

BALLINA SHIRE COUNCIL

ATTACHMENT TO ITEM 9.1

BALLINA SHIRE GROWTH MANAGEMENT STRATEGY

Ordinary meeting 26/7/12

Attachment 1 - Public submissions

| Submission No. | Submission |
|-----------------------|--|
| 1 | Ardill Payne & Partners on the behalf of the Porter Family |
| 2 | Ashwood & Bryant |
| 3 | Ballina Environment Society |
| 4 | Marelle Lee, Resident of Lennox Head |
| 5 | Planning Resolutions Pty. Ltd. on the behalf of the development proponents for Cumbalum Precinct B |
| 6 | Simon Prendergast on the behalf of Terry and Sue Predergast |
| 7 | Newton Denny Chapelle on the behalf of Tabalon Pty. Ltd. |

ARDILL PAYNE & PARTNERS

Civil & Structural Engineers - Project Managers - Town Planners - Surveyors
ABN 51 808 558 977



WE Payne BE, MIE Aust ET Elford L&ESD TJ Cromack B.Tech (Eng), TMIE Aust PM Snelgrove BTP

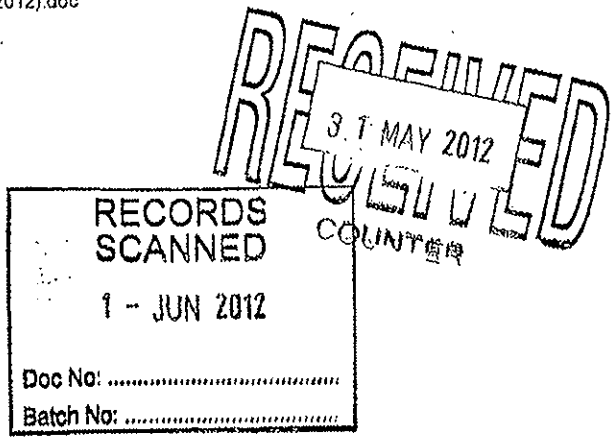
7227 Submission to Draft Growth Management Strategy (May 2012).doc

30 May 2012

The General Manager
Ballina Shire Council
PO Box 450
BALLINA NSW 2478

Attn: Strategic Services Group

Dear Sir/Madam



re: **Draft Ballina Shire Council Growth Management Strategy (May 2012)**

Ardill Payne & Partners has been commissioned by the Porter Family to prepare a submission to Council in respect of the Draft Growth Management Strategy (DGMS) that is on public exhibition until the 1st June 2012.

This submission relates particularly to land described as Lot 13 DP 1059499, No. 853 Bruxner Highway, Wollongbar. The land is:

- currently zoned 7(i) – Environmental Protection (Urban Buffer) Zone under the BLEP 1987
- proposed to be zoned E3 – Environmental Management Zone under the provisions of the Draft BLEP 2011

The long-standing urban buffer requirements for both Alstonville and Wollongbar are acknowledged. However, since the construction and opening of the Alstonville By-pass, the character of and requirement for the urban buffer to the villages has been modified.

This new road has altered the character of the locality and has potential implications for the urban buffer. As you will note from aerial photographs of the area, the residential component of Wollongbar is now bounded to the south and physically separated from the industrial estate by a major section of road infrastructure.

The road has resulted in total physical and spatial separation of the village of Wollongbar (houses, shops and open space) from the industrial estate and thus it is submitted that the urban buffer is appropriate around the village, rather than the industrial estate, which is now effectively a stand-alone area that is no longer part of the village.

79 Tamar Street
PO Box 20
BALLINA NSW 2478

Phone: 02 6686 3280
Fax: 02 6686 7920
e-mail: info@ardillpayne.com.au

As will be articulated in this submission, it is submitted that it would be timely and appropriate to investigate the incorporation of this land into the DGMS as a 'strategic urban growth area'.

This would enable further future investigation of the potential for the land to be considered through the statutory rezoning process, with a mind to it being rezoned and developed as an effective expansion of the Russellton Industrial Estate (RIE).

Council would appreciate that the RIE is almost completely developed, with only a limited supply of vacant land remaining. The RIE is ideally located in that it is:

- effectively half-way between Ballina and Lismore
- proximate to both Alstonville and Wollongbar
- has good and convenient access to the Bruxner Highway
- has improved local and regional access as a consequence of the opening of the Alstonville By-pass

It is submitted that additional stocks of industrial land are required to service the existing local and regional population as well as the impending increase in population that will result from the Wollongbar Urban Expansion Area. Increased land stocks will also provide for increased competition in the market place and will provide land for new businesses to be established in the local area (providing increased employment opportunities and economic stimulus).

The Porters commissioned Foresight Partners Pty Ltd (Property Market Analysis and Development Strategies) to undertake an industrial land use review for the Plateau Villages, which supplements and updates the "Ballina Shire Industrial and Commercial Land Use Review" (GeoLINK 2008). A copy of the Foresight report is attached, which concluded that:

"...the designation of the subject site for industrial uses represents a logical and prudent economic and land use outcome, and one that would not jeopardise the intended function of the site as an urban buffer between Wollongbar and Alstonville. It represents, in effect, an extension and strengthening of the well-established Russellton Industrial Estate as a generator of employment and contributor to Ballina's broader economy. Given the historic take-up evident for this area (prior to the GFC), it is likely to be needed to meet future demand in the medium to longer term, rather than in the short term. However, it is good economic planning to designate and preserve adequate industrial land supplies well in advance of demand."

As Council will note, the subject land adjoins the eastern boundary of the RIE. Preliminary planning investigations have confirmed that the land would be well suited to future urban (and possibly industrial) development due to the fact that it is:

- relatively gently sloping
- effectively cleared and is devoid of significant native vegetation (predominantly pasture land with a small section of horticulture at its southern end)
- not mapped as being subject to the 1 in 100 year flood event
- not mapped as being subject to acid sulfate soils
- not subject to coastal processes
- not mapped as being bushfire prone
- able to be economically and practically serviced via the extension of the existing public road system with good access opportunities to the Alstonville By-pass and the Bruxner Highway
- able to be economically and practically serviced with necessary public infrastructure
- able to be readily and practically accessed by and connected to the existing public road network via Dulcet Lane and/or a future road connection over Lot 6 DP 258150, Owens Crescent, Russellton (which is owned by the Porter family)
- not adjoined by or proximate to any residential or rural residential zones or areas
- not adjoined by or proximate to any dwelling houses (other than the dwelling on the property)
- not identified as containing or adjoining any item or place of heritage significance

Having regard to the above and in particular to the findings of Foresight, it is submitted that it would be sound strategic and economic planning to have the land identified as a potential 'strategic urban growth area' in the DGMS. As Council would appreciate, this would not infer any right for the land to be rezoned to urban purposes, rather it provides an ability for it to be considered at some future stage in a strategic context.

Having regard to the above, it is respectfully requested that Council consider including Lot 13 into the DGMS as a 'strategic urban growth area'.

