

## **INQUIRY INTO REGIONAL PLANNING PROCESSES IN NSW**

**Organisation:** Kyogle Council

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5 February 2015

The Director Standing Committee on State Development  
NSW Parliament House  
Macquarie Street  
SYDNEY NSW 2000

Dear Hon. Standing Committee Members,

### **Inquiry into regional planning processes in New South Wales**

Regional planning forms an important aspect of the overall planning for non-metropolitan councils and the economic prosperity and character of their communities. This is particularly the case for many smaller types of council that rely on a much broader economic base to sustain services and growth in prosperity. Regional differentiation and the diversity that it highlights and brings is important in identifying the 'edge' for many regional locations that help them to be competitive and also define the character assets that provide the fundamental base for their competitiveness (e.g. environmental and social aspects).

A strong and effective regional planning process has been demonstrated elsewhere to provide a significant contributing base in helping councils to identify and develop their community and economic strengths and to provide the necessary approval mechanisms and practice guidance to ensure that sustainable, beneficial progress is achieved. Regions also are what make up states and ultimately the nation. It very likely follows that if effective regional planning takes place and stronger regions result, then the respective state and nation as a whole will also be stronger.

Regional planning must be considered in the context of the other various legislative and policy processes that apply when considering potential impacts for local governments. In particular, the implementation processes must match the relevant strategic intent of regional plans. Detailed strategic outcomes, particularly where backed by well informed and detailed study at the 'front-end' of the planning process, should not require detailed, lengthy and potentially expensive approval processes.

Regional planning should also not be a static practice. Much of the form of regional planning in New South Wales has remained similar to that of the past 20-30 years. While these responses may have been suitable to the issues of the time when introduced, there has been much global and national economic change including a far greater emphasis on the importance of economics and growth management for community building. This is coupled with

unprecedented growing global markets which have provided a means of potentially reinvigorating many regional locations through expanded or new agricultural opportunities.

The renewed interest in regional growth, largely through renewed primary production opportunities, has also led to a reconfirmation of the importance of effective regional planning (strategic and regulatory). This includes its contribution towards the promotion and realisation of sustainable growth and the benefits that this may bring to communities. Notable contemporary examples elsewhere include the focus on Developing Northern Australia initiatives in WA, NT and Qld where considerable regional strategic planning is underway with approval to match to help more effectively realise strategic outcomes.

Any attempt to make regional plans and associated processes more effective in NSW must also be considered in the context of reforms affecting the planning system generally. This includes the operation of the legislation, state environmental planning policies, ministerial directions and local environmental plans as well the types of issues that are being targeted by the various instruments.

Finally, in addition to a contemporary agreed strategic framework and commensurate implementation (regulatory) processes, the regional planning processes must also be tailored to the available funding capabilities of the relevant stakeholders. This includes funding quantum and timeframes for funding expenditure on projects and other requirements. The State has a significant role to play in this regard, especially where smaller councils are involved which may have limited capacity to otherwise help catalyse planning visions and projects which could have significant regional and state benefits in the longer term.

The following submission outlines comments and recommendations for the matters identified by the Standing Committee.

### **Key Inquiry Points**

#### ***a) Opportunities to stimulate regional development under the planning framework including through legislation, policy, strategy and governance***

##### Comment

- Regional development is heavily dependent on sound and progressive planning frameworks that can identify regional competitive advantages while still also showing strong alignment with State strategic planning outcomes.
- Overall State beneficial outcomes are likely to be best supported through clear and well differentiated growth visions and strategies at the regional level, clearly recognising different strengths and opportunities. This should include linking of visions to broader contemporary state, national and international opportunities.
- Investment decision making is assisted by ensuring clear alignment between state planning legislation, policies, plans, and implementation at the local level. In an increasing competitive environment, approval processes must be appropriately streamlined while still ensuring optimal environmental outcomes are achieved. Strong evidenced-based planning involving appropriate front-end studies, including following any existing study protocols, should form a key part of the strategic planning process in order to minimise the need for more repetitive and detailed assessments at the approval stages.
- Removal of unnecessary bureaucratic processes resulting in duplication and unnecessary competition between local councils that otherwise have shared regional interests are important in establishing sustainable markets for investment and growth.

