



FAR NORTH COAST REGIONAL STRATEGY

**Submission of the Urban Development Institute
of Australia Northern Rivers Chapter
to the Department of Planning**



MAY 2006

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SUMMARY

The strategy is an opportunity to recognize and capitalise on the Far North Coast's strengths and opportunities in conjunction with the management of population growth. UDIA NSW is therefore disappointed that the draft Strategy is largely built around existing Local Environmental Plans and Land Release Strategies and appears to be rigidly focused on preventing and constraining growth outside of these designated areas instead of encouraging innovative and sustainable planning and environmental outcomes.

In the absence of any proposed incentives or initiatives to foster development outside the areas experiencing demand for urban land, UDIA NSW suggests that population growth will continue in coastal areas and will significantly influence demographic change and the corresponding demand for services in the region. Historic growth patterns reflect a considerably higher demand for urban land in coastal areas, and this is not simply a reflection of favorable land use planning provisions. It is implicit in the assumptions of the draft strategy that this trend can be abated by attempting to foster the development of inland centres.

While the draft strategy acknowledges the need within the region to supply additional dwellings to support the projected population increases, UDIA is concerned that there is no demonstrated nexus between the market driven demand for urban land in the region and the proposed supply under the draft strategy. UDIA NSW believes that a more sound recognition within the draft strategy of the nexus between population distribution and land demand is critical. Without a firm and demonstrated understanding of the factors that have influenced urban settlement in the region in the past, it is questionable to suggest that in-migration will simply occur as dictated in the strategy as a matter of course.

The Strategy also appears to take the approach of an extremely broad-scale identification of potential constraints and then filling in the 'gaps'. We consider that all land is constrained to a certain extent and that the Department's approach will unduly preclude the consideration of potentially positive and innovative planning and environmental outcomes in conjunction with appropriate amelioration.

The draft strategy proposes to limit future development in the Coastal Area to the 'Town and Village Growth Boundaries'. These growth boundaries comprise land that is already zoned and developed for urban purposes and land that is identified in existing land release strategies/zoned for urban investigation. The Department would be aware that the boundaries of Councils' land release strategies are generally based on limited broad-scale strategic planning investigations and often follow cadastral boundaries. Consequently, the configuration of many land release strategies tends to reflect historic subdivision patterns, not necessarily the characteristics, opportunities or constraints applying to any particular property or part thereof. UDIA NSW is deeply concerned that the Department's 25 year strategy to facilitate the orderly and sustainable development of the region has individual Councils' urban growth plans as its principal construct.

Furthermore, the strategy seeks to prohibit the residential development of any land within the growth boundary areas that may potentially be subject to a 1:100 year flood event. A significant amount of land contained within the growth boundaries proposed is subject to a 1:100 year flood event and is therefore unavailable for future residential development. UDIA NSW is thus surprised that the Department has nominated particular

lands to support projected increases and corresponding residential development that, by its own direction, are unable to serve that purpose.

UDIA NSW is concerned that infrastructure and funding has been divorced from the planning document. Nonetheless, UDIA NSW observes that while the Department of Planning no longer considers itself qualified to discuss infrastructure it has not been reticent in seeking private investment. The report states that:

'any future development of greenfield sites outside areas identified as future urban or employment in the strategy will be required to fully or substantially contribute to additional regional infrastructure costs including any backlog, with the contribution to be determined after taking into account the regional strategy and any associated infrastructure plan and equity considerations.'

These statements should be removed from the document. UDIA NSW contends that a discussion of public and private infrastructure funding has to be undertaken concurrently with a fully documented understanding of what services are needed, their timing and an appreciation of the available financial models.

The implementation of the strategy is to be the responsibility of Councils through their LEP's. UDIA NSW believes that a coordinated approach is needed to address matters of staging and infrastructure provision. Given the direction within the draft strategy to divorce the demand for urban land in the region with an appropriate strategy to supply land to support the projected population increase, UDIA NSW would like to see the establishment of a Development Corporation or a regional planning authority to coordinate the delivery of new settlements in the region. As a minimum, a Far North Coast Urban and Infrastructure Program with whole-of-Government support is required.