Yours faithfully



Paul Snellgrove
ARDILL PAYNE & PARTNERS

Proposed Industrial Estate, Wollongbar

Economic Impact Assessment

Prepared for
Tabalon Pty Limited

23 December 2011
11023 Rev 0

CONTENTS

| | |
|--|-----------|
| CONTENTS | 1 |
| SUMMARY | 1 |
| 1 INTRODUCTION | 3 |
| 1.1 Subject site | 3 |
| 1.2 Methodology | 4 |
| 2 OVERVIEW OF BALLINA SHIRE | 5 |
| 2.1 Population | 5 |
| 2.1.1 Ballina Shire's population | 5 |
| 2.1.2 Population in Alstonville-Wollongbar | 6 |
| 2.2 Employment | 7 |
| 2.2.1 Containment rates | 7 |
| 2.2.2 Employment by Industry | 8 |
| 2.3 Summary and Implications | 9 |
| 3 INDUSTRIAL LAND OVERVIEW | 10 |
| 3.1 Current supply | 10 |
| 3.1.1 Southern Cross Industrial Estate | 10 |
| 3.1.2 Russellton Estate | 12 |
| 3.1.3 Smith Drive | 12 |
| 3.1.4 Other industrial areas | 12 |
| 3.2 Recent sales activity | 13 |
| 3.3 Summary and implications | 14 |
| 4 INDUSTRIAL LAND DEMAND | 16 |
| 4.1 Ballina Shire | 16 |
| 4.2 Alstonville-Wollongbar | 18 |
| 5 ECONOMIC AND COMMUNITY NEED AND IMPACTS | 19 |
| 5.1 Supply – demand balance and future need | 19 |
| 5.2 Potential impacts and benefits | 20 |

Prepared by

Foresight
PROPERTY CONSULTANTS

ABN 60 611 510 021

Suite 31 Level 4
50-56 Sanders Street
LIPPERIDGE GRAVATT
QLD 4122

P: (07) 3422 2041
F: (07) 3422 9889
www.foresightpartners.com.au

Executive Summary

The purpose of this report is to provide a summary of the findings of the research conducted for the Ballina Shire Council. The research was conducted to identify the key issues and challenges facing the Shire and to provide recommendations for the Council to address these issues.

The research was conducted through a series of interviews with Council staff and community members, as well as a review of relevant documents and data. The findings of the research are presented in this report, along with recommendations for the Council to address the identified issues and challenges.

The research identified several key issues and challenges facing the Shire, including a need for improved infrastructure, a need for better services, and a need for more jobs. The research also identified several opportunities for the Shire, including the potential for tourism, the potential for new industries, and the potential for improved infrastructure. The recommendations in this report are based on the findings of the research and are intended to provide the Council with a clear and concise summary of the key issues and challenges facing the Shire, and to provide recommendations for the Council to address these issues and challenges.

LIST OF FIGURES

| | |
|--|----|
| Figure 1.1: Subject site and Russellton Estate | 3 |
| Figure 2.1: Components of Population Growth, Ballina Shire 2011 to 2031 | 6 |
| Figure 3.1: Median prices (\$/m ²) of vacant industrial land, 2000 to 2010 | 14 |

LIST OF TABLES

| | |
|--|----|
| Table 2.1: Estimated Resident Population, Ballina Shire 2011 to 2031 | 5 |
| Table 2.2: Containment rates for Ballina Shire, 2006 Census | 7 |
| Table 2.3: Industry of Employment by Place of Work, 2006 | 8 |
| Table 3.1: Industrial land supply Ballina Shire by industrial estate, 2011 | 10 |
| Table 3.2: Summary of sales of vacant Industrial zoned land, Russellton Estate, 2000 to 2010 * | 13 |
| Table 4.1: Ballina Shire employment projections and required industrial land to 2031 | 17 |

SUMMARY

Tabalon Pty Limited has identified an opportunity to provide land for future industrial development and employment in the Alstonville-Wollongbar area. The subject site is located on the southern side of the recently completed Bruxner Highway Bypass near Wollongbar and adjoins the Russellton Industrial Estate. Tabalon Pty Ltd is seeking to designate and reserve this strategic site for future industrial uses over the medium to longer term.

The purpose of this report is to examine the potential community need and economic impact of the site's future development for industrial purposes.

Population and employment

- The population of Ballina Shire is projected to increase over the next 20 years to reach 53,800 persons by 2031, with most of the population increase in the older age groups rather than in the working age group.
- The town of Alstonville is expected to show little population growth, however the population of Wollongbar is expected to increase (by around 2,500 people) as the Wollongbar Urban Expansion Area is developed. This increase in population will drive demand for additional industrial activity and employment opportunities locally and Shire-wide.
- As at 2006, around 36% of employed Ballina residents travel outside the Shire for employment. Overall, the total number of jobs in Ballina Shire is lower than the number of employed residents. This could indicate a lack of adequate employment opportunities within Ballina Shire.

Industrial land supply

- There is currently an estimated 46.8ha of vacant industrial zoned land within Ballina Shire – 22.4ha in Southern Cross Industrial Estate, 13.1ha in Russellton Estate, 8.1ha at Smith Drive and 3.2ha at Boat Harbour Road.
- However, some of this land is constrained:
 - Approximately 10ha in Southern Cross Industrial Estate has been designated in the *Southern Cross Precinct Masterplan* as a bulky goods precinct; and
 - 8.1ha of land in the Russellton Estate is comprised of three large steep lots.
- Consequently, the effective supply of vacant land for industrial purposes within these two major estates is estimated at about 17.4ha (net) – 5ha in Russellton Estate and 12.4ha in Southern Cross.
- Russellton Estate is a distinct industrial estate, different to the other industrial estates within Ballina. It is the only industrial estate outside Ballina township and it shows a price advantage over the other areas.

Industrial land demand

- Previous work undertaken for Council in 2008 concluded that there was a sufficient supply of industrial zoned land to meet anticipated future demand. Foresight Partners used a similar methodology, based on employment forecasts and average employment densities, to verify and update these forecasts.
- The land demand requirements for Ballina Shire calculated by Foresight Partners were slightly lower than previous estimates. Foresight Partners estimated an additional 7.2ha of industrial land (net) would be required between 2011 and 2021, and 12.9ha (net) between 2011 and 2031. However, this methodology is likely to understate the land demand and therefore forms a 'base case' scenario.
- Land demand projections for the Alstonville-Wollongbar area were estimated using historical sales of vacant land as a proxy for historical take-up. In the pre-GFC years from 2001 to 2007 an average of 0.70ha of vacant industrial land per year was sold. Assuming demand for 0.7ha of net industrial land per year, a total of 14ha of net industrial land would be required in (or near) the Russellton Estate area over the next 20 years. The supply of vacant and underdeveloped land which is unconstrained is 7.7ha, which only represents an 11 year supply.

Economic and community need and impacts

- Although the current industrial land supply-demand balance in Ballina Shire overall would appear capable of meeting future land demand for some years, there are other factors and considerations that suggest a need for augmenting the future supply of industrial land in the Alstonville-Wollongbar area.
- The industrial areas on Smith Drive and Boat Harbour Road are quite different to the other industrial estates and should be treated differently or discounted with respect to meeting future need and demand for industrial land within Ballina Shire. Similarly, demand for lots in the Southern Cross and Russellton estates would also vary over time, and their appeal would vary among potential users.
- Historic (pre-GFC) land demand or take-up, as indicated by vacant land sales in Alstonville-Wollongbar, suggests that there is likely to be a need for additional industrial land in this area. Unconstrained vacant and underdeveloped land supply represents about an 11 year supply.
- The designation of the subject site for industrial uses represents a logical and prudent economic and land use outcome, and would not jeopardise the intended function of the site as an urban buffer between Wollongbar and Alstonville. It represents an extension of the well-established Russellton Industrial Estate as a generator of employment and contributor to Ballina's broader economy.
- Given historic take-up evident for this area (prior to the GFC), it is likely to be needed to meet future demand in the medium to longer term, rather than in the short term. However, it is good economic planning to designate and preserve adequate industrial land supplies well in advance of demand.