- Effective alignment between state legislation, regional strategic planning frameworks and local delivery platforms (e.g. local environmental plans) is regarded as a critical factor in helping to establish investor confidence in regional locations.
- Sound strategic planning at a regional level is essential for effective statutory planning controls providing the necessary purpose and rationale for any such controls.

### Recommendations

- 1) Focus on identifying specific competitive regional advantages as part of the strategic regional planning processes, recognising shared strengths as well as beneficial differences amongst local government areas within regions to aid the state's overall economic diversity and growth potential.
- 2) Utilise regional plans as a principal means of articulating the state interests of government agencies and committing those agencies to their respective aspects of the regional plans.
- 3) Ensure that regional plans identify and demonstrate alignment with broader State strategies so that this is evident in the narrative for readers including residents and potential investors.
- 4) Clearly differentiate aspects of regional plans that are to be incorporated into local plans at the strategic and statutory planning (i.e. development control) levels to proactively guide councils.
- 5) Ensure that state interests that are stated in regional plans are clearly articulated into actions that can be implemented by agencies and local councils at the plan making (e.g. LEP) and development assessment levels.
- 6) Ensure that state agency operational delivery plans are reflective of approved regional plans under the EP&A Act – i.e. minimise the number of other strategic plans and the risk of disparate planning outcomes through a variety of plans.
- 7) Ensure that a more open and collaborative approach is adopted at the plan making stage for regional plans utilising existing forums (e.g. Joint Organisations - JOs) as well as targeted, appointed taskforces or other planning committees to address specific sub-regional or land use planning matters. Incorporate a more inclusive and informed approach to regional planning that can more effectively inform the State accordingly to clearly defined terms of reference and specified timeframes with specialist expertise and experience (i.e. including local government, industry and community sectors).

### ***b) Constraints to regional development imposed by the planning framework, and opportunities for the framework to better respond to regional planning issues***

#### Comment

- Regional plans presently lack sufficient regional differentiation including the identification of regional competitive advantages.
- Existing regional plans and strategies appear too generalist and generic in their respective visions which can apply to any location within Australia (region or otherwise) – e.g. 'sustainable, diverse and liveable community that protects the environment' or the like.
- Existing plans have had an emphasis on existing government commitments and insufficient reference to potential catalyst actions that may activate preferred growth scenarios for regions and sub-regions.
- Regional plans often do not account for existing economic strengths and how these might be capitalised on in terms of emerging opportunities (e.g. agriculture in the Far North Coast Region – notably livestock). The opportunities should be clearly articulated in the narratives for such plans with appropriate planning outcomes and action identified accordingly.

- The existing state-wide planning framework is convoluted making the recognition of clear strategic objectives difficult due to the multiplicity and complexity of the framework – e.g. too many SEPPs and Section 117 Directions.
- The current planning framework has a lack of clarity concerning government concurrence requirements and associated development assessment provisions for development applications and approvals. This presents an unnecessary level of uncertainty for investment decision making as well as adding to potential delays in approval timeframes and risking different agency opinions over similar matters (i.e. inconsistent or uncoordinated government decision making). The NSW planning framework has too many concurrence arrangements amongst too many agencies and operates in an uncoordinated manner with no clear agreed timeframes.
- Regional plans, to date, have had a propensity towards environmental protection without an equal or balanced recognition of contemporary growth management issues. The plans have tended to reflect priorities from 20 years ago when comparative regional growth in many locations was higher and less of an imperative for prosperity in many regions (i.e. including the NSW Far North Coast) and when the demand for sustainable environmental management practices was much more of a key focus. While significant work has progressed and matured regarding implementation of environmental management requirements, similar advances for proactive regional growth management have tended to lag.
- Regional land use planning processes in NSW, in many instances, do not adequately recognise or optimally reflect the modern global economy. This includes the impacts of rapidly expanding inter-regional, interstate and international markets, advances in supply chain management including E-trade (internet ordering) and logistics advances and the manner in which this is likely to affect production, value-adding, packaging and distribution. This has been the case in the NSW Far North Coast Region.
- There should be no effective distinction, in principle, between rural regions and the metropolitan areas of Sydney, Hunter and Wollongong. While their respective issues will differ and implementation within the metro regions is expected to be much more sophisticated in terms of potentially administrative and other operational structures and sub-plans, at a strategic level they should all be considered as regions with individual plans. The identification of clearly defined economic, infrastructure and other linkages between regions (notably with Sydney) only constitute a further potential strengthening of such plans.

