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Department of Planning and Environment

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# Submission summary and engagement report

New England North West Regional Plan 2041

September 2022



*Mt Kaputar National Park, Destination NSW*



# Acknowledgement of Country

The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the Traditional Custodians of the land and we show our respect for Elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

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# Introduction

In 2017, the Department of Planning and Environment released the New England North West Regional Plan 2036, one of nine regional plans in NSW. It establishes a vision and direction for strategic land use planning and addresses the New England North West region's future needs for jobs, housing, infrastructure, a healthy environment and connected communities.

The *Environmental Planning and Assessment Act 1979* (EP&A Act) requires five-yearly reviews of regional plans. The Plan has now undergone its first five yearly review. Since the release of the Plan, the region has experienced drought, floods, bushfires, and the COVID-19 pandemic. These events will have lasting impacts on the economy, infrastructure, social systems, the natural environment and community wellbeing. The review process has considered these events alongside an evidence base that analyses population growth and change, the regional economy, infrastructure, housing and employment markets, the location of important environmental resource areas (including renewable energy resources), natural hazards and resilience.

Throughout 2021, the NSW Government consulted widely with councils and other stakeholders including the community, to review the Plan and to develop an updated vision that resets priorities for the region over the next 20 years. The updated Plan identifies priority actions and informs councils' land use planning and delivery of infrastructure for all government agencies. The updated Plan responds to growth and change and provides guidance on the NSW Government's approach to creating a strong and successful New England North West region.

The New England North West Regional Plan 2041 applies to the 12 local government areas of Armidale, Glen Innes Severn, Gunnedah, Gwydir, Inverell, Liverpool Plains, Moree Plains, Narrabri, Tamworth, Tenterfield, Uralla and Walcha.

This report summarises the consultation and feedback received both in the lead up to and during the formal public exhibition process to review the regional plan. It also details the types of submissions received, the themes raised and the NSW Government's response. The responses have guided the preparation of the final New England North West Regional Plan 2041.

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## Review process

The review of the Plan occurred in five stages.



### Stage 1 – Research and engagement

Review of the New England North West Regional Plan 2036 commenced with a survey of councils and relevant agencies within the region. The survey aimed to understand the strengths and weaknesses of the plan to inform how it could be improved in the second iteration. The findings of the survey informed a ‘bluesky’ workshop, held in February 2021 with councils from the region.

An independent gap analysis and a review of the evidence base was undertaken early in the review process. The results of this work informed the preparation of the updated Plan.

### Stage 2 – Drafting

Drafting occurred from March – October 2021. Briefings were undertaken with New England North West Delivery, Coordination and Monitoring Committee which includes representatives from key NSW state government agencies and the Namoi and New England Joint Organisation of Councils.

### Stage 3 – Exhibition

A formal exhibition period ran from 22 November 2021 to 18 February 2022. Exhibition was managed through a central online exhibition hub and submissions were accepted through the NSW Planning Portal. The engagement section of this report details the schedule and outcome of exhibition activities.

### Stage 4 – Consideration of submissions and plan refinement

52 submissions were received during the exhibition period. The submissions and results of the exhibition activities were carefully considered by the department between March and July 2022 to develop the final New England North West Regional Plan 2041.

### Stage 5 – Release of final Plan

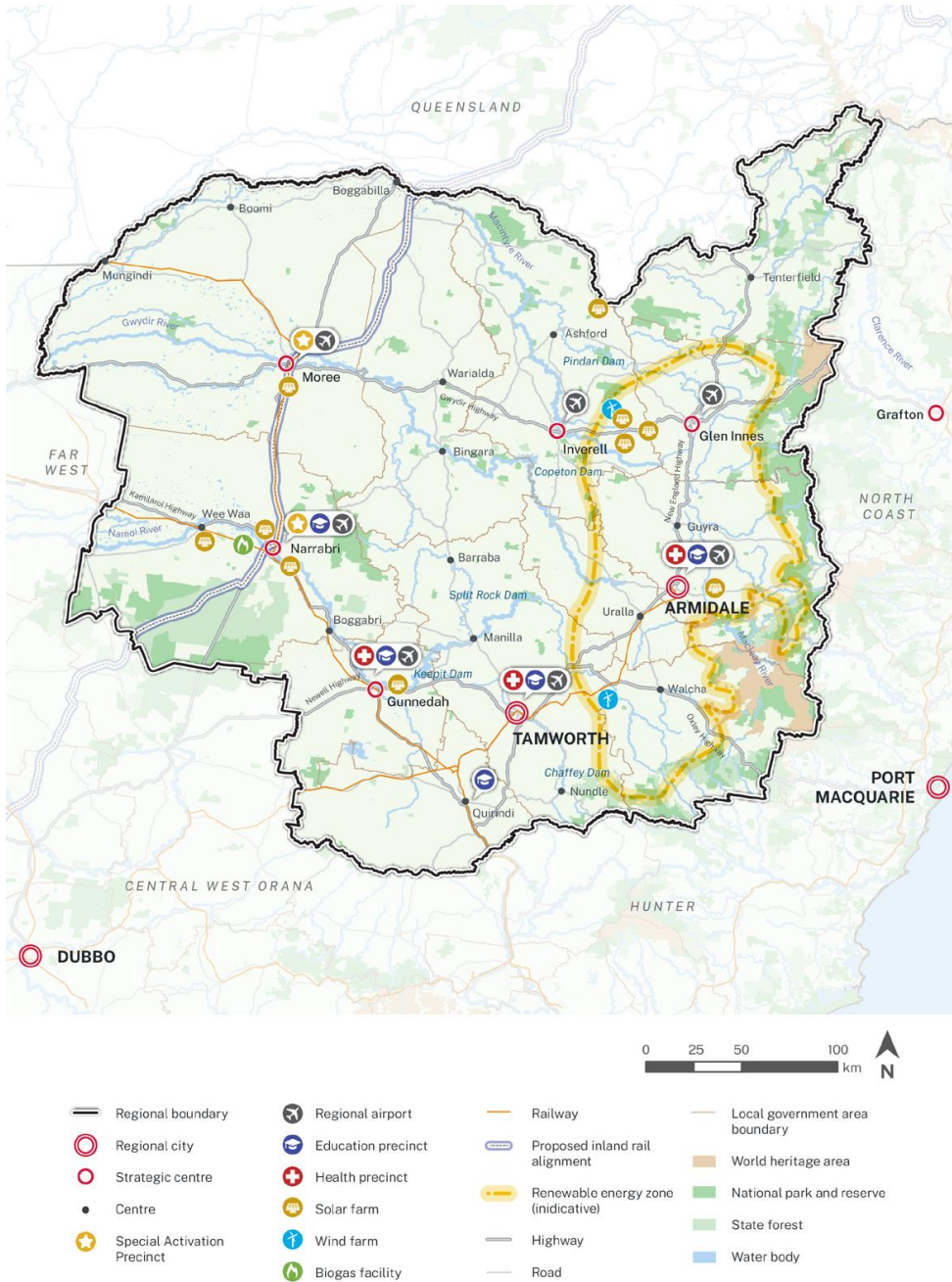
The final Regional Plan was released by the Minister for Planning and Homes on 20 September 2022. The New England North West Delivery, Coordination and Monitoring Committee will oversee the implementation of the Plan. See the Implementation Plan 2022-2025 for further information.