1 INTRODUCTION

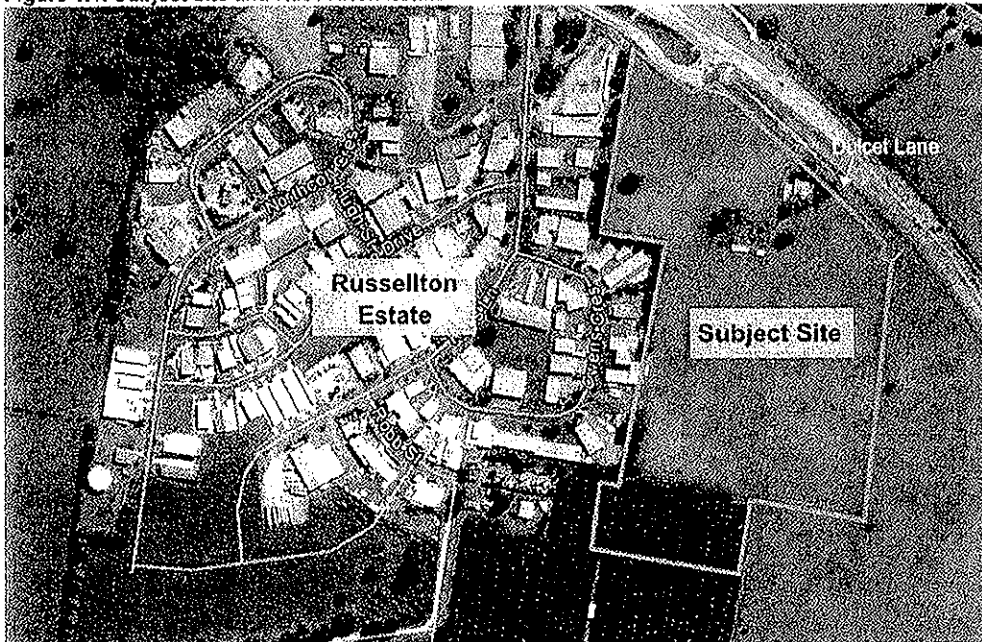
Tabalon Pty Limited has identified an opportunity to provide land for future industrial development and employment in the Wollongbar–Alstonville area. The subject site is 14 Dulcet Lane Wollongbar – formally known as Lot 13 DP 1059499 – and is located on the southern side of the recently completed Bruxner Highway Bypass, adjoining the Russellton Industrial Estate. It is currently designated as part of the 'Environmental Protection – Urban Buffer' area under the Ballina Shire Combined Development Control Plan.

Tabalon Pty Ltd is seeking to designate and reserve this strategic site for future industrial uses over the medium to longer term.

The purpose of this report is to examine the potential community need and economic impact of the site's future development for industrial purposes. The report examines supply of industrial land within the Council area, potential demand for industrial land and an assessment and discussion regarding the need for this development and its likely impact and contribution to Ballina's future industrial land supply and employment.

1.1 Subject site

Figure 1.1: Subject site and Russellton Estate



The site of the proposed industrial estate is south of the Bruxner Highway between Wollongbar and Alstonville, and is adjacent to the existing Russellton Estate. The total site area is 12.53ha and initial designs suggest that up to 50 lots totaling approximately 8.6ha in a range of lot sizes can be provided.

There would be road access to the proposed estate from Dulcet Lane, as well as from Owens Crescent through a 2,155m² lot owned by the proponent.

1.2 Methodology

In preparing this economic need and impact assessment for the proposed industrial estate at Wollongbar the following activities have been undertaken:

- a site visit and reconnaissance of existing industrial land and industrial uses in Ballina's industrial areas, including an estimation of occupied and vacant available industrial land;
- a review of existing relevant documents such as Council's 2008 Industrial and Commercial Land Use Review (prepared by GeoLink);
- discussions with Ballina Shire Council regarding other recent proposed industrial developments in the area;
- discussions with real estate agencies active in Ballina's industrial market to help assess historic and more recent market demand (looking beyond current difficult economic conditions);
- demographic analysis of the Ballina Shire population, together with an analysis of its working population and usual resident population data from the 2006 Census;
- evaluation of forecast demand for, and supply of, industrial land in the Ballina area generally, and the Alstonville-Wollongbar area specifically, based on fieldwork and an analysis of vacant industrial land sales and take-up over the past several years; and
- evaluation of the economic benefits and community need for additional zoned industrial land on the proposed site.

2 OVERVIEW OF BALLINA SHIRE

Population growth is a key driver of industrial activity and employment in an area and of demand for industrial land. This section examines population growth and employment by industry sector for Ballina Shire.

2.1 Population

2.1.1 Ballina Shire's population

As at June 2011 the Estimated Resident Population of Ballina Shire was approximately 43,000 persons (Table 2.1). The population is projected to increase at an average annual rate of 1.1% per year over the next 20 years, to reach 53,800 persons by 2031. This represents a total increase of 10,800 persons – an average of 540 per year.

Table 2.1: Estimated Resident Population, Ballina Shire 2011 to 2031

| | 2011 | 2016 | 2021 | 2026 | 2031 | Increase 2011 to 2031 |
|--------------------------|--------|--------|--------|--------|--------|-----------------------|
| Population | 43,040 | 45,777 | 48,530 | 51,252 | 53,834 | 10,794 |
| Population aged 15 to 64 | 26,844 | 27,734 | 28,305 | 28,877 | 29,505 | 2,662 |
| % aged 15 to 64 | 62.4% | 60.6% | 58.3% | 56.3% | 54.8% | |

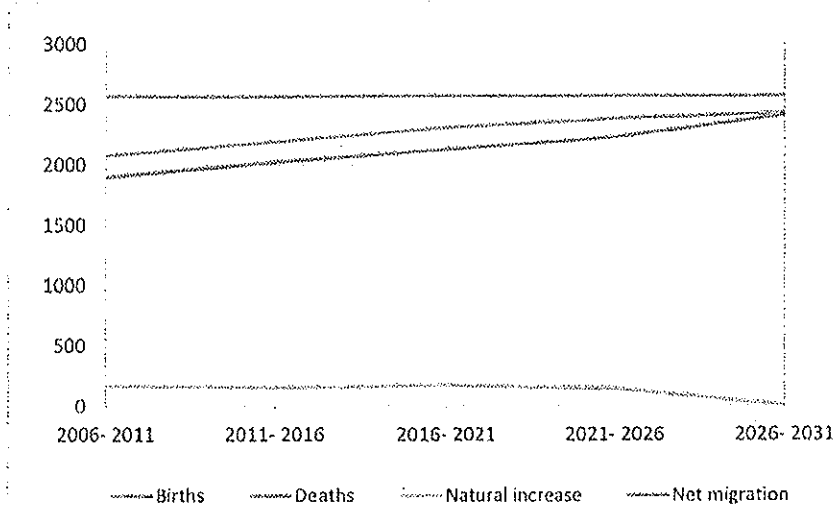
Source: NSW Government Department of Planning

The working age population, as defined by the Australian Bureau of Statistics¹, is 15 to 64 years. The number of people in this age group in Ballina Shire is forecast to increase over the next 20 years, but at a slower rate than the total population. The slower rate of growth in the population aged 15 to 64 years reflects an ageing population.

Figure 2.1 shows the components of population growth. It is expected that net migration will continue to account for most of the population growth, with natural increase remaining low (and decreasing towards 2031). This is consistent with the whole Richmond-Tweed Statistical Division, but in contrast with the whole of NSW where the increase in population growth due to natural increase exceeds population growth from migration.

¹ ABS (2011), *Population by Age and Sex, Australian States and Territories, Jun 2010*, Cat. No. 3201.0

Figure 2.1: Components of Population Growth, Ballina Shire 2011 to 2031



Source: NSW Government Department of Planning

2.1.2 Population in Alstonville-Wollongbar

The most recent data available for the towns of Wollongbar and Alstonville is from the 2006 Census. As at 2006 (based on the Australian Bureau of Statistics Urban Centre Locality boundaries) there were:

- 1,846 usual residents and 758 private dwellings in Wollongbar; and
- 5,006 usual residents and 2,239 private dwellings in Alstonville.

Together these two towns accounted for 17.8% of all usual residents within the Ballina Shire as at 2006.

There are no population projections available at the town level for Wollongbar or Alstonville. Discussions with Council representative and planners suggest that there is not likely to be much increase in Alstonville's population. However, Wollongbar could show large population increases. The *Ballina Shire Development Control Plan No. 15* outlines a plan for the Wollongbar Urban Expansion Area (WUEA) situated immediately to the north of Wollongbar.

