
Department of Planning and Environment

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Submission summary and engagement report

North Coast Regional Plan 2041

December 2022





Acknowledgement of Country

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

Published by NSW Department of Planning and Environment

planning.nsw.gov.au

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First published: December 2022

Department reference number: EF22/13737

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Summary

This report summarises the review process and key changes made following the exhibition period for the draft North Coast Regional Plan 2041 (the Plan). The Plan was exhibited between 11 July – 24 August 2022 and 178 submissions were received.

The exhibition period included a series of online workshops for key stakeholder groups, an online interactive platform and a dedicated, face to face First Nations engagement stream, the first of its kind for Regional Planning in NSW.

Key outcomes from the consultation period:

- The proposed Urban Development Program with an initial 4 council roll-out has been changed to the North Coast Urban Housing Monitoring Program that will cover all 12 LGAs and better reflect local priorities
- Content relating to the investigation of potential biomass sources in the North Coast region was removed from the Plan
- The text supporting each Objective was rationalised. This has resulted in a shorter and more user-friendly document

This consultation report accompanies the final North Coast Regional Plan 2041.

Introduction

In 2017, the Department of Planning and Environment released the North Coast Regional Plan 2036, one of nine regional plans in NSW. It establishes a vision and direction for strategic land use planning and addresses the North Coast 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, resilience and First Nations perspectives.

The North Coast Regional Plan 2041 applies to the 12 local government areas of Ballina, Bellingen, Byron, Clarence Valley, Coffs Harbour, Kempsey, Kyogle, Lismore, Nambucca, Port Macquarie-Hastings, Richmond Valley and Tweed.

Throughout 2022, the NSW Government consulted with councils, agencies, the community and other stakeholders including a dedicated First Nations engagement program, 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 North Coast region.

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 North Coast Regional Plan 2041.

Review process

The review of the Plan occurred in five stages.



Stage 1 – Research and engagement

Review of the North Coast Regional Plan 2036 commenced with early engagement of councils and relevant agencies, including a survey and online briefings. The survey aimed to understand the strengths and weaknesses of the plan to inform how it could be improved in the second iteration.

An evidence base was formed through a review of councils' Local Strategic Planning Statements, key NSW Government policies and the commissioning of consultants to complete the following tasks:

- A gap analysis and desktop review of North Coast Regional Plan 2036;
- A review of urban growth area mapping; and
- A small group of First Nations stakeholders across a range of industries and geographic locations were consulted, to ensure a cross-section of the Aboriginal communities across the North Coast. Outcomes of this engagement and a literature review were used to inform the draft NCRP.

Stage 2 – Drafting

Drafting occurred from January – June 2022. Briefings were undertaken with the North Coast Delivery, Coordination and Monitoring Committee, with membership including representatives from key NSW state government agencies and the Northern Rivers and Mid North Coast Joint Organisation of Councils.

Targeted workshops were held with planning staff from each council to inform the preparation of the local government narratives.

Stage 3 – Exhibition

A formal exhibition period ran from 11 July to 24 August 2022. Exhibition was managed through a central online exhibition hub and submissions were accepted through the NSW Planning Portal. Community, council, agency, key stakeholder and First Nations workshops ran throughout the exhibition period and facilitated by consultation experts. The engagement section of this report details the schedule and outcome of exhibition activities.

Stage 4 – Consideration of submissions and plan refinement

A total of 178 submissions were received during the exhibition. The submissions and outcomes of the exhibition activities were carefully considered by the department between August and October 2022 to develop a final North Coast Regional Plan 2041.

Stage 5 – Release of final Plan

The final North Coast Regional Plan 2041 and accompanying Implementation Plan and Consultation Summary was released by the Minister for Planning and Homes on 7 December 2022. The North Coast Delivery, Coordination and Monitoring Committee will oversee the implementation of the Plan. See the Implementation Plan for further information.

North Coast Regional Plan vision and map

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

The North Coast Regional Plan area map (Figure 1) illustrates the area the Plan applies to.



Figure 1: Map of the North Coast region

Engagement

Overview of engagement program

The draft North Coast Regional Plan was on public exhibition from 11 July to 24 August 2022. Draft regional plans are exhibited for a minimum of 45 days, as required by the Environmental Planning and Assessment Act 1979.

A NSW Government online engagement hub was established for the community to be informed and share thoughts on 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 key stakeholders and registered subscribers
- A paid social campaign leveraging DPE social media channels
- Paid advertising and marketing with the aim of raising awareness of the exhibition period
- Media outreach targeting local outlets.