# New England North West Regional Plan vision and map

The vision of the Plan is that in 2041, the New England North West region will be characterised by *Healthy and thriving communities, supported by a vibrant and dynamic economy that builds on the region's strengths.*

The New England North West Regional Plan area map (Figure 1) illustrates the area the Plan applies to.

Figure 1: Map of the New England North West region



# Engagement

## Overview of engagement program

The draft New England North West Regional Plan was on public exhibition from 22 November 2021 to 18 February 2022. Draft regional plans are exhibited for a minimum of 45 days, as required by the *Environmental Planning and Assessment Act 1979*. As the exhibition period for the draft Plan coincided with the Local Government caretaker period and elections as well as the Christmas and New Year period, the exhibition period was extended.

A NSW Government online engagement hub was established the central place for the community to be informed about and share thoughts about the vision and themes of the Plan. Submissions were received through the NSW Planning Portal, which was linked through the online engagement hub.

Communications also included:

- Direct messaging to registered subscribers
- A paid social campaign leveraging DPIE social media channels
- Paid advertising and marketing with the aim of raising awareness of the exhibition period
- Media outreach targeting local outlets.

Due to COVID-19 restrictions, the department successfully ran an online program which consisted of several workshops and briefings. An independent consultation expert assisted the department in facilitating the online workshops.

Table 1 provides an overview of the program and participants.

**Table 1: Overview of engagement activities**

Type	Details	Participants
Online engagement hub and submissions open	22 November 2021 – 18 February 2022	3,345 visitors 52 submissions
Northern Region Aboriginal Land Councils briefing	7 December 2021, in person, Tamworth	Multiple LALCs represented
Council briefing	8 December 2021, online	12 attendees
Council workshop	1 February 2022, online	5 attendees
Council workshop	2 February 2022, online	5 attendees
Community workshop #1	2 February 2022, online	5 attendees

Type	Details	Participants
Key stakeholder workshop	3 February 2022, online	7 attendees
Community workshop #2	10 February 2022, online	14 attendees
Local Aboriginal Land Council workshop	17 February 2022, online	5 attendees

## Online engagement hub

The engagement hub included information about the Regional Plan review process, a project timeline, links to write a submission or register for a workshop and contained two key interactive elements:

1. The Ideas Wall

The Ideas Wall provided representation of the plan as a series of 12 visual ‘tiles’ grouped by colour, with each colour representing four of the key goals of the draft plan. Each tile represented a key theme to achieve the goals. On each tile, users were able to leave a comment in a discussion thread or ‘like’ or ‘dislike’. The ideas wall generated 53 comments, with the themes relating to *Part 2: Productive and innovative* and *Part 5: Connected and accessible* generating the most discussion by site visitors. Comments on the Ideas Wall generally related to specific areas within the region and were of a neutral sentiment.

2. Survey

A short survey comprising of eight questions asked for sentiment and comments about the draft plan’s vision and themes. The survey generated 67 responses from 24 respondents.

Of the respondents, 16 supported the vision for the plan, 5 felt neutral and 3 did not support the vision of the plan. Comments on the vision included that economic production should not occur at the expense of the environment, the vision was quite general and didn’t necessarily reflect the uniqueness of the New England North West Region and comments on the need to support the population of Tamworth to grow sustainably. There were both positive and negative comments regarding renewable energy generation in the region.

Survey respondents were asked to rate the five themes of the draft Plan in order of importance. *Part 3: Sustainable and resilient* and *Part 5: Connected and accessible* were both seen be the most important for the region, followed by *Part 1: Growth, change and opportunity*, *Part 4: Housing and Place* and *Part 2: Productive and innovative*.



## By the numbers:

- Total visits to page (counts people returning to page multiple times): **8,056**
- Unique users (counts users once, no matter how many times visited page) **3,345**
- Ideas Wall Comments: **53**
- Survey Respondents: **24**
- Survey Responses: **67**
- Document downloads: **648**

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## Workshops

Workshops were an important element of the wider engagement activities delivered to support the public exhibition and included briefings and interactive workshops.

Due to ongoing COVID-19 pandemic limitations, all community engagement activities were conducted via an online platform (Zoom), with the aim of reaching council, industry and community stakeholders across the region.

From across the New England North West region, 55 people participated in the briefings and workshops delivered from 7 December 2021 to 17 February 2022. At all workshops, the Department's Northern Region Team presented the details of the plan, the key drivers and changes from the previous 2036 Regional Plan, and how the consultation outcomes will inform the finalisation of the draft Plan and its implementation. Following the Department's presentation, an independent consultation expert facilitated a discussion regarding:

- What participants saw as being the priority for the New England West region over the next five to 20 years
- What aspects of the draft Plan participants supported/agreed with
- What parts of the draft Plan require amendment and/or strengthening
- Whether any aspects of the draft Plan need to be updated
- Whether there are any aspects of the draft Plan that should not be in the final Plan.

The workshops were designed specifically to allow practical engagement and maximise useful feedback.

## Workshop findings

The attendees at the workshops were generally supportive of the draft Plan and its revised vision and directions. The following section summarises the key areas of discussion under each part of the Plan.