The Control Plan states that "the future population of Wollongbar is set to increase significantly over the next decade, as and when land within the WUEA is subdivided and developed for residential purposes". It is estimated that the expansion area will achieve a final resident population in the order of 2,337 to 2,918 persons².

With the expansion, the population of the Alstonville-Wollongbar area could increase to around 10,000 people once fully developed.

² Ballina Shire Council (2006), *Ballina Shire Combined Development Control Plan*

2.2 Employment

2.2.1 Containment rates

Labour force containment and job containment rates, based on data from the 2006 Census, can be used to give an indication of the number of jobs compared to employed residents or 'job self-sufficiency' of a region. These two different containment rates have been calculated for Ballina Shire.

Labour force containment is the proportion of the Shire's employed residents who are working within the Shire. It is calculated by dividing the number of people who live and work in Ballina Shire by the total number of employed residents in the Shire.

Job containment refers to the proportion of jobs in Ballina Shire that are undertaken by residents of the Shire (rather than people who travel in from other areas). It helps to measure the proportion of non-resident workers in an area. Ballina Shire's job containment rate is calculated by dividing the number of people who live and work in Ballina Shire by the total number of jobs in Ballina Shire.

The two measures are often confused but the fundamental difference is that labour force containment focuses on Ballina Shire's labour force and where they travel to work, while job containment focuses on jobs within Ballina Shire and where people travel from.

Job containment and labour force containment rates for the industrial sectors are shown in Table 2.2 below.

Table 2.2: Containment rates for Ballina Shire, 2006 Census

| | <i>Total no. jobs</i> | <i>No. people who live and work in Ballina</i> | <i>No. employed residents</i> | <i>Job containment</i> | <i>Labour force containment*</i> |
|--------------------------------------|-----------------------|--|-------------------------------|------------------------|----------------------------------|
| Total for Ballina Shire | 12,701 | 10,004 | 16,220 | 79% | 64% |
| Industrial sectors average | 2,689 | 1,988 | 3,634 | 74% | 57% |
| - Manufacturing | 816 | 590 | 1,025 | 72% | 60% |
| - Elec., Gas, Water & Waste Services | 90 | 62 | 121 | 69% | 53% |
| - Construction | 952 | 718 | 1,477 | 75% | 51% |
| - Wholesale Trade | 497 | 362 | 559 | 73% | 66% |
| - Transport, Postal & Warehousing | 334 | 256 | 452 | 77% | 60% |

* People who did not state their place of work were excluded from the calculations of labour force containment

Source: Foresight Partners calculations based on ABS 2006 Census data

Labour Force Containment

In 2006 the labour force containment rate for Ballina Shire was 64%. This means that of the 16,220 Ballina residents who were employed, 64% worked within the Shire (around 10,000 people), while 36% travelled outside the Shire to work. In our experience elsewhere this seems to be a relatively low labour force containment rate for a large area, and could potentially indicate a lack of adequate employment opportunities in the Ballina Shire relative to large towns nearby.

Labour force containment does, however, vary by sector. Labour force containment rates were lower for most industrial sectors (apart from Wholesale Trade), averaging 57%. A

lower labour force containment rate means that a higher proportion of people working in these sectors travel outside the Ballina Shire for work. Low labour force containment levels are not uncommon for Construction work (where most workers must travel to construction sites), but less so for other industry sectors.

Job Containment

Ballina Shire displayed a job containment rate of 79%. That is, local residents occupied four out of every five jobs as at the 2006 Census. Around 10,000 local residents filled jobs while around 2,700 persons living outside Ballina Shire reported that they travelled to the Shire to work. Job containment also varies by sector. Job containment was lower for industrial sectors, averaging 74%.

2.2.2 Employment by Industry

The industry of Employment for people working in the Ballina Shire as at 2006 is summarised in Table 2.3. The broader Richmond-Tweed Statistical Division is also provided as a benchmark.

Industrial sectors include Manufacturing, Electricity, Gas, Water and Waste Services, Construction, Wholesale Trade, Transport, Postal and Warehousing and the Repairs and Maintenance component of 'Other Services'. The proportion of employees in Ballina Shire working in these industrial sectors in total was 23.2% as at the 2006 Census, which is similar to the 23.7% for the broader region. There are some differences, however, across sectors. In Ballina Shire there is a lower proportion of people employed in Manufacturing and a higher proportion employed in Construction and Wholesale Trade.

Table 2.3: Industry of Employment by Place of Work, 2006

| <i>Industry of Employment (ANZSIC06)</i> | <i>Ballina Shire</i> | <i>Richmond-Tweed Statistical Division</i> |
|---|----------------------|--|
| Agriculture, Forestry and Fishing | 6.8% | 6.1% |
| Mining | 0.2% | 0.2% |
| Manufacturing | 6.5% | 7.7% |
| Electricity, Gas, Water and Waste Services | 0.7% | 0.8% |
| Construction | 7.6% | 6.5% |
| Wholesale Trade | 4.0% | 3.5% |
| Retail Trade | 16.5% | 15.6% |
| Accommodation and Food Services | 9.0% | 9.2% |
| Transport, Postal and Warehousing | 2.7% | 3.2% |
| Information Media and Telecommunications | 1.0% | 1.5% |
| Financial and Insurance Services | 2.4% | 2.1% |
| Rental, Hiring and Real Estate Services | 2.4% | 2.0% |
| Professional, Scientific and Technical Services | 5.3% | 4.5% |
| Administrative and Support Services | 2.3% | 2.2% |
| Public Administration and Safety | 5.7% | 5.3% |
| Education and Training | 9.3% | 9.7% |
| Health Care and Social Assistance | 12.4% | 14.3% |
| Arts and Recreation Services | 1.5% | 1.4% |
| Other Services | | |

| <i>Industry of Employment (ANZSIC06)</i> | <i>Ballina Shire</i> | <i>Richmond-Tweed Statistical Division</i> |
|--|----------------------|--|
| - Personal Services | 2.0% | 2.1% |
| - Repairs and Maintenance | 1.8% | 2.0% |
| Total persons | 12,701 | 73,582 |
| % in industrial sectors* | 23.2% | 23.7% |

* Industrial sectors include Manufacturing, Electricity, Gas, Water and Waste Services, Construction, Wholesale Trade, Transport, Postal and Warehousing and the Repairs and Maintenance component of 'Other Services'.

Source: ABS 2006 Census based on Place of Work

2.3 Summary and Implications

- The population of Ballina Shire is projected to increase over the next 20 years to reach 53,800 persons by 2031, with a higher proportion of the population increase in the older age groups rather than in the working age group. The population growth is expected to reflect migration rather than natural increase.
- The town of Alstonville is expected to show little population growth, however the population of Wollongbar is expected to increase as the Wollongbar Urban Expansion Area is developed. The population of the Alstonville-Wollongbar area could increase from about 6,850 persons in 2006 to about 10,000 people within the next 10 to 15 years. This increase in population will drive demand for additional industrial activity and employment opportunities locally and Shire-wide.
- As at 2006, around 36% of employed Ballina residents travel outside the Shire for employment. Overall, the total number of jobs in Ballina Shire is lower than the number of employed residents. This could indicate a lack of adequate employment opportunities within Ballina Shire.
- The proportion of employees in Ballina Shire working in industrial sectors in total was 23.2% as at the 2006 Census, which is similar to the 23.7% for the broader Richmond-Tweed region.

3 INDUSTRIAL LAND OVERVIEW

This section provides an overview of industrial land in Ballina Shire for each major industrial estate. Estimates of total and vacant industrial zoned land are provided for each estate. This section also includes an analysis of vacant land sales activity.

3.1 Current supply

The current supply of vacant industrial land was determined based on a field inventory undertaken by Foresight Partners in October 2011 and updates the vacant supply presented in GeoLink's 2008 *Ballina Shire Industrial Land Use Review*. Total industrial land supply and vacant and underdeveloped land is summarised for each estate in Table 3.1. The estate/area names align with those used in the 2008 GeoLink report.