Workshops were facilitated for councils, agencies, whole of community and First Nations community.

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	11 July – 24 August 2022	3,910 visitors 178 submissions
Councils Directors' briefing	12 July 2022, online	11 attendees
8 First Nations community workshops	13 July – 12 September	34 attendees
State agencies workshop	27 July 2022, online	24 attendees
2 Council workshops	27-28 July 2022, online	29 attendees
3 Community workshops	28 July – 11 August 2022, online	41 attendees
8 Key stakeholder interviews	2-16 August 2022, online	25 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 an interactive Ideas Wall.

The Ideas Wall provided representation of the plan as a series of 9 visual 'tiles' grouped by colour, with each colour representing the three goals of the draft plan. Each tile represented a key theme to achieve the goals and on each, users were able to leave a comment in a discussion thread or 'like' or 'dislike'.

The Ideas Wall generated 71 comments with the themes relating to Goal 1: Liveable, sustainable and resilient and Goal 3: Growth, change and opportunity, generating the most discussion by site visitors.

By the numbers:

- Total visits to page (counts people returning to page multiple times): 10,686
- Unique visits (counts people once, no matter how many times they have visited page) 3,910
- Ideas Wall comments: 71
- Document downloads: 728

Workshops

Workshops were a key part to the overall engagement for the draft Plan and were promoted on the draft North Coast Regional Plan 2041 website. To maximise engagement, five different types of workshops were facilitated:

- Community workshops, facilitated by the Planning Studio
- Key stakeholder focus groups, facilitated by the Planning Studio
- Agency briefing, facilitated by the Department
- Council workshops, facilitated by the Department
- First Nations workshops, facilitated by Zion Engagement and Planning

From across the North Coast, 130 people participated in the briefings and workshops delivered from 12 July to 16 August 2022. At all workshops facilitated by external consultants, 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 a final 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 North Coast 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.

An outcomes and recommendations report was submitted to the Department and was a key input to the finalisation of the Plan.

To ensure the final Plan represented a strong, respectful and accurate First Nations voice, a dedicated stream of engagement was facilitated by a local First Nations organisation. Seven face to face workshops occurred across the region (Tweed Heads, Ballina, Casino, Grafton, Coffs Harbour, Kempsey and Port Macquarie) and one online. Each workshop had a member of the drafting team present. An outcomes and recommendations report was submitted to the Department and was a key input to the finalisation of the Plan. This process is the first of its kind for Regional Planning in NSW.

Dedicated Aboriginal stakeholder engagement

The Department partnered with Zion Engagement and Planning to facilitate a series of half day, location-based workshops across the region inviting key stakeholders to participate in inclusive workshops addressing the holistic needs of communities in the regional context.

Stakeholders included Traditional Custodians, Native Title groups, Local Aboriginal Land Councils, peak Aboriginal organisations in health, housing, education, transport, employment and community services and community members. The North Coast nations of Bundjalung, Gumbaynggirr, Dunghutti, Birpai, Yaegl and Githabul were all represented throughout this process. The format of the workshops included:

- An overview of the regional plan and regional planning process
- A summary of the key changes to the plan since 2017
- A focus on Objective 4: Understand, celebrate and integrate Aboriginal culture and Objective 13: Champion Aboriginal self determination
- Community prioritisation exercise and final discussion

Key stakeholder focus groups

In addition to the open community workshops, targeted in-depth conversations with key stakeholders were conducted to inform the finalisation of the Plan. The stakeholders were grouped into themes:

- Local planning and design professional and peak body representatives
- Business, and tourism organisations, including local government staff
- Universities across the region and South-East Queensland
- Creative and cultural organisations, local government cultural officers and practitioners
- Gold Coast City Council and the Office of the NSW Cross-Border Commissioner

Workshop findings

Workshop attendees were generally supportive of the draft Plan and its revised objectives. The following section summarises the key areas of discussion under each part of the draft Plan.

Goal 1: Liveable and resilient

- Housing availability and housing affordability was a consistent theme throughout the workshops. The region may be experiencing flow on effects from a lack of appropriate housing options, including regional labour shortages. There is a lack of opportunities for Aboriginal people to live on Country.