### Part 1: Growth, change and opportunity

Most participants expressed optimism about the future of the New England North West region and the opportunities that will benefit communities across the region. In particular, the designation of two Special Activation Precincts (Moree and Narrabri) and a Regional Job Precinct (Namoi) within the region was seen by many as a significant opportunity for the region to leverage economic and community benefit.

Participants from all engagement groups felt that a further explanation for the projected population figures (including births and deaths figures) used within the draft Plan was needed, and noted there is a difference between councils' and the department's projected population figures. It was also noted that updated population projections and new census data would be released soon and that it was important for these to inform the final Plan.

### Part 2: Productive and innovative

The Special Activation Precincts, Regional Job Precinct and the Inland Rail were projects identified by council and stakeholder representatives as being significant to the region for economic and community benefit. The potential impact these and other major projects may have on local employment was discussed. It was felt that the precincts may either serve to improve local employment opportunities and address the skills shortage or result in an influx of temporary workers – which could further negatively impact on the current availability of housing as well as future social cohesion.

A concern across all workshop participants was the limited range of employment opportunities currently within the region and the ability to attract skilled workers to the region. Workshop participants felt that this issue is not adequately explored by land use planning and that the draft Plan is unclear about who is responsible to deliver improvements.

Stakeholders and some community participants acknowledged the opportunities for the NSW government and the region to be a leader in renewable energy production. It was also acknowledged that the mining sector will experience a transition period going forward, and the draft Plan could be more explicit about what this transition might mean for the region.

The potential impact the Special Activation Precincts, Regional Job Precinct, Inland Rail and other major construction projects may have on local employment was discussed. It was felt that the precincts may either serve to improve local employment opportunities and address the skills shortage or result in an influx of temporary workers – which could further impact the availability of housing and social cohesion.

Agriculture and primary production are still significant industries within the region and important to the local economy. Regenerative agriculture is increasingly being undertaken by agribusinesses as a more sustainable and long-term approach to farming. It was generally felt opportunities to increase regenerative agriculture could be referenced in the Plan.

### **Part 3: Sustainable and resilient**

Many of the workshop participants provided strong support for Objective 12: Protect regional biodiversity and areas of high environmental value. LALC representatives expressed support for the development of an interactive mapping tool that is easy to access (Action 9) and reiterated the importance of resourcing and staffing capacity needs to be addressed to effectively use the tools.

Submissions suggested that the final Plan incorporate a higher level of detail in considerations for biodiversity mapping, agricultural and industry supply chain routes mapping, and include better clarity in growth and change around the regional town centres.

There was a concern that issues relating to water, the resources sector and renewable energy can be divisive for local communities and that councils require the Regional Plan to provide clear and consistent messages.

### **Part 4: Housing and place**

Across all workshops, housing and housing affordability were the highest priority and the issues most discussed by participants. This was linked closely with local employment and the retention of skills within the local area.

Housing supply and affordability was a consistent theme of discussion with councils, the community and Aboriginal stakeholders. Participants across all workshops strongly supported the inclusion of a specific goal to address housing affordability in the region. Collaboration Activity 4 (establishment of a regional housing affordability round table) was supported by all participants. While many council representatives expressed interest in being involved in the roundtable, there was concern about council resourcing and a sub-regional representation approach could be considered.

While challenges relating to the availability and affordability housing in the region were noted, most participants were supportive with the direction and objectives outlined in the draft Plan relating to housing. It was discussed that due to the COVID-19 pandemic, living and working remotely from regional areas should be considered within the final Plan as it could be an important contributor to economic growth.

All councils reported that the number of major projects, while beneficial to the region, could exasperate the housing crisis. It was noted that housing demand will fluctuate due to these projects and will need to be carefully articulated in the final Plan and local housing strategies.

Workshops found that most councils have an adequate supply of zoned land for housing but the barrier to development is a lack of servicing and infrastructure provision, as well as the high cost of labour and materials.

Liveability and amenity are highly valued by the community. Consideration of green infrastructure at a regional level as well as a local level was supported by stakeholders.

### **Part 5: Connected and accessible**

Connectivity and accessibility of regional towns was greatly supported by all participants, however, some councils have noted the difficulties in implementing the desired result of *Part 5: Connected and accessible*, as many smaller rural towns have communities who do not support an increase in housing density (and resulting economies of scale) to help drive infrastructure demand.

Most participants agreed that it would be beneficial for the Plan to provide more attention and connection to Transport for NSW's regional transport plan, to increase connectivity throughout the region. Stakeholders raised issues relating to the need for resilience in the regional road networks, especially in times of disasters. It was noted this is critical to maintain important connections for emergency services and freight both within the region and outside the region, such as to the major freight hubs of Port of Newcastle and Toowoomba Wellcamp airport.

## **Other**

A common point of discussion with councils was about the implementation of the final Plan. Councils, stakeholders, Local Aboriginal Land Councils and the community all expressed significant concern with the potential impacts on resourcing within the region – both financial and expertise – required to implement the Plan. Concern from councils and Local Aboriginal Land Councils about how they would support the State Government in the implementation of new initiatives and collaboration activities outlined in the draft Plan was discussed. It was noted that there are currently several planning reforms being implemented concurrently by the State Government.

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## **Submissions received**

52 submissions were received during the exhibition period. This included 9 from councils within the New England North West region, 10 from NSW government agencies, 10 from peak bodies or industry groups, 8 from community groups and 15 from individuals. A submissions analysis is provided in Appendix 2 of this report.

# Key themes

This section discusses and responds to the key themes identified in correspondence from formal submissions and workshop discussions received by the department during public exhibition.

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## Part 1: Growth, change and opportunity

### COVID-19 impacts on population projections

Submissions noted that the most recent population projections (released in 2019) did not factor in the significant demographic changes associated with the COVID 19 pandemic and recently announced infrastructure projects.

#### Response

The final Plan has been updated with the 2022 population projections, which were released in May 2022. The projections are part of a suite of common planning assumptions used by all State agencies for planning purposes.

### New England subregion

Submissions noted that the New England and North West region functions as two distinct 'sub-regions' in terms of climate, geography and economy; and that the plan should articulate these differences.