Table 3.1: Industrial land supply Ballina Shire by Industrial estate, 2011

| | Southern Cross | Russelton* | Smith Drive | Clark Street | Boat Harbour Road | Ballina Airport Site | West Ballina | TOTAL |
|-----------------------------|----------------|------------|-------------|--------------|-------------------|----------------------|--------------|-------|
| Total Industrial zoned land | 77.3 | 43.8 | 15.5 | 6.4 | 6.3 | 3.1 | 1.8 | 157.3 |
| Vacant | 22.4 | 13.1 | 8.1 | - | 3.2 | - | - | 46.8 |
| Underdeveloped | 0.8 | 2.7 | - | - | - | - | - | 3.5 |
| Total vacant/underdeveloped | 23.2 | 15.8 | 8.1 | - | 3.2 | - | - | 50.3 |

* Note that of the 13.1ha of vacant industrial land in the Russelton Estate, there are two large lots and one proposed lot that are relatively steep and account for 8.1ha. This means that of the 13.1 ha of vacant land approximately 5ha are relatively unconstrained by topography.

Source: Geolink (2008) *Ballina Shire Industrial and Commercial Land Use Review* and Foresight Partners estimates based on field inventory

For the entire Ballina Shire there is an estimated 157ha of land zoned '4 - Industrial' under the Ballina 1987 LEP (*Ballina Shire Industrial and Commercial Land Use Review*). Of this, 46.8ha was vacant as at October 2011, and an additional 3.5ha were classified as underdeveloped (includes land with some materials such as pipes and skip bins but no buildings and not used intensively, the bridge club in Ballina, and the tennis courts at Wollongbar). Therefore there is 50.3ha of industrial zoned land potentially available within the shire to be used for industrial purposes.

3.1.1 Southern Cross Industrial Estate

Southern Cross Industrial Estate is the largest industrial estate within the Shire, with 77ha of industrial zoned land. It is located within Ballina township, to the north of the town centre. Southern Cross Estate contains a variety of businesses ranging from small population serving businesses such as self-storage, mechanics, hail damage repairers, air conditioning, electrical and plumbing businesses, to larger businesses such as concrete batching plants, Norfolk Relocatable Homes and Australian Reinforcing Company.

Southern Cross Estate contains the most vacant industrial land of all the estates, with 22.4ha and 0.8ha of underdeveloped land. As at October 2011, 19 lots within the estate were classified as vacant. Most of these lots were small subdivided lots, but there was also a large lot at the north of the estate on which the Harvey Norman centre is located, which had a large vacant portion.

There are some land uses within Southern Cross Estate that are not industrial. This includes the Harvey Norman centre (pictured), other retail uses scattered throughout the estate (example pictured), the bridge club, the RSL youth club and a church.



The bulky goods retail centre containing Harvey Norman, Spotlight, Forty Winks and Pillow Talk has recently been developed within the Southern Cross Industrial Estate in Ballina. This land no longer forms part of the industrial land supply and the development is likely to constrain or limit the future use of adjoining vacant industrial land for at least some industrial purposes. Retail uses could discourage some industrial activities from locating adjacent or nearby, particularly for industrial firms generating significant truck movements. The retail uses can exert further pressure to use adjoining industrial land for non-industrial purposes.

This whole area (the Harvey Norman Centre and the vacant land adjacent) is zoned for industrial uses but in the *Southern Cross Precinct Masterplan*, which was adopted by Council in February 2008, the area has been designated as a 'Bulky goods retail precinct'. Given this it is unlikely that it will be used for industrial purposes. This area accounts for approximately 10ha of the current vacant industrial land supply. If this land is not available for industrial uses in the future, the vacant industrial land supply within Southern Cross Estate is effectively reduced to around 12.4ha.

The *Southern Cross Precinct Masterplan* does, however, also outline an area to the north-east of the Southern Cross Estate to be designated as a future industrial area. This future precinct of approximately 19.5ha (pg. 26 of the Masterplan) will ensure the Southern Cross Estates' continued primacy, although the useable or net allotment area achievable in this precinct is uncertain.

3.1.2 Russellton Estate

Russellton Estate is located south of Wollongbar and is the second largest industrial estate within Ballina Shire, with 34.8ha of industrial zoned land. Russellton Estate contains some population serving businesses including auto repairers, construction businesses and self-storage. There are also some larger businesses including a freight company, Orion Blinds and Duraplas tank manufacturing.

Of the 43.8ha of industrial land, 13.1ha was vacant as at October 2011 and an additional 2.7ha was classified as underdeveloped (totalling 15.8ha). Some of the vacant land within the Russellton Estate is relatively steep and these areas are likely to remain as large lots, either requiring significant earthworks or with restricted use areas. There are two large existing lots that may be constrained due to steepness and one lot to be developed in the last stage of Council's estate. These three lots account for 8.1ha of the 13.1ha of vacant land in the estate. While this area forms part of future supply, the useable area, (and some uses), are likely to be severely restricted. As such, the supply of unconstrained vacant land in the Russellton Industrial Estate is closer to 5ha – or 7.7ha including underdeveloped sites.

3.1.3 Smith Drive

Smith Drive industrial area is located in West Ballina, approximately 5km from the Ballina town centre. The *Ballina Shire Combined Development Control Plan* specifies that sites catering for marine-based industries are available in this area and that waterfront dependent users will be encouraged at Smith Drive. A site visit in October 2011 revealed many unnamed business and little activity. There were a few businesses that appeared to be marine related, but some that were not, such as a catering equipment supplier and a gem cutting equipment supplier. There did not appear to have been any recent development in the area.

There were 8.1ha of industrial zoned land on Smith Drive, which comprised of three large lots. This vacant industrial land is likely to only appeal to a limited range of industrial uses given the large lots and the aim of a marine focus for the area.

The location of this industrial area on Emigrant Creek suggests that the area could be subject to periodic flooding.

3.1.4 Other industrial areas

There are other smaller industrial areas within the Ballina Shire.

Clark Street Industrial Estate contains 6.4ha of industrial zoned land and is located close to the Ballina town centre. It is an older estate containing a mix of industrial businesses as well as a bowling alley. The estate is fully developed and does not contain any vacant land.

Boat Harbour Road contains an industrial zoned area around the existing harbour (which is included in the 6.3ha of industrial zoned land). The land around the harbour has not

been developed and as such forms part of the vacant land supply. The vacant portion of the lot has been estimated at 3.2ha.

West Ballina contains two separate industrial areas – one along Barlow road and one along the Pacific Highway and Kalinga Street. These two areas total 4.9ha and have no vacant land. The southern area along the Pacific highway includes non-industrial businesses such as car dealerships, a service station, a motel and a funeral parlour and some light industrial uses such as auto repair businesses and self-storage. The industrial area along Barlows Road contains a landscaping business, a metal work business, cold storage and an indoor sports and skating centre.

Ballina Airport has an industrial area on the southern side of the runway. The land (3.1ha) is not subdivided and therefore the small vacant parts of the lot have not been estimated. Some of the businesses located here are associated with the airport including rental car offices and a small plane manufacturer. Other businesses are not related to the airport such as a pork company, a printer, a commercial laundry and a removalist company.

3.2 Recent sales activity

Table 3.2 is a summary of the sales of vacant land since 2000 in Russellton Estate. The number of sales has dropped considerably since 2008 reflecting the Global Financial Crisis. Sales prior to 2008 are likely to give a better indication of future market activity assuming economic conditions improve. Between 2000 and 2007, there was an average of 4.3 sales per year and 0.7ha per year. This average fell to only 1.3 sales per year and 0.2ha since 2008.