- There may be a lack of infrastructure and services to support the increasing population and ongoing residential development occurring across the region. Until this is delivered, the Plan could reduce growth areas to limit development or a more balanced approach.
- Enhancing the natural environmental assets, biodiversity and habitats and provide adequate protection areas against flooding and bushfire is a priority. Habitat loss due to development pressure is also a concern for communities

Goal 2: Productive and connected

- Connected, public and active transport infrastructure across the region is important to increase mobility and accessibility across the region. Consideration for how these networks can be more resilient in times of natural disasters was also front of mind.

Goal 3: Planning for communities

- Aboriginal communities want to work in partnership with DPE and Councils in land use planning to protect Country and access Country for cultural practice
- Despite the importance of cultural and creative industries and activities to the region, the draft Plan provided limited commentary and actions to support and grow the opportunities that these industries offer. It was noted that there is currently a lack of cultural infrastructure across the region which is not addressed in the draft Plan.
- Greater recognition of the role that smaller centres play in the region. It was acknowledged that while the strategic regional cities and centres are important, the smaller centres are critical to the future growth of the region, and this could be better reflected in the final Region Plan.

Other

- The draft Plan and its revised directions were generally supported across all workshops.
- Many participants asked about the 2022 Flood Inquiry and the expected outcomes and recommendations. DPE staff noted that the final Plan will respond to the recommendations of the Inquiry once reviewed and endorsed by NSW Government.

Submissions received

A total of 178 submissions were received during the exhibition period. This included 14 from councils within the North Coast region, 13 from NSW government agencies, 26 from peak bodies or industry groups, 24 from community groups and 101 from individuals. A comprehensive 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 the public exhibition period.

Goal 1: Liveable and resilient

Housing

There was broad support for the proposed Housing Affordability Roundtables and suggestions about membership of the group. Some submissions called for housing targets, including overall LGA based targets, and social and affordable housing targets. Some submissions mistakenly interpreted the population and dwelling projections to be housing targets. There was general support for the establishment of an urban development program in the region but also questions about the details of how and where it would operate. Matters related to the Housing SEPP, including concerns about short term rental accommodation, caravan parks, and manufactured home estates were raised, along with calls for restrictions and amendments to the planning system. A number of submissions raised the issue of land banking and asked for the planning system to disincentivise it.

Response

The Housing Affordability Roundtables will be established at an early stage within the 5-year implementation of the Regional Plan. Local government will be represented, as will community housing providers, State agencies and the housing development industry. Unlike the affordable housing roundtable operating in the Illawarra Shoalhaven Region, the focus on the North Coast will be the broader concern of housing affordability.

For the avoidance of doubt, population projections are not housing targets. The North Coast Regional Plan includes a 40% multi-dwelling / small lot housing target but does not include LGA based overall housing number targets. Housing targets for the North Coast may arise separately from Regional Housing Taskforce implementation activities or through Council's Local Housing Strategies. Setting targets for serviced land was also mooted in the draft Plan in association with the Urban Development Program. Given the potential to impact development feasibility, and the lack of an evidence base, affordable housing targets are not included in the Regional Plan.

An Urban Housing Monitoring Program will be established for the entire North Coast region. The program will be similar to UDPs in other regions but will be developed to reflect local conditions and priorities.

Some housing policy issues, while relevant to the North Coast, are not within the purview of a regional plan and are instead Housing SEPP issues. DPE is currently separately reviewing the Housing SEPP provisions relating to group homes, supportive accommodation, caravan parks, affordable housing and manufactured home estates. Continued monitoring of the operation of the SEPP will also occur to identify necessary changes to support the delivery of diverse and affordable housing and ensure the new and amended provisions are functioning as

intended. The NSW Government has implemented a state-wide regulatory framework for short-term rental accommodation (STRA), which includes:

- a planning framework
- fire safety standards for STRA dwellings
- a government-run STRA Register.

The planning framework came into effect on 1 November 2021.

Various views on land banking were raised in submissions. Land banking is a subjective concept and is outside the influence of regional plans. Nevertheless, it was considered by the Regional Housing Taskforce. The Government response to the Taskforce noted it will investigate mechanisms to incentivise the development of residential zoned land to address land banking and assist the timely release of new housing supply.

Opposition to over-development

Many submissions raised opposition to perceived overdevelopment which has occurred at specific areas of the North Coast region.

Response

Perceptions of whether an area is over or under-developed are subjective and vary widely throughout the community and across time. The Plan seeks to align growth with infrastructure and sets out Settlement Planning Guidelines which directs growth to identified urban growth areas and promotes sustainable development within the coastal strip. No change has been made to the Plan.

