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Mr Chris Gulaptis MP
Parliamentary Secretary for the North Coast
11 Prince Street
GRAFTON NSW 2460

NSW Business Chamber Limited
140 Arthur Street
North Sydney NSW 2060
Postal address
Locked Bag 938
North Sydney NSW 2059
DX 10541 North Sydney
t 13 26 96
f 1300 655 277
e businesshotline@nswbc.com.au

Via email: northcoast@planning.nsw.gov.au

Comments on the Draft North Coast Regional Plan

Dear Mr Gulaptis

The NSW Business Chamber (the Chamber) welcomes the opportunity to review the draft North Coast Regional Plan and provide feedback.

As you are aware, the NSW Business Chamber is a member-based organisation that operates across NSW, with around 20,000 members across the State. The Chamber works closely with local Chambers of Commerce and represents the interests of regional businesses, including through its offices in both the Mid North Coast and the Northern Rivers. Through its engagement with businesses across the state and across industry sectors, the Chamber provides an important communication platform between business and policy makers be it at the local, regional, state or national level.

The Chamber is in broad support of the actions identified under the plan but makes some comment on each action item and on the direction of the plan overall and its vision to build a sustainable future, centred on a prosperous community, healthy environment and attractive lifestyle choices.

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

The Chambers recognise and strongly support the need to maintain our natural environment.

While it may raise a broader issue than that being capable of being dealt with under the Draft Regional Plan, a number of Chamber members have raised concerns regarding the impact of environmental zones under the standard instrument LEP and the impact these zones can have on existing landholders in restricting operations such as holiday parks.

This is an area in which the former Minister for Planning, the Hon. Brad Hazzard committed to address indicating in a media release titled *Environmental E2 and E3 zones to be reviewed in North Coast LEPs* and dated 20 September 2012 that “*this Government is not going to stop*

farmers and other existing landowners from carrying on their businesses through overly restrictive environmental zones". Obviously, this was stated under a different Minister under a Government with a different leader, however the issue remains. We note the proposed actions under this goal are to identify *"complementary activities in rural zones"* and while we support this, there is a need to address the fundamental issue in the standard LEP. Doing so will serve to increase the communities confidence in appropriate land use in environmentally sensitive areas. We encourage you to raise these concerns with your parliamentary colleague, the Minister for planning, the Hon Rob Stokes MP.

Goal 2 – Focus Growth Opportunities to create a great place to live and work

We welcome the focus of the plan on developing growth opportunities and developing jobs closer to home.

We do note however that although there is recognition under Action 2.2.1 *Collaborate with relevant authorities to understand the implications of growth in South East Queensland on the far North Coast*, we believe that more fundamental work has to be undertaken to ensure that the region is on a competitive footing with our northern neighbour in terms of attracting new investment to drive growth and employment.

A clear example where NSW (and the Northern Rivers specifically) is at a clear disadvantage is in terms of our lack of a flexible planning framework to encourage innovative and entrepreneurial activity. The Queensland Government's State Development Areas¹ provide defined areas of land for industry, infrastructure corridors and major public works that promote economic development. With the State Government controlling developments and approvals in these areas, we have heard anecdotally that a number of businesses, frustrated with the overly complex planning frameworks within NSW, have relocated to Queensland to take advantage of these development areas. Opportunities to establish similar development areas within NSW, particularly in the North Coast region, should also be pursued as a priority.

We also recognise Action 2.3.2 to *Identify residential, commercial and industrial uses in urban growth areas by developing local growth management strategies*. The Chambers are well aware of the encroachment of uses, including residential uses on industrial land has been a prevailing and increasing trend over the past two decades. With the absence of a robust planning framework that protects and preserves industrial uses in their current location, industrial land is under continual threat.

¹ See <http://www.statedevelopment.qld.gov.au/coordinator-general/state-development-areas.html>

State and local governments need to show commitment to the use of land for industrial purposes by resisting change to industrial land use unless there is a clear strategic benefit in doing so.

Industrial land is a scarce commodity and the availability of it is absolutely vital for investment, economic growth and employment.

Business Chamber members have raised specific concerns around residential development being approved near to existing industrial land and how such approvals have impacted on their operations. One Chamber member in Coffs Harbour has advised that as a result of new residential development in proximity to his business, truck movements have been significantly curtailed and he has been required to put in place noise abatement measures at his own cost. This particular site has been used for more than 30 years and is a key employment area for the entire Coffs district.

