowoomba's Wellcamp Airport, the SEQ Bromelton State Development Area, the Brisbane Metropolitan Area and the export hubs of the Brisbane Airport and Port of Brisbane.
- While other NSW regions and Sydney are also important markets for produce and other opportunities in the North Coast, the Far North Coast in particular is much more heavily economically aligned with SEQ. This needs to be much more strongly recognised in the NCRP, including highlighting the use of special Cross-Border Commissioner resources to help integrate planning needs across the two states, thereby paving a way for greater economic efficiencies and enhancement for investment.
- *Direction 1.4 – Adapt for natural hazards and climate change.* The Plan (see page 26) talks about permitting a flexible approach towards innovation in farming practices and new emerging industries, including through planning controls. It is unclear what this may include or how this may be implemented through LEPs or other environmental planning instruments. This should be further clarified.
- *Direction 1.5 – Deliver economic growth through sustainable use of, and access to, mineral and energy resources.* This flags the ongoing presence of coal seam gas (CSG) potential in the Far North Coast sub-region. The FNC Sub-region has been under the impression the issue of CSG has been dealt with through the buyback of existing petroleum exploration permits during 2015 and early 2016. CSG and other mining matters are generally dealt with under separate legislation and State statutory instruments. This includes the *State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007* which presides over any other planning instrument where any inconsistencies exist between the SEPP and the

instrument. While the NCRP cannot purport to over-ride the provisions of the SEPP, as an equally strategic document and in the absence of any other clear strong support for CSG from many sectors of the region's communities, the NCRP should omit any reference to CSG as a possible land use in the Far North Coast sub-region.

- *Action 1.5.1-* Facilitate investment in the resources and energy sector. The action states that *'The NSW Government will identify and plan for the infrastructure needs and requirements of the resources and energy sector'*. A similar approach and statement should be provided for other economic drivers for the region – e.g. agri-business, agri-tourism and nature-based adventure/leisure tourism, all of which provide for long term sustainable land uses in the region.
- *Page 28* has confusing text relating, on one hand, to resource extraction (see Direction 1.5) and broader coastal management issues as referred to in the insert. There appears to be no clear relationship between the two matters. It is recommended that the inset be removed.

## Goal 2 – Focus growth opportunities to create a great place to live and work

- The Plan is heavily focused on urban growth in the larger city regions with little narrative for the opportunities or preferred planning outcomes of other centres including regional centres like Lismore. The importance of regional centre growth to nearby smaller (rural) centres and hinterland is largely overlooked by the Plan and should be addressed more strongly.'
- Unlike the centres of Coffs Harbour and Port Macquarie (which are 'stand-alone'), Tweed is much more heavily influenced by the attraction powers of the much larger centres of Gold Coast and Brisbane. Lismore has, to date, been the dominant day-to-day centre for the Far North Coast, excluding people that live in Tweed and also for the increasing importance of Ballina as a regional centre on the coast. Where people have not been able to get what they need in Lismore (or the other smaller centres), they are likely to by-pass Tweed all together – heading instead to Robina, Pacific Fair, Browns Plains/Logan or Brisbane itself. The latter two are of likely increasing interest to people living within FNC hinterland areas. Lismore has and is expected to continue playing a strong role in providing health, education and government services to the sub-region. Growth should be encouraged around the centre in a sustainable manner so as to take advantage of the existing levels of service and provide for higher thresholds for improved services more effectively. The benefits of this are much more likely to radiate outwards to other smaller centres rather than where these types of centre roles are 'directed' to the Tweed.
- Lismore is centrally located and is accessible to a range of smaller centres and people within the sub-region. 'Tweed' is a poorly defined regional city with no clear centre. The centres of Tweed Heads and Murwillumbah are quite distant and each individually does not provide the level of service provided by Lismore. The other centre, Coolangatta, is not in NSW. The Tweed is generally regarded to be much more aligned with the greater Gold Coast Region. Accessibility to the Tweed for people within the North Coast Region is poor other than for people along the coast – i.e. Pacific Highway. The NCRP should continue to recognise the 'Tweed' as an important urban centre (even possibly a regional city) but it should also acknowledge the special circumstances and role of Lismore as a major regional centre, its role and

benefits to other surrounding smaller centres and the potential economic leveraging effects for smaller centres if Lismore has strong and steady growth.

- *Direction 2.2 Cross border planning* - There is no mention of the Bromelton State Development Area within Queensland's Scenic Rim Regional Council. This is expected to have Kyogle located on the edge of an important SEQ growth corridor within the next 15 years which is expected to have a significant influence on the economy of the Kyogle LGA and other surrounding rural councils. This important influence for the planning of the FNC hinterland should be more clearly addressed in the NCRP.
- *Direction 2.4 - Provide good places to live through good design.* The Direction encourages precinct plans by councils. While this may be beneficial to some councils, the existing statutory planning framework does not facilitate strong precinct or structure planning at an LEP level other than where the area is identified as a growth area or precinct. This is generally left to a DCP level or to inform rezoning proposals. Clarification as to the preferred mechanisms to provide for LEP-based precinct plans should be provided in the Plan, including any for any preferred areas.