Environmental protection

Submissions supported the plan's environmental objectives in particular renewable energy initiatives and promoting the circular economy. However, submissions raised that the Plan did not have enough focus on and Actions relating to protecting the natural environment, water, climate change and hazards.

Response

The plan has several dedicated objectives, actions and strategies to providing a land use planning response to improving environmental issues. The plan needs to balance economic, social and environmental issues so therefore cannot have a purely environmental focus. However, the plan has strengthened its position on protecting the environment and resilience and natural hazards through a number of strategies, actions and collaboration activities.

Objective 3 has a number of strategies, actions, and collaboration activities to help protect and enhance environmental assets. The plan was prepared in consultation with other agencies including the Biodiversity Conservation Division of the Department. A number of amendments were made as a result of this process to further strengthen environmental outcomes particularly around biodiversity and strategies to protect koalas.

Objective 5 of the plan sets out a number of strategies to mitigate the impact and reduce exposure from natural hazards and to adapt to climate change. Among others this includes strategies for strategic plans and local plans to update flood studies and management plans, and to locate development away from areas with known hazard risks. The plan is consistent with the recommendations from the expert inquiry into the preparation for, causes

of, response to and recovery from the 2022 catastrophic flood event across NSW and consultation was undertaken with the Northern Rivers Reconstruction Corporation. Furthermore, the Governments' State-wide Natural Hazards Package guides how natural hazard risk is considered in local land use planning.

The plan has been developed in consultation with the relevant water agencies. A number of strategies are in place in both Objective 3 in regard to water quality, Objective 5 in relation to hazards and resilience and Objective 9 in terms of quality, supply and availability. The plan is consistent with the relevant Water Strategies for the region.

Bioenergy fuel to waste

Circular Economy was generally a supported objective for the plan to pursue. However, a number of submissions objected to fuel to waste bioenergy projects on environmental grounds such as emissions.

Response

Bioenergy would use waste products which would otherwise be discarded to create energy and support other types of energy generation.

The regional plan promotes the use of biomass sourced from wastes and by-products. Local sustainable biomass does not include clearing of native habitat. The technologies to combat emissions from burning will be assessed during the relevant assessment stage of any project.

Despite this, Collaboration Activity 2 which aimed to source affordable biomass from these sustainable sources has been removed as this is the sole responsibility of Department of Regional NSW. The NSW Government's Biomass for Bioenergy Project is part of the NSW Climate Change Fund which will continue irrespective of the Collaboration Activity.

Outcome of the NSW Independent Inquiry into Flooding 2022

Submissions raised that finalisation of the Plan should be withheld until the NSW Government had responded to the NSW Inquiry into Flooding and that the exhibition timeframe should be extended to allow councils and community to comment on the plan.

Response

The Plan was exhibited for 45 days as required by the Environmental Planning and Assessment Act 1979. Various government agencies including the Northern Rivers Reconstruction Corporation provided input into the draft and final plan. Objective 5: Manage and improve resilience to shocks and stresses, natural hazards and climate change has been updated and confirms the NSW Government has supported, either in full or in principle, all the recommendations of the 2022 NSW Independent Flood Inquiry. The Department will continue to work with councils to determine how the planning for hazards, including flooding, will inform the planning process.

Farmland

Submissions raised the need to ensure important agricultural land is protected from incompatible land uses and that the terms State significant and regionally significant farmland are included in the plan.

Submissions also objected to the limitation of dwellings on rural land as they can provide flexibility for landowners in relation to succession planning, ageing in place and financial viability of farming enterprises.

Response

‘Important farmland’ is the broad term that links to the NSW Government’s Important Farmland mapping and a consistent term with the previous Regional Plan. The Department of Primary Industries has confirmed it has no objection to the term important farmland or its inclusion in the plan.

Additional dwellings on properties on the North Coast (Dual Occupancy – attached and detached, secondary dwelling and rural workers dwellings) are permissible in rural zones in many LGAs of the region. Councils are responsible for determining appropriate land uses in the rural zones through their local strategic planning framework. Dwellings in rural zones are often receptors for varying land use conflicts with agricultural uses particularly when that are not ancillary to farming operations. The intent of Objective 8 is to ensure potential land use conflicts are addressed prior to additional dwellings being approved by Council. It does not require prohibition of additional dwellings in appropriate circumstances.

