

5 March 2008

Mr. Sam Haddad
Director-General
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Mr Haddad

Re: Mid North Coast Regional Strategy; Exhibition of Draft Growth Area Maps

We write in response to the current exhibition of the Mid North Coast Regional Strategy Draft Growth Area Maps. You will recall that in April 2007 we commissioned consultants Macroplan Australia to review the Draft Strategy Document on exhibition at that time, and prepare a comprehensive submission on our behalf. A copy of the submission is attached. It raised a number of concerns with the base data, analysis, assumptions and correspondingly, outcomes presented in the draft document and concluded by presenting a list of eight matters that we considered prudent to be incorporated and addressed in the final document.

First and foremost, the Urban Taskforce is vitally concerned that NSW enjoys access to a robust, thorough and dependable planning system. This requires confidence and surety for both the development industry and the wider community for future urban development, environmental protection and economic and social improvement.

You will note that one of the points in our April 2007 submission raised a concern regarding the lack of presentation of any detailed land use plans within the draft strategy. We note in the current exhibition that this concern has been addressed and we consider the additional detail presented in the plans will enable interested parties and the community to gain a better appreciation of the planning strategies proposed for the Mid North Coast of NSW.

In saying that, however, we have reviewed the draft growth area maps and supporting information on the Department's website and have identified a number of matters that we consider need to be addressed in the final Strategy.

These are presented below.

Response to March 2007 Exhibition

Firstly, we must commence with our submission to the March 2007 exhibition of the Draft Strategy Document.

As described above, in response to the Department's invitation, we commissioned respected consultants Macroplan Australia to review and provide comment on the draft strategy. The Macroplan report noted a number of fundamental flaws with the base data and the subsequent extrapolation of demographic and dwelling projections adopted by the Strategy. The observations made by Macroplan were neither ingenious nor provocative, but were presented constructively to assist in the preparation of a robust and dependable document. Many of the comments were simple observations, such as a failure to adopt ABS

2006 household and population census data (resulting in inaccurate population increase, dwelling demand and employment land demand forecasts).

In light of the effort that we expended on preparing a submission on the first exhibition, we must express our disappointment with the current exhibition documentation. Our disappointment runs to two matters:

1. **Base data adopted:** It is apparent from the single page information pamphlet that accompanies the maps that no regard has been paid to the comments in our previous submission. We would have expected that our identification of such fundamental flaws in the base data adopted to forecast population growth and dwelling demand would have been rectified in the second submission containing the maps. However we note that in Part 1 "Background" of the exhibition material, the Draft Strategy continues to use the flawed numbers adopted in the first exhibition. Therefore, we reiterate our previous comment that the Department must revisit the base data that it has used to forecast growth and demand in the Mid North Coast and correct the obvious flaws in its adoption of the base data in order to ensure that the final planning strategy is both dependable and as accurate as possible in its projections. Without data corrections, the draft growth area maps may be flawed and consequently may not present a dependable or robust planning framework to guide the future development and use of lands in the Mid North Coast.
2. **Acknowledgment of exhibition comments:** Ordinarily, following any submission made by an interested party (be it an interest group, local resident or other party) on a proposed planning matter, it is common practice, and a matter of courtesy, for the submitter to be provided with the opportunity to view and appreciate a response to their submission. This is generally in the form of documents, which report on the exhibition and are particularly important where the submitters comments are adopted, or are dismissed, in order to ensure a transparent plan making process ensues. In this instance, following from our comments in the point above, we must express our strong disappointment that the current exhibition does not appear to have responded to our earlier submission, either positively (through modification), or negatively (through report back with valid explanation as to why our suggested modifications were not adopted). We request that the Department provides an explanation as to why our comments provided previously were not considered to merit adoption and modification of the Draft Strategy in the current second exhibition.

Draft Growth Area Maps

We have identified a number of other matters that we request the Department to review and consider in its preparation of the final Growth Area Maps (and correspondingly the Final Strategy). They are:

3. **Paucity of explanatory information:** The information that accompanies the Draft Growth Area Maps comprises the information sheet and poster. Neither document presents a detailed analysis that matches land demand to supply. It raises a number of significant questions including:
 - is sufficient urban and employment land identified to meet the projected needs of the region/local government areas (LGAs) (i.e. does the quantum of land indicated in the maps accommodate projected need)?;
 - furthermore, what impacts will the significant environmental constraints have on the development capability / potential of each proposed release area (i.e. will the inevitable erosion of land available for development jeopardise the potential development yields envisaged in the release area – for example over 50 per cent of the proposed release area in Port Macquarie (Map 7) would appear to be environmentally constrained)?;

- have enough major new urban release areas been identified which will offer the desired lifestyle and amenity demanded by some new residents relocating to the area; and
- are the locations of the proposed employment lands the most appropriate given the presence of the upgraded Pacific Highway, deep water port at Yamba and advanced aviation infrastructure at Coffs Harbour (e.g. no new employment lands are proposed in close proximity to Yamba)?