#### Response

The final Plan has been amended to better reflect the nuances between the New England and North West sub-regions. The New England North West Regional Plan provides an overarching framework to guide subsequent and more detailed land use plans, development proposals and infrastructure funding decisions at a regional, subregional and local level. Priorities for each council are set out in Local Government Narratives, which will guide further investigations and implementation.

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## Part 2: Productive and innovative

### Special Activation Precincts

Submissions noted that the Special Activation Precincts (SAPs) were inconsistently referenced, and that the announcement of the Narrabri SAP had made some of the commentary redundant

#### Response

The final Plan has been amended to reference both the Moree and Narrabri SAP appropriately and where necessary include additional commentary on the potential benefits and outcomes from the Narrabri SAP.

## Rural land use conflict

Submissions suggested that the Plan could be strengthened to reduce the risk of inappropriate land uses potentially affecting the viability of key agricultural industries or precincts. Scattered rural dwellings have the potential to act as sensitive receptors and limit intensive agricultural or other key industries. The need to manage legacy dwelling entitlements to avoid risks to agricultural or energy industries was also raised.

### Response

Rural land in the region is primarily used for agriculture but can also contain a mix of other uses, such as rural residential development, agritourism, renewable energy infrastructure and natural resource extraction. These different land uses contribute to the character and productivity of the region, but local planning should be undertaken strategically to avoid significant impacts on agricultural viability.

The final Plan has been amended to strengthen wording associated with land use conflict. Reference to the Namoi Regional Jobs Precinct has also been adjusted and the importance of ensuring key industries can develop has been improved.

## Geotourism

Submissions requested the plan highlight the diverse and complex geology of the New England North West and that the region has recently been identified as an aspiring UNESCO Global Geopark. Submissions noted that the National Geotourism Strategy provides a framework for how geotourism can support the creation of new industries and employment opportunities

### Response

The final Plan has been amended to include guidance for strengthening and protecting natural assets and opportunities for increasing nature-based tourism in the region. Reference is made to the National Geotourism Strategy, which will support the development of major geotourism projects and leverage existing opportunities including fossicking areas, significant geological features and waterfalls.

## Mining

Submissions noted that Objective 4 is worded as 'sustainably' manage mineral resources which infers that mining – particularly coal – is an environmentally sustainable activity. There was also interest in providing greater direction around rare earth minerals, particularly as these will be required for the global transition to renewable energy sources.

### Response

Mining will play a role in the region for the foreseeable future, not only due to coal reserves but also by virtue of other minerals that will be required in new and emerging technologies. The final Plan

has been updated reflect that mining also includes rare earth minerals and direct the objective to the 'responsible' management of mineral resources. Further guidance is provided in the NSW Minerals Strategy and the NSW Critical Minerals and High-Tech Metals Strategy.

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## Part 3: Sustainable and resilient

### Water

Submissions highlighted the importance of water quality and water availability in the region. There were differing views among submissions, with some stakeholders suggesting that the availability of water in some areas was not a constraint to future growth and development, while others felt it was a major constraint to growth that needed to be acknowledged.

Climate change was acknowledged as a significant challenge for the region, particularly as the region is driven by water and water dependant industries, communities and environmental assets which are vulnerable to the impacts of climate change. Submissions also raised concern around the impact of intensive agriculture and extractive industries on water quality.

#### Response

The final Plan has been developed in consultation with key stakeholders, including state agencies. The NSW Government's regional water strategies identify that extended droughts could be more frequent than what we have previously expected, even without climate change.

### Renewable energy

Submissions highlighted issues related to potential development impacts of renewable energy projects. Submissions also highlighted the need for more community benefit from the recently declared New England Renewable Energy Zone (REZ).

#### Response

Any potential impacts from renewable energy development are assessed during the appropriate development assessment process. The New England REZ is an area identified to prioritise the co-location of renewable infrastructure to capitalise on economies of scale. It does not guarantee approval of any development and each project will need to be assessed on its own merit under the relevant legislation.

The REZ will contribute to the NSW government's goal of net zero emissions which is of national and global importance. There will also be opportunities to leverage the REZ and renewable energy investment elsewhere in the region to attract energy-intensive industries such as minerals processing, data centres, high value agriculture, manufacturing and food processing to maximise the benefits of access to lower-cost energy in the region.

To ensure that the REZ delivers meaningful, long-term benefits to local communities, EnergyCo has established the New England REZ Regional Reference Group. The Group brings together regional stakeholders that represent local councils, Aboriginal Land Councils and regional state government agencies.

## Climate change and the environment

A number of submissions highlighted the importance of lowering emissions, improving air quality, reducing waste and water usage, recycling creating a more circular economy. Submissions also highlighted the need to improve resilience and prepare for natural disasters.

Submissions raised concern over ongoing water health and quality and impacts from intensive industries and agriculture. Water supply and water saving was another key concern, with challenges to supply water for future growth under changing climate scenarios under an already constrained water supply. Objections were also raised to a number of new dams in the region.

### Response

Climate change, hazards and environmental issues have further become a key issue in the region since the last regional plan. Part 3: Sustainable and resilient of the draft Plan addresses these issues with multiple objectives, strategies and actions to adapt to climate change and natural hazards, lead renewable energy, support a circular economy, and sustainably manage and conserve water resources.

## Biodiversity

Submissions suggested the draft Plan provide additional guidance material on how to identify High Environmental Value (HEV) land. This was seen to assist Councils, consultants and proponents on the identification and mapping approach that is used to inform decisions on planning proposals.

Submissions also highlighted the importance of protecting HEV by prioritising infill development over greenfield and improving the NSW biodiversity offset policy.

### Response

Objective 12 of the Plan addresses the need to protect regional biodiversity and areas of HEV. This includes strategies to assist Council avoid HEV through strategic planning and actions to ensure that HEV data is readily available and assist councils to review their biodiversity mapping. The Plan acknowledges that well planned infill development should be prioritised to support growth.

The adequacy of biodiversity offsets in NSW is out of scope of the plan and is the responsibility of the Biodiversity Conservation Division and is legislated under the *Biodiversity Conservation Act 2016*.

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## Part 4: Housing and Place

### Housing

Submissions reported that many areas within the region are facing a housing crisis and that shortages of skilled labour contribute to a lack of new housing supply. It is considered that the challenges primarily relate to affordability and recent increases in rents and housing prices.