Table 3.2: Summary of sales of vacant industrial zoned land, Russellton Estate, 2000 to 2010 *

| | <i>Number of sales</i> | <i>Median lot size (m²)</i> | <i>Total Area (ha)</i> |
|--------------------------|------------------------|--|------------------------|
| 2000 | 2 | 929 | 0.19 |
| 2001 | 4 | 1,206 | 0.57 |
| 2002 | 7 | 1,162 | 1.10 |
| 2003 | 6 | 1,163 | 0.74 |
| 2004 | 4 | 1,172 | 1.08 |
| 2005 | 4 | 1,323 | 0.71 |
| 2006 | 3 | 1,176 | 0.63 |
| 2007 | 4 | 1,280 | 0.58 |
| 2008 | 2 | 1,883 | 0.38 |
| 2009 | 1 | 800 | 0.08 |
| 2010 | 1 | 1,255 | 0.13 |
| TOTAL | 38 | 1,169 | 6.18 |
| Average per year 2000-10 | 3.5 | | 0.56 |
| Average per year 2000-07 | 4.3 | | 0.70 |
| Average per year 2008-10 | 1.3 | | 0.19 |

* If the same lot is sold multiple times only the most recent sale is included in the analysis.

Source: Foresight Partners calculations based on sales data from Pricerfinder.com.au

Sales of vacant industrial land over the past 10 years indicate that the Russelton Estate has a price advantage over the other industrial areas within Ballina Shire, which are all located in the Ballina township area. Median prices per square metre have constantly been lower in the Russelton Estate than for Ballina's other industrial areas (Figure 3.1). This suggests that the proposed industrial development is also likely to offer a price advantage over other industrial land in Ballina.

Figure 3.1: Median prices (\$/m²) of vacant industrial land, 2000 to 2010



* Ballina includes all industrial land within the Ballina Shire apart from Russelton Estate. The high median price in 2005 reflects purchases of three adjacent sites on Cessna Drive by one purchaser. No sale was recorded for 2009 outside Russelton Estate.

Source: Foresight Partners estimates based on data from www.pricerfinder.com.au

3.3 Summary and implications

- There is currently an estimated 46.8ha of vacant industrial zoned land within Ballina Shire – 22.4ha in Southern Cross Industrial Estate, 13.1ha in Russelton Estate, 8.1ha at Smith Drive and 3.2ha at Boat Harbour Road.
- However, some of this land is constrained by topography or by a non-industrial designation in a masterplan. Approximately 10ha in Southern Cross Industrial Estate is designated in the *Southern Cross Precinct Masterplan* as a bulky goods precinct, and 8.1ha of land in the Russelton Estate is comprised of three large steep lots.
- Consequently, the effective supply of vacant land for industrial purposes within these two major estates is estimated at about 17.4ha (net) – 5ha in Russelton and 12.4ha in Southern Cross – which is almost half the 35.5ha inventoried in these estates. Underdeveloped land (mainly in Russelton) would increase this to about 20ha of useable vacant industrial land.

- Russellton Estate is a distinct industrial estate, different to the other industrial estates within Ballina. It is the only industrial estate outside Ballina township and it shows a price advantage over the other areas. Estates within Ballina township also differ and it is evident that they are not equal with respect to potential demand and take-up. A vacant lot in Smith Drive or Boat Harbour Road does not appear to be readily 'substitutable' for a similar sized lot in the more desirable Southern Cross or Russellton estates.

4 INDUSTRIAL LAND DEMAND

This section examines industrial land demand within Ballina Shire and particularly the Alstonville/Wollongbar area. Land demand projections, based on employment forecasts at the Shire level and historical take-up rates at the town level are presented.

4.1 Ballina Shire

Previous work undertaken for Council in 2008³ concluded that there was a sufficient supply of industrial zoned land to meet anticipated future demand. Lawrence Consulting estimated that between 2008 and 2018 an additional 8.5ha of industrial land would be required to accommodate employment growth and 16.7ha between 2008 and 2028 for the whole Ballina Shire.

Foresight Partners used a similar methodology to verify and update these forecasts. The methodology is based on forecasts of the number of people employed within Ballina Shire and the application of average employment densities, based on previous Foresight Partners work and benchmarks, to determine the land required to accommodate the additional employment within industry sectors.

Foresight Partners estimates an additional 7.2ha of industrial land (net) would be required between 2011 and 2021, and 12.9ha (net) between 2011 and 2031. This is based on the following assumptions:

- the proportion of persons in the workforce in each five year age group remains unchanged from 2006;
- the labour force containment rate remains at the 64% from 2006 (i.e. 36% of employed Ballina Shire residents continue to work outside the Shire);
- the job containment rate remains unchanged at 79% (i.e. 21% of jobs within Ballina Shire are undertaken by people residing outside the Shire);
- the employment distribution by industry sector remains unchanged from 2006;
- average employment densities for each industry sector ranging from 15 employees per hectare (net) for Transport, Postal and Warehousing to 35 employees per hectare for Manufacturing.

³ GeoLink (2008), *Ballina Shire Industrial and Commercial Land Use Review*

Table 4.1: Ballina Shire employment projections and required industrial land to 2031

| | <i>Ballina Shire Estimated Resident Population</i> | <i>Working population in Ballina Shire*</i> | <i>No. people in employed in industrial sector*</i> | <i>Additional land required at average employment densities (net ha)</i> |
|-----------------------|--|---|---|--|
| 2006 | 40,293 | 13,910 | 3,241 | |
| 2011 | 43,040 | 14,745 | 3,436 | |
| 2016 | 45,777 | 15,292 | 3,563 | |
| 2021 | 48,530 | 15,684 | 3,654 | |
| 2026 | 51,252 | 16,060 | 3,742 | |
| 2031 | 53,834 | 16,433 | 3,829 | |
| Increase 2011 to 2021 | 5,490 | 939 | 219 | 7.2 |
| Increase 2011 to 2031 | 10,794 | 1,689 | 393 | 12.9 |

*Includes all people working in Ballina Shire (residents and people from outside the Shire)

Source: Foresight Partners estimates

*Net industrial land*⁴ equates to allotments within fully developed (subdivided) industrial estates. The additional industrial land that is expected to be required within Ballina Shire – 7.2ha by 2021 or 12.9ha by 2031 – is net industrial land or allotment area.

Raw industrial land is the actual land zoned for industry, based upon cadastre boundaries, and includes constrained lands such as drainage lines and flood liable land, steeper slopes (where present), or no slopes (where drainage works/retention basins may then be required), vegetated areas to be protected/preserved, plus the land which, at subdivision stage, has to be set aside for internal roads, utility easements, buffers, open space contributions etc. A general rule of thumb applied in calculating future industrial land demand is that net land or site area is about 50% of raw land. Obviously, the actual net yield will vary with the quality of the raw land.

Most of the vacant land within Ballina Shire is in subdivided estates and as such the area of vacant land available is a measure of net industrial land. This includes Russellton Estate even though the last stage has not been subdivided. The total of the proposed allotments was used in calculating vacant land supply and areas for roads and buffers were therefore excluded.

The above methodology is likely to understate the land demand, and therefore forms a 'base case' scenario. It is based heavily on the projected age structure of the population and the labour force participation rates for each age group. As NSW Planning forecasts the Ballina Shire population to age considerably over the next 20 years, the percentage increase in the number of employed people within the Shire is significantly smaller than the percentage increase in the total population – the number of employed persons in Ballina Shire is projected to increase by only 11% between 2011 and 2031 even though the total population is forecast to increase by 25% (Table 4.1). If the proportion of the

⁴ Foresight Partners adopts *net* and *raw* land as defined by the Industrial Land Analysis and Planning (ILAP) branch of the former Queensland Department of Infrastructure and Planning.

population that are employed is higher than we assumed the number of employees, and therefore the amount of land demanded, would be greater than forecast.

Similarly, if less people (in percentage terms) travel outside the Shire to work, the amount of industrial land required within the Shire could be higher than forecast. As discussed in Section 2.2.1 the 2006 labour force containment rate is relatively low, including in the industrial sectors. This means that there is potential for a greater proportion of residents to work within the Shire rather than travelling elsewhere in the future.