## Recommendations

- 1) Ensure that regional land use and development issues have equal government portfolio status at the Cabinet level (i.e. in terms of ministerial superiority) for more effective and consistent coordination and implementation of government policy – i.e. state and regional development should not be subordinate to other government portfolios.
- 2) Rationalise and simplify the array of SEPPs and S117 Directions into a single or far fewer SEPPs and Directions that deal with operational guidance matters only. The single SEPP should be written as an expression of the State interests for land use and development planning clearly articulating the relevant issues, intended planning outcomes and any further specific plan making or development assessment requirements for each of the defined state interests including how this applies to local councils and state agencies alike.
- 3) Separate regional state interest matters (i.e. that reflect the overall state interests but provide detail for any regional nuances) should also be included in regional plans.
- 4) Where practicable, matters of State interest included in a SEPP (and any regional plan) should be mapped by the Department administering the state's land use planning framework through the Department of Planning and Environment (NSW Planning Portal). This would provide greater transparency and make such information more accessible to

potential investors. The mapping should be easy to use, accurate and able to be readily accessed and printed in standard formats (e.g. PDF).

- 5) Section 117 Directions should be rationalised and simplified to provide detail for operational implementation issues only – e.g. plan making or development assessment procedures. They should not be used for policy articulation or control specification purposes.
- 6) Consideration should be given to the development of state-wide codes for the assessment of state interest matters where development consent or complying development approval is required for affected development. The codes should be readily available to anyone on the Department of Planning and Environment website and should ideally be located into one document or location. Codes should come with ‘ready-to-go’ assessment sheets to assist applicants to more readily understand the requirements, present necessary information and aid more timely assessments.
- 7) Concurrence approval issues should not be included in SEPP or Section 117 Directions but should instead be simplified and listed as a schedule of concurrence ‘triggers’ within the EP&A Regulation.
- 8) Concurrence requirements should have a time limit imposed otherwise concurrence should be assumed. Allowances should be made for the assessment ‘clock’ to stop for certain instances which may be out of an agency’s control – e.g. native title clearance assessments.
- 9) Concurrence requirements should not be applied to development that is otherwise exempt development or complying development under the legislation or an LEP.
- 10) Concurrence responses should be managed by a central coordinating agency providing a ‘one-stop-shop’ approach for the matter. Other agencies can provide technical advice to the central coordinating agency (e.g. Department of Planning and Environment). The technical advice should be consistent with the underlying state policy and articulated state interests. All liaisons for concurrence matters should be through the one agency only.
- 11) Where agency technical advice is regarded as inconsistent with agreed state or regional planning policies (as expressed in the SEPP or regional plans), the coordinating agency (e.g. DP&E) should have the deciding power.
- 12) Regional planning must include involvement for elected members of local councils affected by the regional plans. This should occur from early in the plan making process to ensure that community visions are appropriately captured and to assist effective policy alignment between state and local preferred outcomes. Council staff should have the principal role of providing technical assistance to councillors and should not be placed in a position where they may be seen to have any over-riding influence on the policy agenda that is set e.g. on appointed regional planning taskforces or committees.
- 13) Other stakeholders should be able to be appointed to regional plan making advisory bodies by the Planning Minister as considered necessary. This should be encapsulated in the legislation in order to make such processes clearer and reduce any ambiguity over representation.
- 14) Consideration should be given to enabling the Planning Minister to establish taskforce groups to undertake any specific regional planning matters. Such taskforces could report back to a regional plan making committee appointed by the Planning Minister or the Minister directly. Taskforce members should include a cross-section of stakeholders including those that may have specific industry expertise considered to potentially be of benefit to the taskforce and the Planning Minister’s planning objectives.
- 15) There should be clarification regarding the hierarchy between different SEPPs and Section 117 Directions and the matters they deal with. This is presently confusing and inconsistent with the practice of other states. This has the potential of creating additional uncertainty for investors and the general community.