Submissions also called for all councils to be required to prepare local housing strategies and for the regional plan to include targets for social and affordable housing.



## Response

A Housing Affordability Roundtable will be established to address affordability challenges in the region. The final Plan has been updated to reflect that the NSW Government will implement all of the recommendations of the Regional Housing Taskforce, supported by a Regional Housing Development Program.

The Housing Affordability Roundtable may develop housing targets and/or housing targets may arise in response to the Regional Housing Taskforce recommendations. At this time, there is not sufficient evidence to implement targets and their likely impact on development feasibility in the region is not well understood.

Local housing strategies represent the best practice in local planning for housing. However, they may not be necessary where an LGA is not expected to change much over time, or where detailed strategic planning for housing is already in place. Where it is not required by a regional plan, councils can still choose to prepare a local housing strategy at any time.

## **Aboriginal engagement**

Submissions and workshops highlighted that further support is required to build partnerships between Aboriginal organisations, local and state government. Native Title groups within the region should be consulted with and addressed in the plan. Submissions requested that any mapping undertaken as a result of the Plan should be done in conjunction with Aboriginal Affairs NSW. The dual naming policy was supported in submissions and in workshops, but it was felt this required further explanation as such initiatives need to be meaningful, respectful and deliberate.

## Response

To encourage greater understanding of the aspirations of Local Aboriginal Land Council and Native Title holders, a new Strategy 16.2 has been included for councils to consider engaging Aboriginal identified staff within planning teams to facilitate strong relationship building. The delivery of the Department's Connecting with Country will provide a framework for developing connections with Country that can inform the planning, design, and delivery of built environment projects in NSW. This framework can be utilised by all levels of government and is a key action of the New England North West Regional Plan 2041.

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# **Part 5: Connected and accessible**

## **Transport**

Some submissions called for disused railways in the region to be shown on the regional plan mapping and expressed opposition to rail trails and/or support for restoring former railways. It was noted the regional plan should be closely aligned to the forthcoming regional transport plan and that concepts such as "movement and place" should be common to both plans.

Many facets of Inland Rail were raised in submissions including that the operation of Inland Rail is expected to reduce interstate rail freight demand on the east coast which will in turn enhance capacity, offering greater access to the Port of Newcastle and Port Botany from intermodal

terminals in like Werris Creek, Tamworth and (once developed) Narrabri Inland Port. Interstate access was also highlighted in submissions. Additional emerging transport technologies were also suggested including car sharing schemes, Connected and Autonomous Vehicles (CAVs), Micromobility (e.g., E-scooters, E-bikes) and On Demand Transport ([Link to Moree case study](#)).

#### Response

The infrastructure included on small scale maps in regional plans is primarily shown to illustrate what is expected to change or otherwise shape the region over time. Unless there are plans to re-use disused infrastructure, it would generally not be shown on such maps. The points about Inland Rail's far-ranging impacts are agreed and have been added to the final Plan. Similarly, the additional emerging transport technologies have been added to the Final plan.

# Next steps

The Department will strengthen governance arrangements already in place and reconvene the New England North West Coordination and Monitoring Committee to oversee and report on the implementation of the Plan's actions. The Committee will also monitor the effectiveness of the Plan's strategies in setting guidance that supports strategic planning and land use planning decisions for the region.

# Attachments

## Attachment 1 – Detailed changes made to the Plan following exhibition

Section	Changes made
Vision	<ul style="list-style-type: none"> <li>Environmental visionary text added.</li> </ul>
Vision map	<ul style="list-style-type: none"> <li>Add Health and Education icons to Gunnedah</li> <li>Add Education icon to Narrabri</li> <li>Add Pindari, Chaffey, Keepit, Split Rock and Copeton Dams</li> </ul>
Delivery framework	<ul style="list-style-type: none"> <li>No change</li> </ul>
Objective 1	<ul style="list-style-type: none"> <li>Population projections updated</li> <li>Add link to Settlement Planning Guidelines</li> </ul>
Objective 2	<ul style="list-style-type: none"> <li>Add reference to the NSW Agricultural Commissioner and their role</li> </ul>
Objective 3	<ul style="list-style-type: none"> <li>Add additional text around the importance of food processing industries to the region.</li> <li>Amend Strategy 3.2 to clarify intent to protect agricultural clusters from potential land use conflict from residential and rural-residential land.</li> <li>Amend Strategy 3.3 to include reference to Malpas Dam in Armidale</li> <li>Add local councils as partners in this activity and delete reference to structure planning.</li> </ul>
Objective 4	<ul style="list-style-type: none"> <li>Amend the title of the objective to reflect the management of mineral resources must be responsible</li> <li>Add text to clarify that mining delivers resources for technological innovation required for delivering renewable energy infrastructure.</li> <li>Clarify the roles of the NSW Minerals Strategy and the NSW Critical Minerals and High-Tech Metals Strategy.</li> <li>Amend strategy 4.3 to reflect the need to identify mine transition timelines rather than mine closures.</li> </ul>

Section	Changes made
Objective 5	<ul style="list-style-type: none"> <li>Amend Strategy 5.4 to include open space linkages as a requirement in precinct planning</li> </ul>
Objective 6	<ul style="list-style-type: none"> <li>Delete text that focusses the discussion on Moree and Tamworth and focus on the region.</li> <li>Update to reflect that the Narrabri SAP was announced in November 2021.</li> <li>Add additional dot points to Strategy 6.1 to ensure freight linkages and transport infrastructure are addressed in local plans</li> </ul>
Objective 7	<ul style="list-style-type: none"> <li>Add reference to the National Geotourism Strategy.</li> <li>Add Crown Lands as key places for the visitor economy and as a key agency in supporting the tourism industry.</li> </ul>
Objective 8	<ul style="list-style-type: none"> <li>Add reference to the Housing Recovery Taskforce for flood affected communities.</li> <li>Add consideration of flood studies and flood risk management plans to Strategy 8.4.</li> <li>Add information about the NSW 2022 Flood Inquiry</li> <li>New break out box on the <i>Western Enabling Regional Adaptation – New England North West</i> report</li> </ul>
Objective 9	<ul style="list-style-type: none"> <li>Additional text about how energy-intensive industries can maximise the benefits of access to lower-cost energy in the region</li> <li>Text added regarding the preparation of the First Nations guidelines regarding consultation and engagement in developing the Renewable Energy Zones</li> </ul>
Objective 10	<ul style="list-style-type: none"> <li>Add strategy 10.3 'Consider freight access, capacity and interface issues. Facilities will need to be located to accommodate required freight movements.'</li> </ul>
Objective 11	<ul style="list-style-type: none"> <li>Add reference to the Safe and Secure Water Program which allows Councils to develop integrated water cycle management strategies and to deliver capital projects that address risks to town water supply, water quality and the environment across the state.</li> </ul>