RECOMMENDATIONS

1. That the Far North Coast Regional Strategy demonstrate a better understanding of the social, economic, environmental and historic factors that have influenced population growth in the region, and the relationship between these factors and the demand for residential and employment land.
2. The draft North Coast Regional Strategy allow for future urban investigation zoning to support the growth in population to ensure that supply of land is appropriate to cater for forecast demand.
3. That the use of extremely broadscale mapping, in particular the proposed Environmental Assets and Rural Land Area designation, in conjunction with a prohibition of rezoning considerations should be removed as this rigid approach precludes the consideration of potentially innovative and beneficial land uses.
4. The Far North Coast Regional Strategy should incorporate a sufficient level of flexibility to facilitate the consideration of outcomes that do not fit neatly into the growth boundary areas.
5. The growth area boundaries be amended to reflect the region's genuine capacity to support projected population increases and demand for residential development. This process should be informed by a process of rigorous environmental, social and economic investigations, rather than simply broad scale local government strategic planning.
6. The strategy should allow for the consideration of new rural residential zoning and development within the Coastal Area – subject to the Sustainability Criteria provided in the document.
7. That the Far North Coast Regional Strategy should clearly articulate its intent with regard to the growth areas and their capacity to support the projected population increases and subsequent demand for urban land. This must include clarifying inherent inconsistencies in the strategy in relation to the development of flood prone land in these areas, and previous documentation published by Department on residential development in flood prone areas.
8. The draft strategy be amended to permit the consideration of development of potentially constrained land in conjunction with appropriate amelioration, for both the Coastal Area and Inland Area.
9. That the Far North Coast Regional Strategy should identify infrastructure needs to facilitate the delivery of new communities and the consolidation of existing centres.

10. That the Far North Coast Regional Strategy should discuss public and private infrastructure funding concurrently within the context of a fully documented understanding of what services are needed, their timing and an appreciation of the available financial models.
11. That the Far North Coast Regional Strategy should recommend the establishment of a Development Corporation, or a regional planning authority to coordinate the delivery of new settlements in the region. As a minimum, a Far North Coast Urban and Infrastructure Program with whole-of-Government support is required.

1. INTRODUCTION

In March 2006 the Department of Planning (Department) released for exhibition the Draft Far North Coast Regional Strategy. The unavailability of supporting documentation and policy, as referenced in the strategy, presents a constraint to the provision of a comprehensive review by the UDIA. Accordingly, this submission is an abridged account of UDIA NSW's positions and UDIA reserves the right to offer additional comment as further detail is revealed by the NSW Government.

UDIA NSW appreciates this opportunity to comment on the draft strategy and commends the Department for initiating regional planning for the future of this important area. While some of the comments included in this submission are critical, they should be interpreted as contributing to a robust debate in the interests of achieving optimum outcomes including a balanced realisation of environmental, social and economic objectives.

The urban development industry is responsible for delivering the strategy. Accordingly, UDIA NSW believes that it can offer practical and insightful observations and solutions to assist the government in releasing an appropriate plan for such an attractive region.



2. POPULATION GROWTH AND DISTRIBUTION

The draft strategy estimates the population of the Far North Coast will grow from its current level of approximately 228,000, by 26% over a period of 25 years to 289,000 in 2031. UDIA NSW contends that these population projections are conservative, and simply reflect a continuation of historical trends, as shown in Figure 1 – Historic and Projected Populations, as lifted from the draft strategy.