Also, this methodology does not take into account exogenous or 'serendipitous' demand. Industrial land demand usually has an exogenous component which cannot be anticipated based on population or employment growth, especially in smaller markets such as Ballina. Exogenous demand is driven by other factors such as strategic positioning to serve a regional or larger market, lifestyle/amenity attributes of an area or comparative ease of market entry (minimal red tape) which influence a (often larger) firm to establish or relocate to an area. When opportunities to secure such firms arise, having sufficient designated land at competitive prices is essential. Allowing for such demand also provides a buffer of supply to meet longer term future needs.

4.2 Alstonville-Wollongbar

The above employment analysis was not undertaken at the smaller level of Alstonville-Wollongbar as the employment forecasts are based on population projections which are not available for the individual towns and working population data is from the ABS and also only available at the Shire level.

An alternative method for forecasting industrial land demand is to use historical take-up rates estimated from sales of vacant industrial land (excluding resales). Past sales and development patterns indicate drivers of demand and provide some insight into likely future demand and the adequacy of current industrial land supply to meet that demand.

This analysis was undertaken for the Russellton Estate. There were a total of 38 sales of vacant lots in the Russellton Estate between 2001 and 2010, an average of 3.5 sales per year (see Table 3.2). This excludes resales meaning that if an individual lot had been sold multiple times, only the most recent sale was included.

Over the 2001 to 2010 period, an average of 0.56ha of vacant industrial land was sold per year. However, since the GFC there have been fewer sales than in prior years. Therefore a better indicator of future take-up is to use pre-GFC sales. From 2001 to 2007 an average of 0.70ha of vacant industrial land per year was sold. This is based on sales of subdivided vacant lots and therefore represents net industrial land.

Assuming demand for 0.7ha of net industrial land per year, a total of 14ha of net industrial land would be required in (or near) the Russellton Estate area over the next 20 years. The current supply of vacant and underdeveloped land in the estate of 15.8ha would be sufficient to meet this demand. However, if the large steep lots (8.1ha) are excluded, the supply of vacant and underdeveloped land which is unconstrained is 7.7ha, which only represents an 11 year supply.

5 ECONOMIC AND COMMUNITY NEED AND IMPACTS

Although the current industrial land supply-demand balance in Ballina Shire overall would appear capable of meeting future demand for some years, there are other factors and considerations that suggest a need for augmenting the future supply of industrial land in the Wollongbar–Alstonville area. This section outlines these factors and discusses the subject site's potential role in meeting future needs and the community and economic benefits of reserving the subject site for industrial purposes. Inclusion of the subject site within the Industrial zone represents, in effect, an extension of the existing Russellton Industrial Estate.

5.1 Supply – demand balance and future need

As discussed in Section 3.1 the Southern Cross and Russellton Industrial Estates provide most of Ballina's industrial land, both occupied and vacant. Nominally, they have about 35.5ha of land available for future development as at October 2011; effectively, the useable supply for industrial purposes is closer to 17.4ha (net) because of topography or anticipated non-industrial uses such as bulky goods, or 20ha including underdeveloped sites. This 17.4ha is on par with Council's 2008 estimate of future demand to 2028 (16.7ha).

The Southern Cross Estate does have additional adjacent land available upon which to accommodate future demand, although the net yield or useable site area of the 19.5ha masterplan area is uncertain at this point.

Vacant land in Ballina's other industrial areas – 8.1ha in Smith Drive and 3.2ha in Boat Harbour Road – does not have the market appeal of the two major estates and are quite different in industry mix and locational attributes (waterfront and harbour areas). Although part of Ballina Shire's overall available industrial land supply, vacant sites in these areas do not appear readily substitutable for vacant sites in Southern Cross or Russellton. Consequently, they should be treated separately or discounted with respect to meeting future need and demand for industrial land within Ballina Shire.

Similarly, demand for lots in the Southern Cross and Russellton estates would also vary over time, and their appeal would vary among potential users. The 2008 *Industrial and Commercial Land Use Review* report prepared for Council considered Ballina Shire as a single industrial market, and did not differentiate between industrial areas and localities.

Historic (pre-GFC) land demand or take-up, as indicated by vacant land sales in Wollongbar–Alstonville suggests that there is likely to be a need for additional industrial land in this area. Unconstrained vacant and underdeveloped land supply is about 7.7ha and, assuming historic take-up rates of 0.7ha per year, this represents about an 11 year

supply (seven years if the tennis court site, which is classified as underdeveloped, remains in its current use).

The subject site would enable the expansion of the adjacent Russellton industrial area to meet demand well into the future, and represents a logical economic land use and planning outcome for the area.

Although demand for the site might not arise for several years, it is prudent to plan for, reserve (and protect) future industry land supplies well in advance of demand. The Victorian government, for example, has set a benchmark of 15 years supply of industrial land across the major industrial nodes of Melbourne, of which at least ten years should be zoned to permit development⁵. This benchmark has factored into the planning for industrial land in a number of Queensland commercial and industrial land demand studies prepared as part of planning scheme reviews.

5.2 Potential impacts and benefits

While our investigations do not identify an *immediate* need for the development of the subject site for industrial uses, there are a number of other community and economic 'positives' or benefits in designating the site now for future industry development.

- The completion of the Bruxner Highway Bypass effectively defines a physical boundary which preserves the urban buffer function of the subject site even when it is fully developed. Appropriate landscaping and site layout can help preserve the visual aspects of the buffer, particularly as the northern edge of the site is elevated relative to the Bypass.
- The new Bypass now allows industrial traffic to access the Russellton Industrial Estate (and the subject site) without the need to travel through Wollongbar-Alstonville residential areas. The Bypass will also help considerably in mitigating any potential adverse impacts of increased truck and other vehicle traffic attributable to the development of the subject site for industry and employment.
- The Alstonville-Wollongbar area is well positioned between the Lismore and Ballina township 'hubs' and its role as an industrial employment area is greatly enhanced by its improved accessibility.
- Council, as original landowner and developer of the major estates, currently controls most of the available vacant industrial land and has the major responsibility in marketing Ballina's industrial opportunities. While a major private sector industrial land developer would compete with Council to some extent, it would also generate mutual benefits for both, and the broader community. In order to attract new firms, and especially firms from outside the area, the developer of the subject site would first need to market Ballina Shire as a

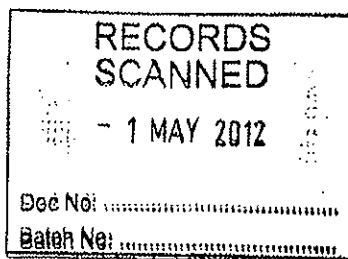
⁵ Victorian Department of Planning and Community Development *Urban Development Program Annual Report 2007*.

desirable business location, and then market the Alstonville-Wollongbar as a preferred location within Ballina Shire.

- As an inland site and former farm, the subject site is largely clear of vegetation and will not require expensive fill. Consequently, as with the existing Russellton Estate, development of the subject site is likely to maintain a price difference relative to Southern Cross and other township industrial areas.
- The site is well positioned to provide local industrial employment opportunities near an area which is expected to show significant population growth. The Wollongbar Urban Expansion Area is expected to accommodate an additional 2,500 people, which would raise the Alstonville-Wollongbar area's population to about 10,000.
- As an effective extension of the existing Russellton Industrial Estate, the subject site will provide business and employment opportunities which could assist in retaining resident workers who currently leave the Shire for industrial employment.

In summary, the designation of the subject site for industrial uses represents a logical and prudent economic and land use outcome, and one that would not jeopardise the intended function of the site as an urban buffer between Wollongbar and Alstonville. It represents, in effect, an extension and strengthening of the well-established Russellton Industrial Estate as a generator of employment and contributor to Ballina's broader economy. Given the historic take-up evident for this area (prior to the GFC), it is likely to be needed to meet future demand in the medium to longer term, rather than in the short term. However, it is good economic planning to designate and preserve adequate industrial land supplies well in advance of demand.

STRATEGIC & COMMUNITY SERVICES GROUP,
PO BOX 450,
BALLINA NSW 2478.