16) Consistent terminology should be used by all government departments. This is particularly the case for words that separately describe strategies and plans.

**c) *The suitability of a stand-alone regional planning act.***

Comment

- The creation of additional legislation for regional planning would do nothing to help simplify the State's regional planning framework as it would only introduce an additional level of consideration for land use planning in the state and is not supported.
- The existing state planning legislation (i.e. EP&A Act) is sufficient subject to minor changes that may be required and is the preferred approach.

Recommendations

- 1) A separate regional planning act and any separate supporting subordinate legislation should not be introduced.
- 2) The existing EP&A Act and Regulation should be the principal instruments used and amended to provide for more effective implementation of a contemporary regional planning framework.

**d) *The effectiveness of environmental planning instruments including State Environmental Planning Policies and Local Environmental Plans (including zoning) to stimulate regional development, and opportunities to improve their effectiveness.***

Comment

- The existing hierarchy of environmental planning instruments appears convoluted and ambiguous – e.g. current reference to regional plans as SEPPs; SEPPs dealing with overlapping issues affecting the assessment of development applications.
- There is a pre-disposition towards an 'environmental' reference in many of the planning instruments. While it is accepted that this is a reflection of the name and intent of the Act (i.e. ***Environmental Planning & Assessment Act 1979***) and a key social focus and priorities when the original Act came into force, this can be confusing and under-emphasise the instrument's broader land use planning intent and its ability to act as an effective regional growth instrument.

Recommendations

- 1) Amend the EP&A Act to reflect a clearer "triple bottom line" by removing reference to every other instrument as an "environmental" instrument. All plans prepared under the EP&A Act should reflect a balance of environmental, social and economic considerations as reflected in Section 5 of the Act. Plans prepared under the EP&A Act should be in relation to land use planning matters. While the environment is expected to continue to play an important role and be assessed accordingly, highlighting 'environmental' aspects for every subordinate instrument is not regarded as necessary or beneficial.

**e) *Opportunities to increase delegations for regional councils in regard to the plan making processes.***

Comment

- Generally, the plan making process is considered to be effective and provides appropriate 'checks and balances' to ensure that State planning policies are reflected in regional and local plans.

- Additional automatic ‘delegation’ to councils or Joint Regional Planning Panels could be considered for minor amendments to LEPs where such amendments are consistent with the Act and other stated planning instruments. This should also include further streamlined planning proposal requirements for minor amendments and either expedited (or removed) Gateway Decision requirements.

#### Recommendations

- 1) Consider additional delegation to councils, including JOs or Joint Regional Planning Panels for minor amendments where such amendments are consistent with the legislation including any subordinate planning instruments under the legislation (e.g. SEPPs or regional plans).

#### ***f) Opportunities for strategic planning to assist in responding to challenges faced by communities in regional areas including through Regional Plans.***

#### Comment

- Community supported strategic planning provides a robust and proactive basis for plan making and associated land use controls.
- Strategic planning in regions should help identify regional competitive advantages for development growth opportunities (see earlier comments).
- It is important to have a plan making system that actively recognises and facilitates the collaborative engagement with key stakeholder sectors in developing plans. This should include industry, non-government and community stakeholder groups as well as councils and government agencies.

#### Recommendations

- 1) Regional plans should be the principal instrument that differentiate preferred planning outcomes for the regions. A SEPP should only deal with overall state planning intents. Regional plans should be consistent with such a SEPP at all times.
- 2) Regional and local plans dealing with land use matters should have visions and objectives that articulate a preferred position for any proactive growth opportunities, infrastructure requirements, social support and community/landscape character outcomes. This should then be reflected in key themes or objectives and articulated through appropriate narratives, detailed policies, actions (with indicative timeframes where relevant) and review mechanisms. Such plans are likely to provide more effective guidance and remain contemporary in terms of the regional planning issues of the day.
- 3) Exclusion of industry stakeholders on the basis of any perceived conflict of interests is something that should be better managed as part of the plan making process. There needs to be a better balance between ensuring that vested interests do not prevail and including good corporate expertise into the plan making process so as to ensure greater success for a more robust plan.
- 4) Where specific issues and/or opportunities can be identified, an opportunity should exist for the Planning Minister to appoint specialised taskforce groups to help inform the Minister regarding regional planning processes or prepare plans. Taskforces should enable the inclusion of industry group, NGO and community representatives (see earlier comments).
- 5) Councils should be actively involved in the regional plan making process from the outset and regularly work with the Minister and government agency representatives throughout the plan making process. This should not be limited to only very short periods of review of draft documents prepared by Departmental staff.
- 6) Elected representatives from all councils affected by a proposed regional plan should have a say throughout the plan’s preparation. JOs may serve as a useful means of



providing the Minister with key priorities for inclusion in or amendment to regional plans as well as monitoring a regional plan's performance.

