

Mareeba Chamber of Commerce Submission - Regional Plan

Our general comments are as follows:

Regional Vision

The Regional Vision offers little as to where the Plan seeks to place the region in 20 years time. The vision should focus as much on opportunities, and not just constraints. Whilst the vision carries little weight in itself, it does set the scene for more detailed policy formulation.

Strategic Directions

We consider it is a failing of the document that the identified strategic directions have not been arrived at without a closer analysis of regional infrastructure requirements and the impact these have on the direction of the plan and subsequent policy development. A regional infrastructure plan setting out key infrastructure priorities should have been put in place as part of the development of the Plan. Key infrastructure priorities should have been committed, so that subsequent sections of the plan (such as the preferred regional settlement pattern) could be planned with a greater degree of certainty. Failure to commitment to key infrastructure will undermine the implementation of the plan.

Regional Land Use Pattern

As far as we can ascertain, a detailed urban capacity analysis has not been undertaken to determine with any degree of certainty that there is enough available land within the defined urban footprint to accommodate anticipated growth. The analysis should have assessed the need for and availability of land for other uses, such as industry. An urban capacity analysis should also take into account the approach to be taken if some areas of the region experience high or lower growth demands than anticipated and

whether there is an opportunity to 'transfer' potential development from some areas of the region to others.

A formal urban capacity analysis should be undertaken to determine that sufficient land has been set aside within the urban footprint, taking into account the land use requirements for a full range of uses, including industrial and employment uses. The urban capacity analysis should also assess that enough urban footprint land has been identified in the locations required.

Mareeba is well placed to accommodate additional urban growth, particularly as surrounding land is relatively unconstrained (as the Regional Plan acknowledges). We consider that additional growth to that anticipated by the Regional Plan should be directed to Mareeba. We welcome the fact that Mareeba has been identified as a major regional activity centre but we consider a greater population base and economic base would help to sustain and enhance this role, particularly through facilitating a greater range of services and a diversification of the region's economic base.

Regional Policies

Natural Environment

The 'overriding need in the public interest' test should not be applied in areas outside the urban footprint. Instead, the test applied in the urban footprint ('development affecting areas of high ecological significance must be designed and operated to avoid, minimise or offset impacts') should be applied throughout the plan area, on the assumption that areas of high ecological significance carry the same weight whether they are inside or outside the urban footprint.

The onus on all local governments to identify erosion prone areas and storm tide inundation areas in their planning scheme is welcomed. This will assist developers in identifying appropriate land for development.

We are extremely concerned that no public consultation has been undertaken in relation to areas of high ecological significance, before they are finalized. Landowners are simply not aware that their land might have been identified as of ecological significance and the impacts this has in terms of policy. It appears to the Chamber of Commerce that policies relating to development in supposed areas of high ecological significance is no more than a tool to exert a greater degree of control over development than would otherwise be the case. We are particularly concerned that these areas contain land that currently has little or no ecological value and that the ecological value is therefore 'aspirational'. Policies should seek to control the actual impacts of development, not impacts on something which does not exist!

Regional Landscape and Natural Resources

Precinct Planning is a fundamentally flawed process that is only appropriate for large scale developments that are clearly of regional significance. The vast majority of development will be small to medium scale and Precinct Planning is not appropriate. The current Development Assessment process is perfectly capable of addressing the vast majority of development.

In the absence of specific guidelines, it is also difficult to assess the appropriateness of Precinct Planning. These guidelines should have been prepared and published prior to the consultation process being undertaken.

The precinct planning process (if adopted) should not specifically exclude all residential uses. There are instances when residential uses can be appropriate and are necessary to secure forms of development which are beneficial for the region. This is particularly the case for tourism related developments or other potential integrated residential developments (such as aged care facilities).

The same test should be applied to hillslope protection throughout the region. A more stringent test is applied outside the urban footprint on the assumption that these hillslope areas have the same natural and scenic value. The same test as that contained for hillslopes within the urban footprint should be applied throughout the region.