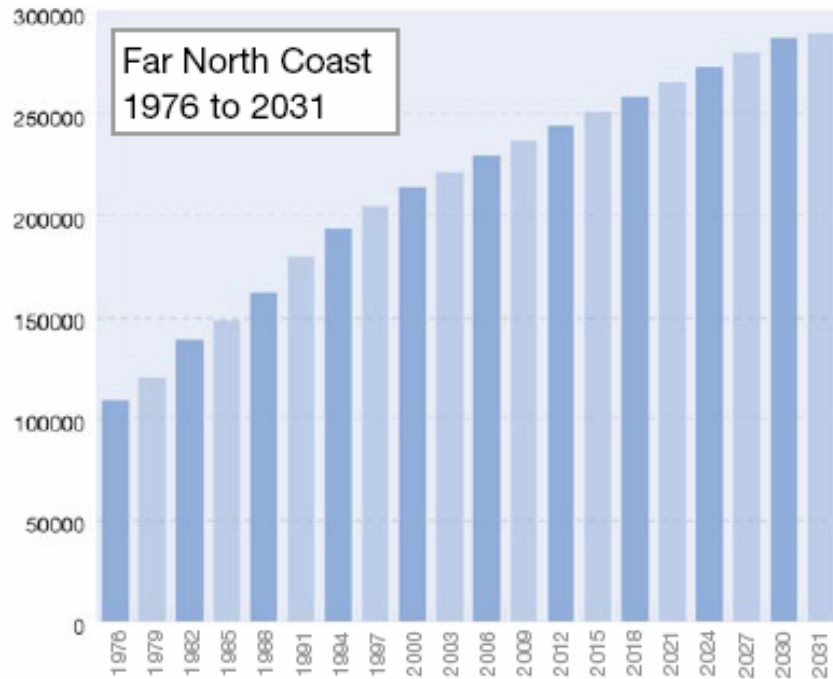


Fig 1 - Historic and Projected Populations

UDIA NSW is concerned that the draft strategy does not reflect the spatial distribution of historic and projected populations and seems to take little account of where growth has, and will occur. A complex interplay of social, economic, environmental and historic factors have resulted in and continue to affect existing settlement patterns in the Far North Coast region. UDIA NSW is concerned that the dialogue within the strategy is not demonstrative of a comprehensive understanding of these factors.

The draft strategy correctly acknowledges that future population pressures, and a corresponding demand for urban land, will be around the regional centres of Tweed Heads and Ballina and within the other coastal settlements east of the Pacific Highway. These pressures are a reflection of 'push' and 'pull' factors and the demands of a changing demographic within the region. Historic growth patterns reflect a considerably higher demand for urban land in coastal areas, and this is not simply a reflection of favorable land use planning provisions. It is implicit in the assumption of the draft strategy that this trend can be abated by attempting to foster the development of inland centres.

Figure 2 below demonstrates the distribution of population growth in the region from 1991 – 2001. There are a range of factors that have influenced population growth throughout the region and will continue to do so in the future. It is overly simplistic to assume that this trend can be changed by “preventing the spread of coastal development and encouraging the development of inland centres.”

Table 1: Population growth in Northern Rivers Local Government areas and NSW, 1991-2001

	Population			Total Growth	
	1991	1996	2001	1991-1996	1996-2001
Byron	22,823	27,565	30,245	20.8%	9.7%
Ballina	30,110	34,702	37,218	15.3%	7.3%
Copmanhurst	3,847	3,968	4,133	3.1%	4.2%
Grafton	17,124	17,110	16,704	-0.1%	-2.4%
Kyogle	9,744	9,716	9,169	-0.3%	-5.6%
Lismore	41,389	42,954	41,883	3.8%	-2.5%
Maclean	13,952	15,987	17,453	14.6%	9.2%
Pristine Waters	9,679	10,501	10,662	8.5%	1.5%
Richmond Valley	19,853	20,833	20,369	4.9%	-2.2%
Tweed	55,857	66,865	74,380	19.7%	11.2%
Northern Rivers	224,378	250,201	262,216	11.5%	4.8%
NSW	5,732,032	6,038,696	6,371,745	5.4%	5.5%
Gold Coast	268,662	334,826	396,588	24.6%	18.4%

Source: Australian Bureau of Statistics, Population Census 1991, 1996, 2001

Fig 2: Population Growth in Northern Rivers Local Government Areas and NSW, 1991 – 2001

The draft strategy acknowledges that growth in the hinterland areas has been low or static in comparison to moderate growth in the coastal areas. UDIA NSW is concerned that the strategy states that future growth will be managed by encouraging the development of inland centres, yet fails to provide any detail on how this growth will be encouraged or facilitated. The above figure illustrates the divergent growth patterns in the region between the coastal and inland areas – a trend that will continue over the life of the strategy.