Section	Changes made
Objective 12	<ul style="list-style-type: none"> <li>• Deleted “At planning proposal stage, HEV land should be identified through site investigations and a suitable environmental zone applied to that land. A planning proposal should also justify the retention of an existing zone over a part of the planning area, based on the physical characteristics and biodiversity of that part of the planning area”.</li> <li>• Amended Strategy 12.1 with the following dot points: <ul style="list-style-type: none"> <li>○ focusing land-use intensification away from HEV land and implementing the ‘avoid, minimise and offset’ hierarchy in strategic plans, local environmental plans and planning proposals.</li> <li>○ updating existing biodiversity mapping with new mapping in local environmental plans where appropriate</li> <li>○ identifying HEV land within the rezoning area at planning proposal stage through site investigations</li> <li>○ applying appropriate mechanisms to protect HEV land within a rezoning area</li> <li>○ considering climate change risks to HEV land.</li> <li>○ considering riparian environments, water catchment areas and groundwater sources to avoid potential development impacts</li> </ul> </li> <li>• Expanded Strategy 12.2 to include opportunities for Aboriginal communities to participate in Biodiversity and Conservation Trust programs</li> <li>• Add the following dot point to Action 2: <ul style="list-style-type: none"> <li>○ ensure koala habitat values are included in land-use planning decisions through regional plans, local strategic planning statements and local environmental plans consistent with the NSW Koala Strategy 2022 Action 1.9. This will assist to mitigate koala habitat loss and deliver long-term habitat protections for koalas.</li> </ul> </li> </ul>
Objective 13	<ul style="list-style-type: none"> <li>• Include updated dwelling approvals data.</li> <li>• Regional Housing Taskforce textbox updated to reflect current status.</li> </ul>
Objective 14	<ul style="list-style-type: none"> <li>• Change the collaboration activity to an action, to reflect that the Department will be taking a lead role.</li> </ul>
Objective 15	<ul style="list-style-type: none"> <li>• Wording of Action 7 updated to reflect status of Connecting with Country</li> <li>• Native Title holders recognised in the Objective</li> <li>• Text amended to reference the Local Decision Making structure set out in OCHRE</li> </ul>

Section	Changes made
Objective 16	<ul style="list-style-type: none"> <li>Reference to Aboriginal Lands SEPP updated to reflect current legislation</li> <li>Strategy 16.2 added to encourage planning teams to engage Aboriginal identified staff to build strong relationships between councils and stakeholders</li> <li>Strategy 16.3 added to partner with Aboriginal communities in the development of strategic plans to align planning and community aspirations</li> </ul>
Objective 17	<ul style="list-style-type: none"> <li>No change</li> </ul>
Objective 18	<ul style="list-style-type: none"> <li>Objective title amended to include <i>inclusive</i></li> <li>Importance of shade referenced in supporting narrative</li> <li>Local example of inclusive design added (Livvi's Place Inclusive Playground Gunnedah)</li> <li>Strategies 18.1 and 18.4 reworded for clarity</li> </ul>
Objective 19	<ul style="list-style-type: none"> <li>Include the councils as partners in the collaboration activity.</li> </ul>
Objective 20	<ul style="list-style-type: none"> <li>Include mention of important east-west links.</li> <li>Update map to show additional important links and correct reference to Darling Downs.</li> </ul>
Objective 21	<ul style="list-style-type: none"> <li>Add to the list of emerging transport technologies.</li> </ul>
Objective 22	<ul style="list-style-type: none"> <li>Expand the focus of the collaboration activity from on-demand to multi modal.</li> </ul>
Local Government Narratives	<ul style="list-style-type: none"> <li>Minor changes to improve consistency and legibility</li> </ul>
Other	<ul style="list-style-type: none"> <li>Acknowledgement of Country language amended to reference that Aboriginal people were forcefully dispossessed of their land</li> </ul>

## Attachment 2 – Submission summary

Submission theme	Submission summary	Department response
<b>Air Quality</b>	<p>Recommend amendments to Objectives and Strategies to support lower emissions and enhance air quality.</p> <p>Plan should highlight the odour impacts of intensive agriculture, particularly abattoirs and poultry farms and have strategies and management techniques in place to avoid land use conflicts from development.</p>	<p>Objective 8 and Action 1 clearly details the Government’s plan to reach net zero emissions. No change to plan.</p> <p>Odour impacts are out of scope of the Regional Plan. Impacts of any new odour creating development will be dealt with under the relevant assessment process. No change to plan.</p>
<b>Noise</b>	<p>Recommend amendments to objectives and strategies to reduce noise from operational wind farms and support the expansion of the freight network.</p>	<p>Noise standards are regulated by the NSW Wind Energy Guideline and Rail Infrastructure Noise Guideline.</p> <p>Noise impacts are considered and managed during the development assessment stage. No change to Plan.</p>
<b>Circular Economy</b>	<p>Plan should aim to reduce waste, increase recycling, reduce emissions and harm to the environment and realise the environmental and economic benefits of a circular economy. The circular economy should reuse and repurpose of waste/resources such as organics and plastics.</p> <p>Improve best-practice food and garden waste management infrastructure to reduce organic waste in landfill. Critical waste and organics infrastructure should be expanded, focusing on co-locating businesses in precincts that support circular economy principles.</p>	<p>Waste and circular economy are dealt with extensively in Objective 10. No change to Plan.</p>