The policy regarding inter-urban breaks should be amended to make it clear that inter-urban breaks are a function of the RLRPA and should be included within it and not within the urban footprint.

The protection of Good Quality Agricultural Land is generally desirable. However, GQAL should be identified through a more systematic analysis of the qualities of the land, including not only soil types, but topography, ground conditions and the availability of water.

Strong Communities

Policy should make it clear that community engagement and consultation is not required to be more extensive than that required under the Integrated Planning Act. Policy should in no way be seen as providing a level of public consultation on development projects that goes beyond that required by the Integrated Planning Act. It is imperative that the 'not in my back yard' mentality should not prevail and good long term planning outcomes are achieved.

Urban Development

The identification and classification of Mareeba as a major Regional Activity Centre is fully supported. However, as stated above, we believe the scale of development in and around Mareeba should be increased, in order to achieve a critical mass in terms of population, services, employment provision, etc.

Other than Mt. Peter, the masterplanned areas are ill-defined in terms of timing and geographical extent. It is also questionable whether local government has the time and resources to undertake significant masterplanning exercises at the present time. A lack of clear timing will result in uncertainty and delay. Furthermore, a lack of guidance in terms of the geographical extent of Master plans will also result in uncertainty. That said, a wider ranging master planning exercise might be beneficial, not least to deliver infrastructure in a timely manner and 'lock in' state government in terms of resource commitments.

The claim that the urban footprint provides a residential land supply for the next 15 - 20 years has not been substantiated, due in large part to a lack of a urban capacity analysis. The widest possible variety of housing options should be supported, in order to provide the region with a competitive advantage in economic terms and, and this should include an element of rural residential housing.

There is no supporting evidence to substantiate the claim that a 'considerable portion' of rural residential development in the region has been undertaken on areas of good quality agricultural land and areas of high ecological significance. Existing allocations of rural residential land in local government planning schemes are claimed to provide enough supply for the whole of the plan period, yet the 'use it or lose it' provisions set out in the Regulations will mean that this supply may not be as extensive as first thought, particularly if allocations are not acted upon or consents are not implemented.

We do not agree with the underlying assertion throughout the Regional Plan that rural residential development is an inherently unsustainable form of development. Rural residential development that is carefully designed and in close proximity to existing urban areas and therefore a short driving distance from services can be sustainable. It provides a form of housing for which there is a high demand. The widest possible range of housing choices also has economic benefits, by making towns like Mareeba attractive to investors and new residents though providing types of housing not available in coastal regions and elsewhere in the

state. The Regional Plan should acknowledge that rural residential development can have positive social and economic outcomes.

Economic Development

Requirement to identify the need for and requirements for industrial land should be undertaken now and the onus should not be placed on local governments. As referred to elsewhere, this exercise should, in part at least, be undertaken as part of the regional planning process in order to ensure that the defined urban footprints have the capacity to accommodate the level of industrial development required to achieve the aims of sustaining and diversifying the regions economy.

The plan distinguishes between 'Good Quality Agricultural Land' and 'Strategically Important Agricultural Land', although is not readily evident whether the distinction has meaning in policy terms. The protection of the best and most versatile agricultural land is a worthy planning approach.

The application of minimum lot sizes within the regulations is a blunt and overly simplistic tool to control subdivision of land. The nature of changes to the industry is not known, but restrictions on minimum lot sizes will not necessarily allow for some forms of agriculture, such as more intensive agricultural production and uses, as well as other beneficial rural based uses.

The region needs to sustain and grow its reputation as a premium tourism destination. The Plan rightly points to the Great Barrier Reef and Wet Tropics World Heritage Areas as key attractions, but it misses a third key attraction – the diversity of the region. The tourism industry and peak tourism bodies have identified the need for the region to diversify its tourism offer to stay competitive. Areas such as the Tablelands offer great opportunities for tourism growth but existing facilities are lacking.

However, the plan is very much geared towards directing all but very small scale tourism development to the defined urban footprint, limiting the opportunities of rural areas to contribute towards growth and diversification. The plan is very much constraint led and does not take into account the economic realities of providing economically sustainable tourism development.