4. **Lack of clarity on the opportunities presented by the strategy:** The Draft Mid Coast Regional Strategy commences with the opening line "The Mid North Coast – A Region of Opportunity". However the opportunities presented by the maps are not clearly defined. For example:

- most proposed urban release areas in the maps may be heavily constrained;
- furthermore, as noted in the information sheets, the identified proposed urban release areas and employment lands are generally not new, and comprise a collation of areas already identified in various local planning strategies or rezoning proposals; and
- there appears to be no consideration of any major infrastructure investment proposals to guide new settlement patterns.

The last point, above, is important. Linkages between settlement opportunities and investment in infrastructure appear to be weak or absent in the maps. There do not appear to be any significant or strong relationships between the existing infrastructure assets of the region (e.g. airports, ports and roads) and the settlement and employment patterns proposed within the region.

Furthermore, whilst the Draft Strategy report presents, in the appendices, a list of proposed infrastructure works, many of the "major Infrastructure works", such as a proposed video conferencing facility at Grafton are hardly 'major' and present little influence in guiding the appropriate location of an urban settlement framework. The Draft Strategy, including the maps - in order to be all encompassing - needs to identify the assets of the area. It needs to identify the private investment and public infrastructure opportunities presented by these assets and then it must proceed to link these potential opportunities with urban settlement patterns.

5. **Growth dynamics of South East Queensland:** The area north of Grafton is to a very large extent influenced by the major growth dynamics of South East Queensland, a factor that was also ignored in the original draft of the Mid North Coast Regional Strategy.

This serious flaw in the Department of Planning's development of the Mid North Coast Regional Strategy needs to be examined, particularly taking into account that South East Queensland's exponential growth will have significant impact on coastal development pressures, and indirectly on towns located off the coast, in the short and medium term. This situation will particularly impact the Yamba and Maclean sub-region.

As discussed, the draft Growth Area Map does have some positive aspects.

6. **Further investigation of draft growth areas:** It is pleasing to see that some draft growth areas have been identified for further investigation. The draft growth areas have the potential to provide urban land which offers the amenity and lifestyle opportunities sought by people moving to the region.

The ability of these additional areas to supplement the region's urban land supply is particularly important, given the environmental constraints likely to reduce yields from

those growth areas, already identified in planning strategies or zoning proposals, and shown on the draft map.

The Department's approach to the resolution of the North Arm Cove "paper subdivision" is considered an appropriate strategic response to this long standing regional planning issue.

Conclusion and Summary

In conclusion, we support:

- the Department in its initiative in proceeding with the preparation of the regional strategy for the Mid North Coast; and
- the Department's continued investigation of additional draft growth areas as a means of ensuring a supply of land with the attributes sought by the region's future residents.

However we continue to have concerns with the Draft Strategy and maps in their current form. Primarily our concerns lie with the following matters:

- lack of apparent consideration of the comments in our previous proposal concerning, inter alia, weaknesses in the base data and assumptions used in the draft planning document;
- as part of the above, a failure to provide a response to the consideration of our comments in our previous submission;
- correspondingly, the potential adoption of flawed background analysis in the preparation of the growth area maps;
- possibly - as a result of the above - an apparent lack of connectivity and weak relationships between the background analysis, infrastructure and environmental assets of the region and the land use proposals presented in the maps, questioning the reliability of the land use proposal presented therein and the value that they present to both the community and the development industry; and finally
- a lack of in-depth investigation and analysis of the area resulting in no tangible strategies that contain new and significant initiatives for further economic development, social progression and environmental enhancement of the region.

As per to our discussions with your Executive Director, Mr Richard Pearson, at our meeting on 4 February 2008, we will be in contact with Mr Pearson to set-up a meeting between him and ourselves (together with a small number of Urban Taskforce members) to further discuss our submission.

Yours sincerely

Urban Taskforce Australia



Aaron Gadiel
Chief Executive Officer

Encl.