In the absence of any proposed incentives or initiatives to foster development outside the areas experiencing demand for urban land, UDIA NSW suggests that population growth will continue in coastal areas and will significantly influence demographic change and the corresponding demand for services in the region. UDIA NSW believes that a more realistic recognition is critical within the draft strategy of the nexus between population distribution and land demand. Without a firm and demonstrated understanding of the factors that have influenced urban settlement in the region in the

past, it is high questionable to suggest that in-migration will simply occur as dictated in the strategy as a matter of course.

Recommendation 1

That the Far North Coast Regional Strategy demonstrate a better understanding of the social, economic, environmental and historic factors that have influenced population growth in the region, and the relationship between these factors and the demand for residential and employment land.

3. Land Supply and Demand

The draft strategy is an opportunity to recognise and capitalise on the Far North Coast's strengths and opportunities in conjunction with the management of population growth. UDIA NSW is therefore disappointed that the draft strategy is largely built around existing Local Environmental Plans and Land Release Strategies and appears to be rigidly focused on preventing and constraining growth outside of these designated areas instead of encouraging innovative and sustainable planning and environmental outcomes.

The draft strategy acknowledges the need within the region to supply additional dwellings to support the projected population increases, however UDIA is concerned that there is no demonstrated nexus between the actual demand for urban land in the region and the proposed supply of new land under the draft strategy. Implicit in the directions within the strategy is a belief that greenfields development within the Coastal Area should be curtailed in favour of fostering development in inland centres – where growth has long been static or negative.

The predetermination of land for urban development will concentrate the supply of land for this purpose among a small number of landholders, potentially further exacerbating an already significant housing affordability problem. According to the *Northern Rivers Regional Profile* prepared for the Department in 2003,

*'Escalating land values in these areas could also have the effect of raising rates out of reach of residents who may have owned property in the area for many years. If more and more areas become too expensive for people on low and/or fixed incomes, there could be an increase in people becoming homeless or living in marginal, inadequate accommodation.'*¹

Whilst the draft strategy recommends that Councils should prepare an Affordable Housing Strategy, *'to ensure there is a range of housing types available throughout the Region'*, an inadequate supply of land suitable for residential development will substantially devalue this process.



¹ The Hunter Valley Research Foundation (2003) *Northern Rivers Regional Profile*, prepared for the Department of Planning, Infrastructure and Natural Resources.

UDIA is very concerned that the regional strategy seeks to curtail coastal growth on the basis of broad scale constraint mapping rather than seeking to work with the development industry to plan for and identify the means to accommodate sustainable urban development. The UDIA contends that the regional strategy should seek to better understand the drivers of growth in the region, and the corresponding demand for urban land as a product of population increases. The philosophy of directing growth to inland centres is contrary to an understanding of the 'push' and 'pull' factors that have and will to continue to influence development in the region and ensure an adequate supply of housing is accommodated in a sustainable and affordable manner.

The intent of the strategy to accommodate future growth within existing growth boundaries is of considerable concern to the UDIA NSW given the inconsistencies within the draft strategy in terms of the rationale for determining which land is suitable for residential development. These inconsistencies plague the document and fail to provide the certainty that was sought by the industry from the strategy.

Recommendation 2

The draft North Coast Regional Strategy allow for future urban investigation zoning to support the growth in population to ensure that supply of land is appropriate to cater for forecast demand.

Recommendation 3

That the use of extremely broadscale mapping, in particular the proposed Environmental Assets and Rural Land Area designation, in conjunction with a prohibition of rezoning considerations should be removed as this rigid approach precludes the consideration of potentially innovative and beneficial land uses.

4. FLEXIBILITY OF PLANNING PROVISIONS

The draft strategy proposes to limit future development in the Coastal Area to the 'Town and Village Growth Boundaries'. These growth boundaries comprise land that is already zoned and developed for urban purposes and land that is identified in existing land release strategies/zoned for urban investigation. Furthermore, the strategy seeks to prohibit land the residential development of any land within the growth boundary areas that may potentially be subject to a 1:100 year flood event. A significant amount of land contained within the propose growth boundaries is potentially subject to a 1:100 year flood event and is therefore unavailable for future residential development. UDIA NSW is surprised that the Department has nominated particular lands to support projected increases and corresponding residential development that, by its own direction, are unable to serve that purpose.