The plan states that medium to large scale tourism development can be promoted in the RLRPA through the precinct planning approach. It is a failing of the Regional Planning process that the associated guidance notes for Precinct Planning have not been published as the same time as the Plan – it is impossible to objectively assess whether a precinct planning approach is a realistic mechanism for delivering tourism development.

Infrastructure

Land use policies rightly support the investigation of renewal sources of infrastructure, such as hydro, solar and wind farms.

Water Management

The first land use policy addresses the clearing of vegetation within waterways, wetlands, etc. This is an issue controlled by the Vegetation Management Act and does not need to be replicated in the Plan.

The land use policies seek to protect potential significant water infrastructure from inappropriate development, which is desirable. However, such infrastructure also presents opportunities, providing potential recreational and tourism benefits, which should also be recognised. The Regional Plan should be more proactive in identifying new water infrastructure, such as Nullinga Dam.

The sole land use policies calls for the safety and efficiency of the water infrastructure network in existing and future rural production areas to be protected. This policy should be expanded to include reference to the protection of capacity.

Transport.

The land use policies place a clear emphasis on increasing the availability of alternative forms of transport and seeks appropriate forms of 'transport orientated communities' close to public transport nodes.

Our review questions the reliance placed on transport orientated communities when no firm commitment has been given towards the funding and implementation of major public transport infrastructure. Furthermore, we would question the workability of these policies when they are applied to smaller settlements and rural towns. The land use policies should distinguish those policies that are applied in Cairns (the major growth area) and those that can be applied elsewhere throughout the region.

In terms of the location of industry, a major component of the FNQ economy is the primary industries. These industries are located within the RLRPA, where strict control over the scale of new development and the associated sub-division of land is exercised. We agree that industries serving primary industries should be located close together – yet the associated Regulations may well prevent this.

Demand for car travel should not be managed to limit the need for future road upgrades. Road transport in its various forms (private car, freight and public transport) will continue to rely on the road network. The co-location of facilities and associated upgrading of the road network can be sustainable.

The upgrade of the Kuranda Range Road would significantly improve transport links to the northern Tablelands and, in turn, links to the Cape and Gulf regions. It would facilitate better access to markets for freight and would result in the more efficient transportation of goods and services between sub-regions. The upgrading should be brought forward in order to improve road

safety and enhance links between coastal communities and inland areas.

Implementation, Monitoring and Review

The Plan sets out monitoring and review processes but defers commitment to implementing these, timing, structure and procedures to the post adoption period. A draft formal structure should have been set out to provide the basis for comment. It is also of concern that a monitoring and review process that is rigid and inflexible will not allow the region to address emerging issues or changing circumstances in a timely fashion. This is a lesson that should have been learnt from the SEQ Regional Planning process.

Monitoring information should also be published, so that the community can make its own assessment regarding the success (or otherwise) of implementation. A formal review should be undertaken once every five years and the Ministers powers to make amendments or changes to should be increased to include matters that go beyond minor (subject to proper consultation).

Mapping

The Mareeba Chamber of Commerce is very concerned that the only detailed mapping provided during the public consultation phase was the Urban Footprint, Rural Living and RLRPA. For example, Councils and the public were not freely given detailed mapping of map 5.

Map 5 "Areas of ecological significance" has a direct implication on the net availability of land for development in the urban footprint and development proposed within the RLRPA. Many landowners in the region may not be aware that they are affected by this map and the implications of the mapping have not been made clear. This map should have been overlaid on the detailed mapping published for review.

The same could be said for Map 6.

In general, it should be made clear that this mapping is indicative, and should then state the source so those potentially affected can ascertain the status of their property.