Goal 2: Productive and connected

Aboriginal self-determination through the planning system

Submissions from the community and councils supported the Plan’s focus on First Nations planning and representation. Some submissions felt the language around the strategies in Objective 4: Understand, celebrate and integrate Aboriginal culture could be stronger to effectively compel councils to implement the strategies. Objectives 4.1 and 4.2 were strongly supported, provided these projects were led by local Aboriginal communities and done appropriately. Cultural heritage mapping should be accompanied by a cultural heritage management plan.

Response

While the intention of Objective 4 remains unchanged, wording in the narrative has been updated to reflect the outcome of submissions and the final report from the dedicated First Nations stream. Key changes include an update to Strategy 4.2 and narrative to encourage the preparation of a cultural heritage management plan to accompany any mapping. The draft action to Complete the Connecting with Country framework has been removed from the Plan as this program is expected to be delivered by the Department imminently

Transport

There were calls to reinstate trains on various railways or sections of disused rail. Some submissions proposed routes or stops for a future fast rail network in the North Coast. Emerging transport technologies were identified as needing consideration in the Plan. Amendments to ensure the Regional Plan is closely aligned with Transport for NSW activities and plans were also proposed.

Response

Reinstating rail services and a future fast rail network are matters for TfNSW. Close consultation with TfNSW has occurred throughout drafting of the Regional Plan to ensure alignment with TfNSW priorities. Feedback from the consultation process will also be provided to TfNSW to help inform their future their future planning processes.

Goal 3: Planning for communities

Public space includes cultural infrastructure

The Plan does not discuss cultural infrastructure. Public spaces should include multipurpose facilities. The inclusion of demographic information in Objective 19: Public spaces and green infrastructure support connected and healthy communities is confusing.

Response

Culture infrastructure has been addressed in Objective 19, including the expansion of Strategy 19.1 for public space strategies to consider addressing bespoke cultural infrastructure in partnership with the community. Demographic and climactic data has been removed from this Objective 19 as it has been addressed elsewhere in the plan.

Appendices

Settlement Planning Guidelines

The Plan does not identify how urban growth area boundaries are amended or changed.

Response

The Settlement Planning Guidelines were amended to clarify that change to add or remove land from an urban growth area is to be undertaken firstly as part of a local land use strategy or planning work by Council, in consultation with the local community. Once adopted by the Council and approved by the Department, the amendment will be reflected in the next review of the regional plan.

Other

Structure of the plan

Some submissions raised confusion with the format of the plan, specifically the delineation between goals, parts and objectives as these terms were not explained in the plan.

Response

'Parts' have been removed from the plan to simplify the structure, and 'goals' retained. The background and supporting information in the plan has been rationalised. Where possible, background information has been

removed where the intent of the Objectives, strategies and actions remain unchanged. Background information will also remain available for future reference in the draft plan that was exhibited.

Resourcing requirements

Funding and resourcing are required to implement the directions within the Plan.

Response

Actions and Collaboration Activities are generally funded by the Department of Planning and Environment or other agencies. Grant funding for the implementation of strategies or to assist with existing resourcing constraints is out of scope.

Next steps

The NSW Government will strengthen governance arrangements already in place and continue to convene the North Coast 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"> Minor text edits
Vision map	<ul style="list-style-type: none"> Minor amendment to add Ocean Shores as a centre
Objective 1	<ul style="list-style-type: none"> Changed the Urban Development Program with an initial four council roll-out, to the North Coast Urban Housing Monitoring Program that will cover all LGAs and better reflect local priorities. Clarified that councils can plan for caravan parks and manufactured home estates as part of the housing mix. Aligned seasonal and itinerant worker action with implementation of the corresponding Regional Housing Taskforce recommendation.
Objective 2	<ul style="list-style-type: none"> Minor text edits.
Objective 3	<ul style="list-style-type: none"> Collaboration Activity added outlining work NSW Biodiversity and Conservation Division will undertake with councils
Objective 4	<ul style="list-style-type: none"> Wording updated throughout the Objective to be more consistent with Aboriginal community representation as understood throughout the Aboriginal stakeholder engagement program Expanded strategy for councils to undertake a cultural heritage management plan to accompany any cultural heritage mapping Action for the Department to finalise the <i>Connecting with Country</i> framework removed. This will be completed by the Department imminently and does not warrant inclusion as an action
Objective 5	<ul style="list-style-type: none"> '2022 NSW Flood Inquiry' and 'Northern Rivers Reconstruction and Adaptation' guidance added Strategies enhanced. Strategy 5.5 identifying Coastal Vulnerability Areas deleted as already adequately addressed under Strategies 5.3 and 5.4