The Department would be aware that the boundaries of Councils' land release strategies are generally based on limited broad-scale strategic planning investigations and often follow cadastral boundaries. Consequently, the configuration of many land release strategies tend to reflect historic subdivision patterns, not necessarily the characteristics, opportunities or constraints applying to any particular property or part thereof. UDIA NSW is deeply concerned that the Department's 25 year strategy to facilitate the orderly and sustainable development of the region will remain constrained by questionable local growth boundaries.

This approach also assumes that Councils' strategic planning processes have correctly identified the land that is most suited for future urban use. Given that strategic planning is generally undertaken on the basis of broad-scale investigations, it is uncertain whether the Growth Areas represent the optimum location or configuration of the future development of the important and sensitive Coastal Area, or would facilitate contemporary and sustainable settlement planning and urban design. UDIA NSW therefore considers that the proposed Growth Boundaries within the Coastal Area should incorporate a level of flexibility to enable the consideration of positive and environmentally sustainable zoning and development that may not fit into the proposed Growth Boundary areas.



UDIA NSW is also concerned that the draft strategy prohibits new rural residential development within the coastal area – other than development already zoned or within an existing rural residential release strategy. Again, this approach is highly inflexible and assumes that the existing settlement strategies represent optimum planning outcomes for the important Coastal Area. It is suggested that appropriate and well designed rural residential development can contribute to a balanced and sustainable land use fabric for the region and that the strategy should not preclude the consideration of such proposals.

Recommendation 4

The Far North Coast Regional Strategy should incorporate a sufficient level of flexibility to facilitate the consideration of outcomes that do not fit neatly into the growth boundary areas.

Recommendation 5

The growth area boundaries be amended to reflect the region's genuine capacity to support projected population increases and demand for residential development. This process should be informed by a process of rigorous environmental, social and economic investigations, rather than simply broad scale local government strategic planning.

Recommendation 6

The strategy should allow for the consideration of new rural residential zoning and development within the Coastal Area – subject to the Sustainability Criteria provided in the document.

5. ASSESSMENT OF POTENTIALLY CONSTRAINED LAND

The draft strategy correctly acknowledges the region's significant biodiversity value. The Far North Coast contains more than 20 national parks, significant farmland, and valuable bushland. It is critically important to acknowledge the substantial contribution these factors make to the attractiveness and appeal of the region. UDIA NSW is concerned however, that the draft strategy takes the approach when determining land suitable for greenfields development, of broadly identifying potential constraints then filling in the 'gaps'. All land is essentially constrained to a certain extent, and the Department's approach will unduly preclude the consideration of potentially positive and innovative planning and environmental outcomes in conjunction with appropriate amelioration.

UDIA NSW agrees that development should not proceed on heavily constrained land which has been subject to rigorous investigation and for which no reasonable amelioration is possible. We consider, however, that the presence of potential constraints should not preclude rezoning for potentially suitable development in conjunction with amelioration and management measures.

The draft strategy seeks, as per Page 9, to *'Prevent development in places constrained by coastal processes, flooding...'* Further, the generic Sustainability Criteria, which do not apply to the Coastal Area, state that no residential development will be allowed in the 1:100 floodplain. UDIA NSW is deeply concerned that what could be the general intent of the strategy to prevent inappropriate development in constrained areas could subsequently be literally interpreted by planning authorities such that all development of flood prone land, or land subject to other potential constraints, is precluded.

Of deep concern to UDIA NSW, is that areas in the draft strategy within the growth boundary areas, and ostensibly suitable and desirable for residential development, are identified within the strategy as being prone to be subject to a 1:100 year flood event. The figures provided below, as provided in the draft strategy, demonstrate this alarming inconsistency.

The figures provided overleaf that have been lifted from the draft strategy demonstrate the inherent inconsistency within the directions provided in relation to the development of residential land. The strategy insists that no residential development will be permitted on land within the 1:100 year floodplain, however much of the 'Growth Areas' nominated within the strategy are subject to 1:100 flooding events. Figure 3 clearly illustrates the area within the Ballina LGA that is earmarked to support further residential development – however, Figure 4 clearly illustrates that that same area is subject to 1:100 year flood events. This is not an isolated occurrence in the areas earmarked within the strategy to support residential development.