### Goal 3 - Housing choice, with homes that meet the needs of changing communities

- The draft Plan seeks a mix of dwelling types and sizes as well as reduction in lot sizes. This is generally supported. The actions should include the need to consider new models for housing for older people, especially those that may wish to progress to independent living transitional housing arrangements prior to higher care accommodation. This includes rural towns and villages.
- Value rural areas with high lifestyle attributes, such as Kyogle, have the potential to become increasingly sought for permanent and lifestyle accommodation, including for people working in nearby growing larger centres such as Lismore. The draft Plan should recognise this as an opportunity over the life of the Plan which may influence current housing demand projections.
- *Direction 3.1 Provide sufficient housing supply to meet demand* - The Plan only identifies an expected demand for additional 150-180 dwellings for Kyogle over the next 20 years. This is based on past trends which have been off the back of declining economic conditions due to the GFC and other factors. This assumes that the situation of the past 5 years will remain static and provides no account for any other growth factors already discussed in this report – e.g. SEQ and overseas market growth. The NCRP should either use revised growth figures or acknowledge that as yet unknown growth may be expected within the region as a result of these factors and that this situation is to be monitored.
- *Action 3.2.1 - Investigate the policies, plans and investments that would support greater housing diversity.* The draft Plan is non-specific as to how councils are to provide for increased multi-unit housing. While the objective is supported, clearer guidance should be provided.
- *Action 3.3.1 - Facilitate the supply of more affordable housing.* The draft Plan states that Councils should consider facilitating affordable housing through model LEP provisions that require a proportion of new development to be affordable, use of more flexible development controls and reduced s94 contributions. While these initiatives are supported in principle, the Plan should recognise that these may have only limited



effect in rural locations and that other initiatives regarding innovative design and partnerships may also be potentially important.

#### Goal 4 - A prosperous economy with services and infrastructure

- The discussion of growth is very regional city centred and deals almost exclusively with residential accommodation growth. Tourism is primarily focused on the coast understating the importance of tourism or other economic sectors for growth in rural hinterland areas like the Kyogle LGA, or forms of development that may be considered acceptable or otherwise and any specific infrastructure support that may be required – e.g. need for good access to and from larger urban areas. The NCRP should provide further clarification regarding these aspects.
- The focus on the regional cities understates the importance of the regional centres, notably Lismore and Grafton. More detailed narratives, actions and directions should be provided for these centres and how they relate to surrounding smaller centres.
- *Direction 4.1 Expand tourism* - The Plan focuses on the coast with little or understated mention of the hinterland. Preferred forms of development are not adequately addressed.
- There is limited discussion of the potential for growth of the agricultural sector as an important part of the region's prosperity – see earlier comments in this report.
- There are no stated initiatives or policies regarding infrastructure to support industry and employment. The Plan suggests that recent investments mean that existing infrastructure is adequate to cater for anticipated growth. The NCRP should consider longer term strategic infrastructure needs including the development of the Summerland way-Mount Lindesay Highway hinterland road corridor for freight and domestic travel between the region and SEQ.
- The draft Plan's mention of employment centres, while supported as a concept, should be clarified in terms of the influences of SEQ on the centres hierarchy for the region and skewed increased importance of Lismore as a result – see earlier comments in this report.

#### Goal 5 –Improved transport connectivity and freight networks

- The emphasis in the draft Plan is on the Pacific Highway. Limited detail or initiatives regarding regional roads exist in the draft Plan which refers only to NSW Transport programs. The importance of transport links, notably road, for land use development and planning within the region should be more strongly emphasised in the final Plan. While freight is acknowledged as being of key importance, improved freight networks are also expected to improved access for non-freight travel requirements which can bring additional benefits to the region e.g. enhancement of locations for living, employment and tourism due to reduced travel times.
- The Plan misses the opportunity to identify other strategic transport corridors, including the Summerland Way/Mount Lindesay Highway, notably as a key link to the SEQ Bromelton State Development Area as well as linkage to the Southern Darling Downs, including the Toowoomba Wellcamp Airport (i.e. as an international export

hub). The Plan should recognise these important linkages for future growth support within the region – notably for FNC hinterland development.

- The Plan only provides minimal comment regarding public transport needs and how this is expected to influence future land use planning decisions within the region. Public transport is expected to be an important aspect of ‘smart cities’ development. This should include the importance and relationship of public transport in terms of centre hierarchies and relationships with smaller centres and surrounding regions serviced by defined cities and larger urban areas.
- *Action 5.3.3 Future rail corridors* – The draft Plan states NSW Government will ‘work with other governments to plan for future rail corridors on the North Coast’. No details are provided as to corridor locations or how they are to be determined, expected sources of likely demand, or likely land use implications. Further clarification regarding these matters should be provided.

Kyogle Council, Planning and Environment Department

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