Section	Changes made
Objective 6	<ul style="list-style-type: none"> Case Study added – Waste Reduction Byron Bay
Objective 7	<ul style="list-style-type: none"> Strategy 7.1, Strategy 7.3 and Collaboration Activity 2 removed. Strategy 7.1 adequately addressed by Strategy 7.2. Removed Strategy 7.3 and Collaboration Activity 2 as unclear how to implement through a land use plan
Objective 8	<ul style="list-style-type: none"> Strategy 8.2 removed as unclear how to implement through a land use plan
Objective 9	<ul style="list-style-type: none"> Minor text edits
Objective 10	<ul style="list-style-type: none"> Minor text edits
Objective 11	<ul style="list-style-type: none"> Strategy 11.4 removed as adequately addressed in s9.1 Direction 7.1
Objective 12	<ul style="list-style-type: none"> Minor text edits
Objective 13	<ul style="list-style-type: none"> Wording updated throughout the Objective to be more consistent with Aboriginal community representation as understood throughout the Aboriginal stakeholder engagement program Strategy 13.5 added encouraging councils to establish a formal relationship with locally recognised Aboriginal organisations and community to promote partnerships Action 5 amended to focus on the Department working with LALCs and Native Title holders to utilise the planning system to achieve aspirations, instead of exhibited action to reflect stakeholder aspirations in plans.
Objective 14	<ul style="list-style-type: none"> Minor text edits
Objective 15	<ul style="list-style-type: none"> Amended Collaboration Activity 5 to be about multimodal transport. Minor text edits
Objective 16	<ul style="list-style-type: none"> Added end of trip facilities as a strategy to encourage active and public transport. Action 7 (provide guidance on the preparation of Active Travel strategy) removed
Objective 17	<ul style="list-style-type: none"> Amended Collaboration Activity 7 to include broader focus on public transport. Removed Collaboration Activity 6 as is a matter to be delivered by TfNSW.

Section	Changes made
Objective 18	<ul style="list-style-type: none"> • Clarified process to amend urban growth areas. • Additional subregional planning principle added to encourage councils to work together when considering opportunities and need for new release areas. • Northern Rivers subregional map amended to more clearly show significant road connections to and from Casino
Objective 19	<ul style="list-style-type: none"> • Cultural infrastructure addressed in Objective and added to Strategy 19.1 • Minor text edits
Objective 20	<ul style="list-style-type: none"> • No change
Local Government Narratives	<ul style="list-style-type: none"> • Minor wording changes in consultation with councils in response to submissions. • Updated UGA mapping in consultation with councils in response to submissions.
Appendix A – Settlement Planning Guidelines	<ul style="list-style-type: none"> • Minor wording changes in response to submissions review.
Appendix B – Urban Growth Area Variation Principles	<ul style="list-style-type: none"> • Minor wording changes in response to submissions review.
Other	<ul style="list-style-type: none"> • ‘Parts’ removed from structure and some ‘Goals’ renamed for clarity • Background information rationalised throughout • Flooding feature removed from introductory section • Glossary updated with new and amended definitions

Attachment 2 – Submission summary

Submission theme	Submission summary	Department response
Miscellaneous	The document is long and as a result lacks some usability. The hierarchy of the plan was hard to follow as ‘parts’ and ‘goals’ were not defined.	Where appropriate, background information or references to other policies has been removed from the document. The term ‘Parts’ has been removed.
	Population projections should include the latest census details. Multiple submissions stating the projections are inconsistent with other jurisdictions.	Population projections are developed using a range of best practice industry methods. Data from the Australian Bureau of Statistics and other agencies are used in the preparation of the projections
First Nations planning	<p>Aboriginal communities want to work in partnership with the state government and councils in land use planning to protect Country (including water) and access Country for cultural practice.</p> <p>Engagement with Aboriginal communities on development and land use issues needs to be inclusive of community and reflective of cultural governance structure.</p>	<p>Strong partnerships between Aboriginal communities and councils is identified as a key opportunity throughout the plan. The exhibited text has been strengthened with additions to the narrative in Objective 13 and the addition of Strategy 13.5.</p> <p>The focus of Action 6 to ensure Aboriginal community voice is reflected in strategic and local plans has been expanded to now included partnering with stakeholders to utilise the NSW planning system to achieve land use aspirations. Cultural awareness/cultural immersion training has been removed from Action 6 and included in the Objective narrative.</p>
	First Nations people should be employed in all areas of planning including conservation and land management. All levels of government should have employment targets that are consistent with the percentage of Aboriginal people in that area.	Strategy 13.4 encourages councils to partner with local Aboriginal communities, including through an identified position within planning teams. Setting mandates for staffing is outside the scope of the regional plan. No change made to plan.