Submission theme	Submission summary	Department response
	<p>Include opportunities for increased organics processing capacity with agricultural by-products and waste in the agribusiness and food processing sectors.</p>	<p>Objective 3 has been amended to recognise that food processing industries may also generate opportunities for organics processing facilities to manage agricultural by-products and waste.</p>
	<p>Urban water management should include a circular economy approach where everything is reused in an efficient manner. The implementation of Integrated Water Cycle Management planning by local government has been lacking, as has funding support from state government to develop and implement the plans. These plans should be mandatory.</p>	<p>Strategy 11.2 may provide councils justification to seek funding for specific projects.</p> <p>No change to Plan.</p>
<b>Renewable Energy</b>	<p>Consider the impact of the construction, operation, decommissioning or recycling of solar and wind farm components</p> <p>The provision of biodiversity corridors and protection of habitat be a first consideration in the development of any Renewable Energy Project.</p> <p>Regional Plans should ensure community-benefit schemes are required for all renewable energy projects</p> <p>The Plan should acknowledge and fully consider the impact of construction, operation and decommissioning or recycling components of solar and wind farms, and the legacy impacts on landfill capacity of council waste management facilities</p>	<p>These issues are considered during the development assessment stage.</p> <p>No change to Plan.</p>
<b>Water</b>	<p>Concern over water health and quality including the recommendation for strategies to protect water quality from intensive agriculture and extractive industries. Strategies must include the protection of wetlands and river health by protecting natural flows through the river systems.</p>	<p>Noted. The protection of water health and quality has been extensively covered in the Plan.</p>

Submission theme	Submission summary	Department response
	<p>The Plan should recommend subsidies for water-saving devices. This would minimise costly spending on infrastructure when use of additional water-saving devices would be cheaper.</p> <p>Supply of water to the current population and industry is already a challenge. The focus on endless growth is not a sustainable direction within a constrained water supply and future climate scenarios.</p> <p>Inland rivers and groundwater sources cannot support growth in water dependent industries while also supporting growing populations under climate change scenarios. The draft plan should consider the options of a steady state and circular economy to improve the use of scarce water resources.</p>	<p>The Plan has strategies in place to encourage water efficiency.</p> <p>Noted. The Plan acknowledges the constraints water has on growth. Strategies have been included to consider supply issues; manage constraints; encourage the reuse of water; adopt an integrated approach to the water cycle and investigate options for water management through innovation.</p>
	<p>The draft plan fails to recognise the significance of the Gwydir wetlands or include strategies for their protection. The increasing reliance on held environmental water released from water storages to provide all environmental needs is inappropriate. A strategy is needed in the draft plan to protect wetlands and river health.</p>	<p>Noted. The protection of water health and quality has been extensively covered in the Plan.</p>
	<p>The plans should commit to no new or enlarged instream water storages in the region.</p> <p>Objection has been raised to the construction of a larger Dungowan Dam on the Peel River, a new dam at Gravesend and enlarged Tareelaroi reregulating weir on the Gwydir River, a new large dam on Mole River, enlarging Pindari Dam or raising Mungindi Weir. These are inappropriate infrastructure projects that will impact on river health.</p>	<p>No change to Plan.</p> <p>Planning issues are assessed during the development assessment process. The project requires approval under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth) (EPBC Act) and is being assessed under the Bilateral agreement made under the section 45 of the EPBC Act relating to environmental assessment between Commonwealth of Australia and The State of New South Wales (Bilateral Agreement).</p>

Submission theme	Submission summary	Department response
<b>Resources</b>	<p>Consider the need to minimise the risk of resource extraction impacting on residential and agricultural land use.</p> <p>Logging of State Forests should cease immediately, and damaged areas should be remediated.</p>	<p>Noted. Land use conflict is a key element of the development assessment process. Logging is an issue for the Department of Primary Industries and is outside of the scope of the Plan.</p>
<b>Agriculture</b>	<p>The Plan should provide guidance for managing land use conflicts between agriculture and housing.</p>	<p>Noted. An agricultural land use planning strategy is being considered by NSW Government in consultation with the NSW Agricultural Commissioner. Implementation is being considered by Department of Primary Industries.</p>
<b>Environment</b>	<p>The Vision should include more on emissions reduction and climate change.</p>	<p>The Vision has been updated to strengthen focus on reducing emissions and mitigating climate change.</p>
	<p>The draft Plan does not recognise the environmental assets of the region including major river systems and the Ramsar listed Gwydir Wetlands.</p>	<p>The Department has strategies in place to appropriately protect, maintain and restore important environmental assets in strategic planning and local plans.</p>
	<p>Local government play a fundamental role to achieve net zero emissions</p>	<p>Several minor changes have been made to the document to address concerns over climate change and water availability including local government's key role in the shift to net zero emissions.</p>

Submission theme	Submission summary	Department response
	<p>The <i>Western Enabling Regional Adaptation - New England North West</i> report addresses adaptation pathways for agriculture which should be referenced, including ensuring that local planning measures support: gradual change to crop/pasture varieties; of the development of locally grown products and regional markets; regionally specific climate adaptation integrated into disaster management and whole farm planning; adoption of animal welfare practices to manage natural disasters and increased predator and disease load; and integration of carbon farming to diversify farm incomes.</p>	<p>Agreed. Objective 11 has been amended.</p>
	<p>The Plan should highlight the importance of protecting High Environmental Value land. Infill development should be prioritised over greenfield development.</p>	<p>Noted. The Department agrees that infill development should be prioritised over greenfield development where possible.</p>
	<p>Biodiversity offsetting in NSW has failed to meet its intended outcomes. Financial incentives including tax breaks should be offered to encourage support for the Biodiversity Conservation Trust.</p>	<p>Noted. Council resourcing and biodiversity offsetting is out of scope of the Plan.</p>
<p><b>Hazards</b></p>	<p>Plan should review progress on research into “improving capabilities for immediate detection of new ignitions, especially in remote areas, and fast responses to keep new fires small”, and what further research is required to make this a viable and effective strategy.</p>	<p>Out of scope. No change to Plan.</p>