- 7) Regions should be clearly defined through a legislative process – i.e. defined by the Planning Minister. This is likely to reduce any ambiguity and promote stronger regional identity over time.
- 8) All regions should eventually have a contemporary, approved regional plan that includes key growth aspirations and actions.
- 9) All regional plans should be regularly reviewed each five years in terms of actions and nominal growth objectives and targets; all regional plans should be revisited at least every 5 years to account for any new economic and social circumstances.
- 10) All regional plans should identify catalyst actions for the region that are most like to help activate preferred growth and/or development and environmental/social outcomes.

***g) Opportunities for government-led incentives that promote regional development.***

Comment

- Government-led 'incentives' can often best be provided through clear articulation of development opportunities, preferred development outcomes and simplified approval processes.
- Strategic identification of catalyst actions to help stimulate or activate growth and preferred development outcomes, including expected timings, can potentially do as much for regional development planning as the provision of other incentives. This includes catalysts that may need to be State led – e.g. regional infrastructure projects.
- Assistance to establish or get access to appropriate networks (including regional infrastructure) to assist with regional development investment is also a significant way of promoting regional development. The State is already well placed and resourced to continue to coordinate this important role and way of assisting investors and regional development. Scope may exist for greater involvement from JOs as they become more established and develop the organisational capital to provide such services at a regional level complementing any similar work done by individual councils at a local government level.

Recommendations

- 1) Ensure that regional planning instruments have clear development growth visions, objectives, preferred outcomes and actions and ensure that economic development implications for land use planning decisions is a key aspect of such plans.
- 2) Ensure that regional plan templates clearly reflect and demonstrate the relationship of economic development as part of regional land use planning objectives and outcomes.
- 3) Identify and clearly articulate any catalyst actions to potentially help activate and expedite growth within the respective regions and which are likely to have any significant implications for strategic or statutory land use planning decisions.
- 4) Ensure that the State clearly demonstrates its commitments regarding any catalyst infrastructure or service improvements for the regions.
- 5) Ensure that regional planning instruments consider economic production opportunities within each region, building on existing strengths and any identifiable emerging opportunities.
- 6) Ensure that regional plans consider broader market and other opportunities as part of their respective strategic planning and do not simply focus on the region – i.e. have regard for influencing activities outside of the immediate region.
- 7) Coordinate and maintain up-to-date network information for a range of economic sectors that play key roles in the economic development of respective regions and liaise closely with key sectors to help strengthen networks, make them more efficient and effective for potential investors and in identify emerging opportunities.

- 8) Involve regional councils through the JOs to become more actively involved at regional promotion and access to economic development networks.

***h) Pathways to improve decision making processes for regional development proposals, including increasing the use of complying development, improving negotiation processes for voluntary planning agreements, and reducing costs associated with assessments.***