Submission theme	Submission summary	Department response
	<p>Along with LALC and Native Title holder representation, community recognised Aboriginal organisations should be identified as key stakeholders in the planning system.</p>	<p>Community recognised Aboriginal organisations have now been added as key stakeholders to Strategy 13.1 and Strategy 13.5. Objective 13 narrative has also been updated to reflect this.</p>
	<p>There is a critical lack of Aboriginal housing across the region. Prioritisation of resourcing is required to ensure Aboriginal people can live and stay on Country.</p>	<p>Aboriginal housing has been identified in Objective 1. Strategy 1.5 provides an opportunity for LALCs to identify lands that may be suitable for housing on Country.</p>
	<p>There is a lack of cultural infrastructure for Aboriginal communities across the region. Increased access to important land for cultural practice is also a priority which the plan does not currently address.</p>	<p>Cultural infrastructure was not included in the draft Plan. Objective 19 has been amended to now include cultural infrastructure as part of Public Spaces. Strategy 19.1 has been updated to encourage councils to consider cultural infrastructure requirements in any public open space planning.</p> <p>Access to land is generally dealt with through land claims. Strategy 13.2 already addresses the timely return of land through this process.</p>
	<p>LALCs and other Aboriginal organisations are not funded adequately to fulfil their duties under various legislation or participate fully in the planning system. Funding is required to achieve the potential of the Objectives and Strategies in the Plan.</p>	<p>The lack of resourcing for LALCs across the region is acknowledged and now referenced in Objective 13. However, funding allocation is outside the scope of the regional plan.</p>
<p>Natural Hazards</p>	<p>Thoughts/suggestions on ways to build back better in flood affected areas such as Lismore including manufactured homes.</p>	<p>Building Back Better and Northern Rivers Reconstruction and Adaptation guidance provided in the regional plan. Building design and development will be assessed on its merits by the relevant determining authority. NSW Government continues to review its policy on manufactured homes.</p>

Submission theme	Submission summary	Department response
	Concerns raised over DAs approved within the floodplains.	Council's strategic documents and LEPs are required to be consistent with the RP. Objective 5 of the plan sets out a number of strategies to mitigate the impact and reduce exposure from natural hazards. This includes strategies for strategic plans and local plans to update flood studies and management plans, and to locate development away from areas with known high flood risks. The Department will work through the recommendations from the expert inquiry into the preparation for, causes of, response to and recovery from the 2022 catastrophic flood event across NSW and implement them where necessary.
	Concerns raised about developments encroaching into environmentally sensitive areas.	The plan balances economic, social and environmental issues. The plan has strengthened its position on protecting the environment and resilience and natural hazards through a number of strategies, actions and collaboration activities.
	Water management is a significant issue and the outcomes of the 2022 NSW Flood Inquiry should be taken into consideration in the finalisation of this plan	The final Plan is consistent with the recommendations of the 2022 NSW Flood Inquiry.
	Suggests coastal hazard mapping needs to be prepared by DPE	The plan has been updated to make more reference to coastal hazards. This includes strategies for councils to update Coastal Management Plans and locating development away from areas with coastal hazards.

Submission theme	Submission summary	Department response
Climate Change	<p>Draft plan needs to be reframed with a greater focus on climate change and should improve planning approaches to reduce future environmental impact</p>	<p>The structure of the plan and order of the themes has no bearing on the importance of the issue. Climate Change and hazards are adequately addressed in objective 5 including strategies for councils to update hazard strategies, use local plans to adapt to climate change and adopt the principles outlined in the Strategic Guide to Planning for Natural Hazards.</p> <p>The Regional Plan has strengthened its response to hazards and climate change since the 2036 version. The plan is however limited to land use planning responses.</p> <p>The Regional Plan will be updated to reflect the government’s position on the recommendations from the flood enquiry at the time of its release. The Regional Plan is consistent with the findings of the enquiry.</p>
	<p>Planning is needed now to counter future impacts of Sea Level Rise and expected loss of coastal lands, towns and infrastructure including highway access. Suggests environmental corridors will become more necessary as a result of SLR to enable wildlife migration inland and that legislation is required to protect and buffer OEH/NPWS lands.</p>	<p>Planning for sea level rise is addressed in Objective 5: Manage and improve resilience to shocks and stresses, natural hazards and climate change</p>
	<p>Resilience should be embedded into the Regional Plan.</p>	<p>The State-wide Natural Hazards Package guides how natural hazard risk is considered in local land use planning. In addition, Action 5 of the plan is for the resilience team to work with councils to continue to provide guidance and tools for councils to use for evidence-based risk-management approaches to build resilience to shocks and stresses, plan for natural hazards and transition to net zero emissions</p>