Chapter	Policy/Notes/Maps	Comments
Regional Policies	Policy 1.1.1	The policy should be amended. There is no justification for directing ALL development to areas outside 'areas of high ecological significance', especially when the associated mapping of these areas is fundamentally flawed. As far as we understand, the mapping includes 'wildlife corridors' and potential 'revegetation areas' that currently have little or no ecological significance. Furthermore, these areas have been mapped without any form of public consultation. The relevant test applied by this policy should be 'development affecting areas of high ecological significance must be designed and operated to avoid, minimise or offset impacts, where these areas currently have ecological merit'
	Policy 1.1.4	This policy should be deleted, particularly as we consider the mapping in Map 5 is flawed.
	Policy 1.3.3	The policy should be amended to include the wording 'or other appropriate measures'. Buffer distances are not the only way of controlling impacts and other mechanisms should not be excluded.
	Policy 2.1.1	The policy should recognize the value of the landscape for economic activities (such as tourism)

	Policy 2.2.1	The policy should not preclude residential development, which may be appropriate as part of a wider integrated development.
	Policy 2.2.4	This policy should be deleted as some forms of residential development may be acceptable.
	Policy 2.4.2	Policy tests should be the same for all development, on the assumption that comparable hillslopes throughout the region have the same value, whether they are within the urban footprint or not. The appropriate test is the one set out for areas within the urban footprint and this should be applied throughout the region.
	Policy 2.4.7	The policy should make it clear that inter-urban breaks are expected to be provided within the RLRPA and not the urban footprint.
	Policy 3.4.1	Measures to ensure community engagement are already included within the Integrated Planning Act. The policy should be amended to make it clear that additional levels of community consultation over and above that provided for in the IPA will not be required.
	Policy 3.4.2	Measures to ensure community engagement are already included within the Integrated Planning Act. The policy should be amended to make it clear that additional levels of community consultation over and above that provided for in the IPA will not be required.
	Policy 4.1.1	The policy should be amended to state 'The majority of urban growth....'. The policy will then recognize and allow for a limited amount of urban growth outside the urban footprint, such as tourism development, rural industry, limited residential development, etc.

	Section 4.4	A new land use policy should be added which states that additional land for development will be identified and released if existing supply is inadequate to meet demand or assumptions regarding the capacity of urban areas to accommodate anticipated growth is underestimated.
	Policy 4.6.1	We have concerns that the overall approach the plan is taking towards rural residential development will ultimately restrict supply to the extent that price will be driven up which in turn will result in the acquisition of larger lots of rural land for rural residential purpose. Rural residential development remains in strong demand and seeking to cut supply will have potentially damaging economic and environmental impacts. Instead, the plan should seek to manage rural residential development, releasing land where necessary.
	Section 4.6 Explanatory notes	It should be recognized that some areas of rural residential development are well connected to existing urban areas (this is the case around Mareeba) and as such the impacts cited do not necessarily arise. We also question the impact that rural residential development has on service provision, especially where developers are required to provide a full range of services as part of any development under current planning schemes. The Regional Plan should also recognise that rural residential development can be an important economic driver, by providing a greater range of housing choices in rural towns such as Mareeba which in turns, ensures the town remains competitive in attracting inward investment and retaining population and services.

	Policy 5.1.2	Delete reference to residential development.
	Section 5.1	Include a land use policy that supports the growth of Mareeba Airport as a major regional aviation facility.
	Policy 5.5.1	Delete policy. Carefully designed and planned tourism development can occur in areas of high ecological importance without adverse impacts.
	Policy 5.5.2 (b)	Delete policy.
	Policy 5.5.3	Refer to general comments on Precinct Planning and propose changes to the Regulations. Precinct Planning is only appropriate for large scale developments that are of true Regional significance in their own right.
	Policy 6.4.2	The policy should be amended to avoid the location of landfills within and immediately adjacent to residential areas.
	Policy 7.1.1	Substitute the word 'avoided' with 'minimised'.
	Section 7.3	The Regional Plan should be more proactive in terms of identifying key water infrastructure priorities, such as the Nullinga Dam. It is important that water storage capacity is secured to ensure that the regions growth is not unduly restricted by a lack of supply. The Regional Plan should clearly support the provision of Nullinga Dam.
	Policy 7.6.1	The policy should be amended to include reference to the safety and efficiency and CAPACITY of the water infrastructure network.