UDIA NSW is concerned that the areas nominated within the strategy to accommodate the additional residential development required to support projected population increases are within 1:100 year flood prone areas, yet the draft strategy has directed that no residential development will be allowed on these lands. The Department's intention for this land is inconsistent and confusing for the industry and the community.

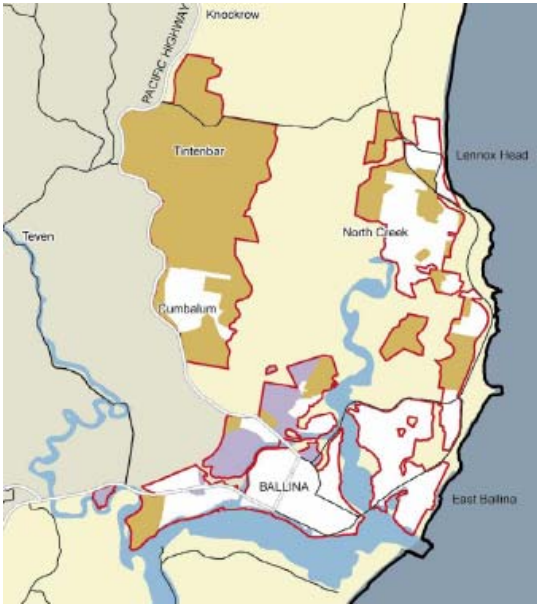


Fig 3 – Ballina Growth Map



Fig 4 – Natural Hazards Map

If it is the intention of the draft strategy to prevent development of Coastal Area land subject to flooding, in the interests of avoiding glaring inconsistencies and ambiguity, this land should not be mapped as a 'Growth Area' and should be excluded from projections of the population that can be accommodated within 'Growth Boundaries'.

UDIA NSW further contends that land that has been identified as subject to a 1:100 year flood event should not be automatically precluded from future residential development. The Department would be aware for example, that all of Ballina Island is flood prone, yet the island contains numerous examples of development that have been approved and/or successfully created on flood prone land. This position is vindicated by the Department's *Floodplain Development Manual: the management of flood liable land*, which states,

*'The policy does not support the use of zoning to unjustifiably restrict development simply because land is flood prone. Zoning of flood prone land should be based on an objective assessment of land suitability and capability, flood risk, environmental and other factors.'*²

Further, Clause 1.1 of the *Manual* states that,

The primary objective of the New South Wales Flood Prone Land Policy, as outlined below, recognises the following two important facts:

- *flood prone land is a valuable resource that should not be sterilized by unnecessarily precluding its development; and*
- *if all development applications and proposals for rezoning of flood prone land are assessed according to rigid and prescriptive criteria, some appropriate proposals may be unreasonably disallowed or restricted, and equally, quite inappropriate proposals may be approved.'*³

² The Department of Infrastructure, Planning and Natural Resources (2005), *Floodplain Development Manual: the management of flood liable land*.

³ *ibid*



Given the inconsistencies within the draft strategy in relation to development potential within growth boundary areas, UDIA NSW is concerned about the criteria that have been used to determine these boundaries and whether sufficient rigour has been applied in this regard. The intent of the direction provided in the strategy, given the conflict within both the document and recent floodplain policy from the Government, is cause for considerable concern. It is apparent that parts of the strategy have been prepared on the basis of generic and outdated principles, with no regard for the unique nature of the region.

Recommendation 7

That the Far North Coast Regional Strategy should clearly articulate its intent with regard to the growth areas and their capacity to support the projected population increases and subsequent demand for urban land. This must include clarifying inherent inconsistencies in the strategy in relation to the development of flood prone land in these areas, and previous documentation published by Department on residential development in flood prone areas.

Recommendation 8

The draft strategy be amended to permit the consideration of development of potentially constrained land in conjunction with appropriate amelioration, for both the Coastal Area and Inland Area.