Submission theme	Submission summary	Department response
Water	Aboriginal people strongly believe that water needs to be protected for the use of all living things. Sites of water have cultural significance and should be cared for and maintained.	Acknowledgement to Country and Objective 9 updated to reflect that healthy waterways are critical to Aboriginal communities and that there is a cultural obligation to care for Country which includes land, sea, skies and water.
	Suggests significant aspects relating to water resources are missing from the plan as the focus is predominantly on water catchment, downstream water and ground water resources	The plan has been developed in consultation with the relevant water agencies. A number of strategies are in place in both Objective 3 in regard to water quality, Objective 5 in relation to hazards and resilience and Objective 9 in terms of quality, supply and availability.
Biodiversity / High Environmental Value land	Concern raised over limiting of Environmental/ Conservation zones in rural areas to parts of the proposed footprint where environmental attributes have been verified will result in severe habitat loss.	Limiting Conservation zones to the footprint will not result in any more habitat loss from development facilitated under the plan. If areas outside the footprint were to be developed then the relevant approvals, assessments and studies would need to be undertaken.
	Concern raised regarding focus on housing rather than protection of the environment	The Plan attempts to balance environmental, social, and economic issues. Housing is a key government priority. Since the recent bushfire and flooding events hazard and resilience has also become a strong focus of the plan.

Submission theme	Submission summary	Department response
	<p>Poor environmental planning and practice has resulted in widespread deforestation, habitat loss and increased hard surfaces and exacerbated flooding in the region. Greater emphasis on climate change adaption and reduction measures are needed to ensure these impacts are considered in development. Appropriate environmental protection needs to extend to all biodiversity areas (not just significant or vulnerable habitat).</p>	<p>The regional plan cannot reverse previous planning decisions but does strengthen environmental protection through Objective 3 and a number of supporting strategies, actions and collaboration activities, while balancing environmental, social and economic issues.</p>
	<p>Concern the plan does not make adequate provision for the protection of koalas.</p>	<p>Objective 3 has a number of strategies, actions, and collaboration activities to help protect and enhance environmental assets. Following comments from the Biodiversity and Conservation Division this has been further strengthened including strategies to protect koalas.</p>
	<p>Reflection of regionally significant critical habitat corridors for biodiversity should be included in the plan.</p>	<p>Biodiversity corridor mapping is out of scope and responsibility of the Biodiversity and Conservation Division. The plan has a number of strategies to protect, maintain and restore environmental assets and asked reference to the government’s HEV map which is the responsibility of the Biodiversity and Conservation Division.</p>
<p>Circular Economy / Renewable Energy</p>	<p>Regional Plans and supporting strategies should set pathways to net zero carbon, identify new precincts to become carbon neutral and regional plans should identify land and assets to support renewable energy and enable offsets.</p>	<p>The government’s plan to reach net zero carbon is detailed in the Net Zero Plan Stage 1: 2020-2030. The Regional Plan is consistent with existing government direction and policy.</p>

Submission theme	Submission summary	Department response
	<p>Improvements in renewable energy are currently hampered by a lack of suitable transmission lines to connect to the grid.</p>	<p>Transmission is one hurdle faced by large scale electricity generators. As discussed in Objective 7, the NSW Government’s Electricity Infrastructure Roadmap is the government’s plan to coordinate investment in transmission, generation, storage and firming infrastructure as ageing coal-fired generation plants retire.</p>
	<p>Concern that biomass/ bioenergy is not a suitable replacement as a renewable energy generator.</p>	<p>Biomass is part of a suite of options to replace coal energy power stations. Bioenergy would use waste products which would otherwise be discarded to create energy and support other types of energy generation.</p> <p>The regional plan promotes the use of biomass sourced from wastes and by-products. Local sustainable biomass does not include clearing of native habitat. The technologies to combat emissions from burning will be assessed during the relevant assessment stage of any project.</p> <p>Collaboration Activity 2 which aimed to source affordable biomass from these sustainable sources has been deleted as this is the responsibility of DPI.</p>