With level land for industrial development in short supply and with another block of residential development scheduled nearby, this business is seriously considering moving its operations outside of the region. This example sheets home that while housing development is a vital part of land use planning, it should not come at the expense of economic development which is just as vital in building vibrant healthy communities.

While the initiatives under the draft plan will hopefully provide a far greater capacity for local and state governments to work together in developing future industrial estates, it's critical that more is done to protect and support existing operations in industrial areas.

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

We welcome the commitments in the plan in relation to the provision of housing choice and the need for these choices to reflect the needs of our diverse communities.

We note and support Action 3.3.1 *Facilitate the supply of more affordable housing* in particular strategies to reduce “contributions or other development incentives that may boost construction of secondary dwellings as alternative affordable housing”. The Chamber has previously raised concerns with the developer contributions charged by some north coast councils for the development of “granny flats”. We believe that the development of such secondary dwellings can play an important role in the provision of affordable housing in our region and developer contributions should not be utilised as a financial disincentive for such structures being established.

Goal 4 – A prosperous economy with services and infrastructure

The Chamber was a vocal supporter of the state governments proposal to lease NSW poles and wires to help fund more than \$20 billion in new investment in new infrastructure across the state. We continue to engage with the Government to encourage the roll out of this investment in particular the \$6 billion earmarked for investment in regional NSW.

While we obviously support investment in new transport and road links throughout the region, we also support investment in education and health infrastructure as such investment plays a critical role in terms of attracting and retaining workers and their families to the region.

We strongly support Action4.1.1 *Facilitate the nature based, events and cultural tourism sectors on the North Coast* in particular the proposals around developing rail trails for tourism activity. The Chamber's Tourism Industry Division raised this issue as part of its 2011 **NSW Visitor Economy – On the Move**² pre-election document and continues to advocate for Government to focus on these opportunities to grow the sector.

Goal 5 – Improved transport connectivity and freight networks

As noted above, the Chamber strongly support new investment in transport links to the region and the critical need for state and local government to work in a collaborative manner to increase our transport capacity and connectivity.

With that said, the Chamber does hold concerns that the Plan makes no mention of port capacity. The Chamber is aware that there are co-ordinated discussions occurring at senior departmental level to increase the capacity of Coffs Harbour. The port at Coffs Harbour presents a significant economic opportunity for the region and should be included in the final draft.

Owning the Plan

While we welcome the opportunity to comment on this draft, like any other planning document, the best results from the draft North Coast Regional Plan will only be achieved through close collaboration between government, industry, and the local community and a solid commitment to delivery.

The Chamber is concerned that in its proposed form the Coordination and Monitoring Committee does not have industry representation, and therefore will be unable to adequately address the current and future needs of local businesses. Similarly, with a key governance action under the Plan

² https://www.nswbusinesschamber.com.au/NSWBCWebsite/media/Policy/Tourism/NSW-Visitor-Economy-on-the-move-Final_v4-pdf.pdf

(Action 2.11) to establish a Regional Cities Steering Committee provides no mention of industry input, we believe this is a critical error in ensuring that local industry is engaged in owning and ultimately delivering the plan.

Regional Cities

The Chamber is concerned that focusing on the three regional communities classified as "Regional Cities" risks widening the economic gap between them and the rest of the region.

By focussing government attention on Tweed Heads, Coffs Harbour and Port Macquarie, the Government is encouraging the shift of services and jobs away from the smaller towns that can often least afford to lose them.

While the Chamber accepts the concept of centralising core services across the region as a way to deliver them more efficiently, we believe that picking only three winners amongst the scores of communities in the region sends a signal that they are the only three areas worthy of investment. The final Plan must acknowledge the importance of supporting the growth of the whole region.

Monitoring and Reporting

Finally, the Chamber is concerned that there is no proposed mechanism to adequately monitor, evaluate and report on the progress of the Regional Plan. Strict timeframes for each activity and overall accountability will give industry the confidence to contribute to the Plan and invest in the region.

Once again, we thank you for the opportunity to provide input to the draft plan. Please feel free to contact us on the details below if you would like to discuss any aspect of this submission further.

Yours sincerely

Signed

Signed

Kellon Beard

Regional Manager - Mid North Coast
NSW Business Chamber
Kellon.Bead@nswbc.com.au
0427 767 246

John Murray

Regional Manager - Northern Rivers
NSW Business Chamber
John.Murray@nswbc.com.au
0419 260 220