6. INFRASTRUCTURE

UDIA NSW supports the coordinated release of greenfield land with high quality neighbourhood design and effective use of infrastructure. Future growth in the region, both in the development of greenfields and in the consolidation of existing urban centres will require significant investment with respect to the provision of:

- utilities,
- transport,
- open space and
- communications

UDIA NSW is concerned that infrastructure and funding has been divorced from the planning document. Nonetheless, UDIA NSW observes that while the Department of Planning no longer considers itself qualified to discuss infrastructure it has not been reticent in seeking private investment. The draft strategy as proposed will:

'Require all major development proposals to fully or substantially contribute to additional regional infrastructure costs, including any backlog, with the contribution to be determined after taking account of the Regional Strategy, any associated infrastructure plan and equity considerations.'

UDIA contends that a discussion of public and private infrastructure funding should be undertaken concurrently with a fully documented understanding of what services are needed, their timing and an appreciation of the available financial models.

Recommendation 9

That the Far North Coast Regional Strategy should identify infrastructure needs to facilitate the delivery of new communities and the consolidation of existing centres.

Recommendation 10

That the Far North Coast Regional Strategy should discuss public and private infrastructure funding concurrently within the context of a fully documented understanding of what services are needed, their timing and an appreciation of the available financial models.

7. IMPLEMENTATION

The implementation of the strategy is to be the responsibility of Councils through their LEP's. UDIA NSW believes that a coordinated approach is needed to address matters of staging and infrastructure provision. Given the absence of a link within the draft strategy between the demand for urban land in the region and an appropriate strategy to supply land to support the projected population increase, UDIA NSW would like to see the establishment of a Development Corporation or a regional planning authority to coordinate the delivery of new settlements in the region. As a minimum, a Far North Coast Urban and Infrastructure Program with whole-of-Government support is required.

Although there is a requirement to bring LEP's in line with the regional strategy, the LEP still remains the fundamental control mechanism for development in the region. This approach suggests that decisions affecting development will be made at the local level. This is in contrast to the Growth Centres approach that has been adopted to implement Sydney's Metro Strategy.

The Strategy lacks an identifiable 'regional owner' with strategic authority and responsibility. As such, it is difficult to see how separate Far North Coast councils will effectively deal with state based agencies to achieve regional rather than local outcomes. This is especially relevant given that each state authority considers their own area of responsibility in isolation of all others.

Accordingly, UDIA NSW would ideally seek the establishment of a Regional Development Authority responsible to the Minister, to:

- ensure consistency of approach between the regional strategy and Local Government;
- ensure consistency of approach between individual councils; and
- monitor performance of the Far North Coast Regional Strategy against clearly stated performance objectives.



The Regional Development Authority would also be useful in overcoming potential problems that may exist because of lags between adopting/reviewing the strategy and amending LEP's. The draft strategy makes reference to the following documents which have not been released:

- Regional Conservation Plan;
- a possible Regional Infrastructure Plan; and the
- State Infrastructure Plan.

In addition to these unreleased documents the strategy identifies the following unknown processes.

- development contributions to support infrastructure; and
- biodiversity banking.

Furthermore, the strategy provides for five yearly reviews but fails to set clearly defined objectives against which progress can be measured nor does it document a process for review.

UDIA NSW therefore requests that the Government release all outstanding plans as soon as possible. The release of this information should be supported by the release of background reports and studies used in formulating the current draft strategy.

RECOMMENDATION 11

That the Far North Coast Regional Strategy should recommend the establishment of a Development Corporation, or a regional planning authority to coordinate the delivery of new settlements in the region. At a minimum, a Far North Coast Urban and Infrastructure Program with whole-of-Government support is required.

8. CONCLUSION

The strategy is an opportunity to recognize and capitalise on the Far North Coast's strengths and opportunities in conjunction with the management of population growth. UDIA NSW is therefore disappointed that the draft strategy is largely built around existing Local Environmental Plans and Land Release Strategies and appears to be rigidly focused on preventing and constraining growth outside of these designated areas instead of encouraging innovative and sustainable planning and environmental outcomes

Within the spirit of this offer, UDIA NSW offers the following recommendations:

1. That the Far North Coast Regional Strategy demonstrate a better understanding of the social, economic, environmental and historic factors that have influenced population growth in the region, and the relationship between these factors and the demand for residential and employment land.
2. The draft North Coast Regional Strategy allow for future urban investigation zoning to support the growth in population to ensure that supply of land is appropriate to cater for forecast demand.
3. That the use of extremely broadscale mapping, in particular the proposed Environmental Assets and Rural Land Area designation, in conjunction with a prohibition of rezoning considerations should be removed as this rigid approach precludes the consideration of potentially innovative and beneficial land uses.
4. The Far North Coast Regional Strategy should incorporate a sufficient level of flexibility to facilitate the consideration of outcomes that do not fit neatly into the growth boundary areas.
5. The growth area boundaries be amended to reflect the region's genuine capacity to support projected population increases and demand for residential development. This process should be informed by a process of rigorous environmental, social and economic investigations, rather than simply broad scale local government strategic planning.
6. The strategy should allow for the consideration of new rural residential zoning and development within the Coastal Area – subject to the Sustainability Criteria provided in the document.
7. That the Far North Coast Regional Strategy should clearly articulate its intent with regard to the growth areas and their capacity to support the projected population increases and subsequent demand for urban land. This must include clarifying inherent inconsistencies in the strategy in relation to the development of flood prone land in these areas, and previous documentation published by Department on residential development in flood prone areas.
8. The draft strategy be amended to permit the consideration of development of potentially constrained land in conjunction with appropriate amelioration, for both the Coastal Area and Inland Area.

9. That the Far North Coast Regional Strategy should identify infrastructure needs to facilitate the delivery of new communities and the consolidation of existing centres.
10. That the Far North Coast Regional Strategy should discuss public and private infrastructure funding concurrently within the context of a fully documented understanding of what services are needed, their timing and an appreciation of the available financial models.
11. That the Far North Coast Regional Strategy should recommend the establishment of a Development Corporation, or a regional planning authority to coordinate the delivery of new settlements in the region. At a minimum, a Far North Coast Urban and Infrastructure Program with whole-of-Government support is required.

9. UDIA – NSW

UDIA Mission

UDIA is the voice of development. We represent the industry which develops new communities and proudly advocate for its interests. We pursue access to land for development, encourage the creation of a positive regulatory environment, and seek to moderate the burden of taxes and charges on our customers. We believe in affordable, sustainable, and liveable communities.

The Urban Development Institute of Australia (UDIA) is Australia's peak representative body for all segments of the urban development industry.

The UDIA NSW Code of Ethics

A UDIA member shall:

- Demonstrate ethical principles and observe the highest standards of integrity and honesty in all professional and personal dealings.
- Uphold and promote the reputation of the Urban Development Institute of Australia (NSW) and not misuse the authority of office for personal gain.
- Respect the confidentiality of information given to the member in the course of the Institute's work.
- Engage in continued learning to maintain and improve professional skills and competence within the industry and promote innovation and excellence in practice.
- Strive to achieve sustainable development.
- Respect for the rights of consumers and maintain the public's confidence and trust in the urban development industry.

UDIA NSW is a progressive organisation driven by its members. Our President, Council, Chapters and Committees, Executive Director and staff ensure that we give members and sponsors maximum value for their investment.

UDIA's Goals

- Promote high standards for the urban development industry
- Promote respect for the inherited and natural environment while creating quality, dynamic built environments
- Ensure the skills which make up the membership of the Institute will be applied to principles of good planning, efficient land utilisation and sustainability of resources for future generations

- Institute a continuing education and research program to support and assist the industry and for the benefit of others associated with urban development
- Promote greater understanding in the community on the role and achievements of the urban development industry.

UDIA's Activities

Advocacy

Lobbying government so that urban development can be undertaken positively and creatively for the widest benefit

Learning

Keeping members and others up to date on critical industry issues and best practice through seminars, conferences and communications. Our regular UDIA journal, The Developers Digest, is a quality publication for those serious about their business and profession. We also communicate the latest news and views through our e-newsletter, The Developers Update.

Innovation

Encouraging innovation and excellence through the annual UDIA NSW Awards for Excellence and giving exposure to the best in contemporary development throughout the year.

Better Business

Providing opportunities for business networking and learning. The UDIA NSW programme includes a full calendar of events with technical seminars, site visits and business luncheons as well as our annual State Conference and the year's climax event, the annual Awards for Excellence Gala.