Comment

- Approval processes and clear regional strategic planning should complement each other in order to optimise the State's overall land use planning framework and provide for more effective sustainable regional growth.
- Providing simpler, lower levels of assessment for non-complex or 'acceptable' developments can be of benefit in helping to establish a more effective planning approvals system. Any such concessions, however, need to be clearly and simply articulated. Many of the difficulties with the planning approval system in NSW, to date, have been associated with the complexity in determining any concessions. Presently, concessions are contained in two main SEPPs (*SEPP (Exempt and Complying Development Codes) 2008* and *SEPP (Infrastructure) 2007*). These two documents alone extend over approximately 336 pages making it difficult to use let alone remember.
- LEPs also provide some concessions to the need for development consent by way of exempt or complying development provisions. Finally, other legislation exists which may influence the operation of complying development provisions – e.g. *Rural Fires Act 1997* with respect to camping on bushfire prone land. This together with the SEPPs provides numerous layers for the determination of approval concessions.
- The NSW planning system is effectively a 'prohibition-based' system. In most instances, development is assumed to be prohibited unless otherwise stated in a planning instrument. This is fundamentally different to the neighbouring state of Queensland where the opposite applies and where planning instruments are less complicated, less numerous and easier to understand. The Queensland system also more effectively applies a performance based system to proposed development. This is especially the case for development that does not meet assessment criteria for a stated level of assessment whereby any such development may still be considered as 'impact assessable' development but is also subject to appeal by an objector. Furthermore, development assessment in Queensland starts from the premise that any development is exempt unless stated in a planning instrument.
- Recent attempts to introduce significant reform (e.g. through the *2013 White Paper – A New Planning System for NSW*) have shown that significant reform is difficult to implement in NSW due to a range of political considerations and a high level of acceptance and familiarity of the existing system amongst the community.
- Exempt and complying development provisions assist in streamlining approvals for less complicated forms of development and should continue to be used and expanded. Ultimately, however, because this approach is very prescriptive, the system is likely to require significant change and improvement if genuine streamlining is to be realised over the long term.
- The risk is that NSW becomes further and further less competitive in its development approval processes compared to other states. The effects of a less efficient system are not likely to be that significant an issue in terms of NSW economic effects compared to other states due to the significantly larger overall economy of NSW. However, ultimately any comparative advantage that the state may have is likely to more quickly become eroded. This is likely to be most significantly felt around border situations and is already

being experienced along the NSW/Qld border where growth is high on the Qld side and repressed on the NSW side.

- A further significant issue confronting growth facilitation is the number of different types of approvals that are still required for the same development and separate application processes that apply under separate legislation. Other state jurisdictions have moved towards a more integrated approvals approach which minimises the different assessments and approvals that need to be sought. NSW should do the same. This could particularly be the case for the range of Section 68 approvals that are required under the *Local Government Act 1997* in addition to the need for development consent under the EP&A Act.

#### Recommendations

- 1) Continue to identify practical exempt and complying development solutions for contemporary development situations as an interim measure with a view of more fundamental reform in the longer term.
- 2) Simplify the format of exemptions and complying development provisions.
- 3) Broaden the list of exempt activities that are applicable to local governments – e.g. include depot activities.
- 4) Integrate Section 68 approvals into the EP&A Act where they apply to any development that is the subject of development consent.

#### **i) Any other issues.**

##### *Infrastructure Planning*

#### Comment

- Infrastructure planning plays a significant role in realising any plans at a regional level. Regional (rural) local councils rely heavily on regional infrastructure projects to help catalyse development, community growth and prosperity but are least well placed to contribute to funding requirements and tend to be more dependent on the State for support.

#### Recommendations

- 1) Ensure that infrastructure planning is clearly integrated into regional planning processes, including any regional plans, highlighting any catalyst infrastructure projects, their indicative timing and level of financial commitment from the State.
- 2) Investigate opportunities for private sector funding or joint ventures for regional infrastructure which may assist sustainable regional growth; consider the likely involvement of JOs as part of this process to help identify options or opportunities.

##### *Regional Involvement of or Specialist Senior Departmental Staff*

#### Comment

While the importance of the larger centres of Sydney, Hunter and Wollongong as the key economic drivers for the State and commensurate need for more resources to be used in ensuring appropriate planning controls are in place for those regions is recognised and not disputed, there is likely to be additional complementary benefit if senior Departmental officers were enabled to participate more often in planning activities and forums in other regions.

#### Recommendations

- 1) A recent impromptu visit by the State's new Chief Planner (Mr Gary White) with NOROC representatives provided a refreshing and positive approach to improved liaison between State and local councils at a non-metro regional level and should be encouraged to occur

more often in order to broaden regional relationships and understanding of planning issues.

Thank you for the opportunity to make a submission regarding this important aspect of regional development and growth. Council wishes the Standing Committee every success in making positive recommendations to Government regarding improvements to the regional planning processes in NSW and should you wish to discuss any aspect of this submission further, please do not hesitate to contact me.

Yours faithfully,

Manfred Boldy

**Executive Manager, Planning and Environment**