Submission theme	Submission summary	Department response
<b>Health</b>	<p>The current shortage of GPs and other medical professionals in Armidale and elsewhere is likely to contribute to reduction in life expectancy.</p> <p>The Plan should note that active transport also generates substantial health benefits. The Plan should recommend including the health benefits of promoting cycling and walking in all benefit-cost analyses to justify new and improved facilities to encourage active transport.</p>	<p>The provision of medical facilities and staff is managed by Health NSW, and therefore out of scope.</p> <p>No change to Plan.</p>
<b>Housing</b>	<p>Solutions are needed to housing crisis of rising rents, house prices, and homelessness. Difficulty in generating new housing supply to cope with rising demand.</p>	<p>Noted.</p> <p>Collaboration Activity 4 seeks to establish a housing affordability roundtable to bring together stakeholders to devise measures to improve affordability in the region. The Regional Housing Taskforce recommendations include wide ranging actions to improve housing affordability and supply in the region.</p>
<b>Transport</b>	<p>Benefits of Inland Rail as the biggest new infrastructure project need to be captured and spread across the region.</p>	<p>Agreed. Text has been added to build on the railway as a catalyst for development inside and further from the Special Activation Precincts.</p>
<b>Population projections</b>	<p>The draft plan uses population projections that were developed prior to the COVID-19 pandemic and are therefore unreliable.</p>	<p>Agree that the projections did not foresee the pandemic and its impacts on demography.</p> <p>The final Plan utilises the most current projections available.</p>

Submission theme	Submission summary	Department response
<b>Public space</b>	The <i>NSW Everyone Can Play</i> Guideline is an important resource for inclusive design for local government and planners and should be included in Objective 18.	Supporting text in Objective 18 has been added to reference the <i>NSW Everyone Can Play</i> guideline and highlight Livvi's Place Inclusive Playground in Gunnedah.
	The Plan needs to reference the role that natural and built shade has in urban cooling and protecting residents and visitors of the risks of UV exposure. This can be done by amending the text and strategies in Objective 18 and Strategy 5.4.	Supporting text has been added to Objective 18 to reference shade. Strategy 18.4 has also been amended to specifically reference the provision of shade in playgrounds, sports and recreation facilities and public spaces.
	References to Minister for Planning and Public Spaces to be updated due to Machinery of Government changes in 2021. Other minor changes to policy titles such as the <i>NSW Public Spaces Charter</i> .	Relevant updates made throughout document.
	Strategic plans should consider opportunities to increase urban tree cover, street tree plantings.	Noted. Strategy 18.4 has been updated to encourage strategic plans to increase urban tree cover and now provides specific guidance.
<b>Aboriginal planning matters</b>	In NSW, all consideration of Aboriginal Cultural Heritage is considered through Heritage NSW and any new mapping must integrate with the current system. When mapping LALC land holdings, equal consideration must be given to mapping Native Title claims.	Noted for implementation of the Plan.

Submission theme	Submission summary	Department response
	<p>Aboriginal cultural heritage does not appear to be appropriately addressed in the identified actions or strategies.</p>	<p>Noted. The delivery of Connecting with Country will provide a framework for developing connections with Country.</p> <p>It is anticipated that the addition of Strategy 16.2 can assist local councils to partner with Aboriginal communities and organisations to better understand Aboriginal cultural heritage.</p>
	<p>Further consultation with Aboriginal people, communities and Native Title holders is required in the development of the plan. Close working relationships between local and state government and local Aboriginal people are needed to build a shared understanding of the urban environment.</p>	<p>Noted. Strategies 16.2 and 16.3 have been added to foster strong relationships between Aboriginal communities, organisations, local councils and state agencies across the region.</p>
	<p>The draft Plan needs to reference the guidelines for increasing First Nations income and employment opportunities from electricity infrastructure projects and the aspirations of each Local Aboriginal Land Council from their Community Land and Business Plan. The draft Plan should also mention the Local Decision-Making structure set out in OCHRE. The plan should also align with Closing the Gap programs for Aboriginal communities.</p>	<p>Objective 9 updated to reference the First Nations guidelines, which are currently in preparation.</p> <p>Closing the Gap and supporting the aspirations detailed in Community Land and Business Plans is referenced in Objective 16. No change made.</p> <p>The Local Decision Making structure has been referenced in Objective 15.</p>
	<p>Consider inclusion of reference to Gomeroi/Gamilaroi nation as opposed to reference to Kamilaroi as these descriptions are more widely used by community.</p>	<p>Noted. The development of the Plan was informed by <i>Policy guidelines for the recording and use of Aboriginal and Torres Strait Islander Place Names</i>.</p>

Submission theme	Submission summary	Department response
	<p>Aboriginal communities, Local Aboriginal Land Councils and Native Title groups should have clear opportunities and adequate resourcing to inform land use decisions and resources properly to manage and develop land. The Regional Plan actions could be strengthened to ensure local and state governments give wider consideration and inclusion of Aboriginal matters and people in land use planning and assessment.</p> <p>Ongoing training should include traineeships and vocational education pathways to enable LALCs to have town planners on staff.</p>	<p>Noted. The Plan is unable to allocate additional funding to Local Aboriginal Land Councils.</p>
	<p>The dual naming policy is supported, however further information is required as initiatives such as the dual naming policy need to be meaningful, respectful and deliberate.</p>	<p>Noted. Internal consultation underway to inform implementation.</p>
<p><b>Local Government narratives</b></p>	<p>The Local Government narratives should be rewritten as they are bland and do not showcase the uniqueness of each local government area. The two Joint Organisations of Councils and Local Aboriginal Land Councils should also have narratives at the end of the document.</p>	<p>All councils provided input to the review and update of the Local Government Narratives in the New England North West Regional Plan 2036. Some narratives have been amended following further consultation with councils.</p> <p>Local Aboriginal Land Councils and Joint Organisations of Councils are recognised as collaboration partners, where appropriate, throughout the plan.</p>
<p><b>Implementation</b></p>	<p>Targets, strategies and intended outcomes need to be clearly identified on how DPE are progressing with identified Actions, such as the development of Connecting with Country.</p>	<p>The plan to achieve actions and collaboration activities is included in the accompanying Implementation Plan 2022-24.</p>



Submission theme	Submission summary	Department response
	<p>The NENW Plan should note the hold-ups caused by current financial difficulties including increased cost-shifting and other burdens placed on local councils and aim to provide additional planning and other resources as part of the Implementation Plan.</p>	<p>Noted. The Regional Plan is unable to allocate additional funding to Councils</p>