29th April, 2012

Subject: Growth Management Strategy (GMS)

Dear Mr Wood,

Acknowledgement of correspondence dated 17th April 2012 regarding the draft GMS.

Following your suggestions, we have taken the opportunity to view the mentioned report on the Council's Web Site and the specific section in the GMS regarding Skennars Head.

We would like to offer our congratulations regarding the Council's strategic planning approach to land use patterns that best meet the existing and future needs of growth in the Ballina Shire. The GMS initiative provides a welcome approach to more fully consider the development opportunities of landholdings that can contribute to the orderly growth development plans articulated in various reviews conducted by Ballina Council.

Subsequently, the GMS more fully accommodates the current projected demand and supply solutions for various categories of land use identified in the Ballina LEP 2012 and complements the comprehensive approaches taken by the Ballina Council.

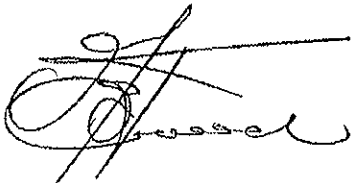
The Strategic Plan submitted by Ashwood/Bryant also identifies extremely closely the projected growth developments and the need for comprehensive long term planning. As such, it would be appreciated if the following points could be considered by the Ballina Council.

- As identified in the GMS the parcels of land occupied by Ashwood/Bryant can provide a valuable contribution to future urban development in the Ballina Shire.
- The nature and intentions of the Ashwood/Bryant Strategic Plan fully identifies with the concepts and philosophies of Ballina Shire Council's urban growth planning policy.
- Given the intentions of the Ashwood/Bryant Strategic Plan, that future urban rezoning considers the land occupied by Ashwood/Bryant be viewed as a suitable parcel for urban development rezoning in its own right.

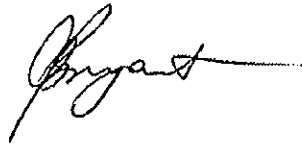
At a time convenient to Ballina Council staff we look forward to the opportunity of discussing processes and timelines necessary for a rezoning application for the Ashwood/Bryant properties.

It is much appreciated to have had the opportunity to participate in the consultative and transparent planning process conducted by Ballina Council and we would welcome any future involvement to ensure that the Ashwood/Bryant S.P. is an integral part of urban development for Skennars Head.

In anticipation of continued interest and correspondence,



A.M. & P.C. Ashwood
380 North Creek Rd
Skennars Head 2478



P.J. & M.A. Bryant
386 North Creek Rd
Skennars Head 2478

Ballina Environment Society Inc

PO Box 166 Ballina

NSW 2478 Australia

bese66@westnet.com.au



1st June, 2012

SUBMISSION ON DRAFT URBAN GROWTH STRATEGY

Ballina Environment Society is pleased to see Ballina Council further develop the Shire's strategic growth concepts.

Sustainable growth is a major issue BES has discussed many times in previous submissions, particularly with regard to the new Local Environment Plan, Strategic Growth Areas.

Our concerns regarding this Urban Growth Strategy are:

- 1 Building Approval increases
- 2 Incomplete vegetation mapping and application of available mapping.
- 3 Unidentified and unprotected heritage items.
- 4 Water management and pollution control.
- 5 Urban buffering.
- 6 Lot consolidation and multi-storey development.
- 7 Provision, access to, and use of open space.
- 8 Pedestrian and mobility linkages.
- 9 Revisiting the failed third plateau village.
- 10 Challenges of an ageing demographic.
- 11 Social justice and affordable housing.

1. Building Approval increases

The Growth Management Strategy contains a major rift between sustainable principles and prescribed quotas.

BES questions the reality of trying to almost double approval rates to achieve 8,400 new dwellings by 2031. There were 2,670 approvals between 1999 and 2007 which were good years financially. In these times there is unlikely be enough monies for developer or Council to prepare the required infrastructure. The strategy promotes decreasing the ratio of houses to units, although Ballina Shire is already below the 60/40 target at 56/44. It also requires 15 dwellings per hectare on greenfield sites, significantly greater than achieved previously and beyond the capacity of most SGAs.

Over ambitious targets will overshadow the goals of protecting our environment and retaining our neighborhood character.

BES questions whether the targets can be reached. Moreover, there is concern that if development does reach this target, it will be to the detriment

of good design and at a great cost to the environment. There could also be buyer resistance.

Environmental constraints, community aspirations and the implications for infrastructure should be considered before such a high figure is put on the land's carrying capacity.

The 'chicken and the egg' dichotomy recognized in the Strategy is evident in the points concluding the chapter on Local Growth Management Strategies - Shire Wide and Other Localities which state:

Investigate site options and the economic feasibility of a large-scale greenfield marine precinct within the Lower Richmond River Estuary.

What does a large scale greenfield marine precinct mean?

Manage and promote environmental and cultural heritage values of the shire *where appropriate*.

When is promoting the environment and cultural heritage of our shire not appropriate?

This dichotomy has historically resulted in growth and infrastructure demands which were detrimental to environmental zones. For example: Angels Beach Drive was needed following Council's developments at Prospect and Chikiba. The road was built through internationally protected migratory bird roosting areas, Federally protected Aboriginal Sites, State protected Wetlands and two retirement villages' canal frontages.

Parallels can be drawn with Council's' current issues delivering Hutley Drive extensions and surrounding Ross Lane as raised by CURA B.

**Include environmental factors in computerised traffic modelling.
Don't make environmental sacrifices to achieve computer predictions.**

2. Incomplete vegetation mapping and application of available mapping.

Council is well aware of the knowledge gaps in their vegetation mapping. The non-inclusion of any vegetation mapping which has been conducted over Strategic Growth Areas is not acceptable for an Urban Growth Strategy. The inclusion of Vegetation mapping will enable potential developers and Council to have some certainty to proceed with the expensive initial planning stage. Council needs to complete and include vegetation mapping in SGAs

3. Unidentified and unprotected heritage items.

'Manage and promote Aboriginal and European cultural heritage values in accordance with relevant stakeholders.' is repeated as the final Strategic Action in every one of the Local Area Management Strategies. The draft Delivery Program and Budget currently on exhibition claims an achievement in 2011-12 for completing the Aboriginal Heritage Study.

The new Local Environment Plan does not include any listing of aboriginal sites, despite the importance of the Bora Ring, Lake Ainsworth, Shag Rock, the Shaws Bay longhouses recorded by Rous, the Ballina Middens - particularly B2 listed on the National Estate - and many more sites.

Our sad history of consents issued or sites 'unknowingly' destroyed should not be repeated.

The lack of any constraint mapping associated with heritage sites is unacceptable for an Urban Growth Strategy.

BES requests an immediate review of LEP11 to ensure culturally appropriate mapping, including the removal of significant sites from SGAs.

4. Water management and pollution control.

Given the intensity of SGAs in the Lennox Head and West Ballina STW catchments, the delivery of efficient water cycle management will be a continuing challenge. Technologies and techniques are continually evolving and Council needs a dynamic approach to water management, or issues of quality and quantity of effluent into Skennars Head Ocean Outfall and Fishery Canal Discharge will grow.

There are worthy words:

'Develop & enforce principles for infrastructure & urban development that minimizes negative impacts on water quality;
Protect prominent areas of vegetation, waterways, & geological landforms;
Prevent marine & foreshore pollution;
Improve riverbank vegetation;
Assessment of pre and post development stormwater pollutant loads;
Assessment of pre and post development stormwater flows;
Assessment of potential stormwater impacts on receiving environments'.

Unfortunately, Council has failed to remove from Strategic Growth Areas locations which are highlighted as inappropriate by these worthy words. For example, south 'Henderson Land' and Ballina Island adjacent to Fisheries Canal.

Council has much to gain by the reinstatement of a community access forum to monitor and match the words with the practice.

Reinstate the urban water management reference group and publishing of water quality results as mediated with this Society through the Land and Environment Court.

5. Urban buffering.

BES applauds this concept and encourages Council to take the obvious next step.

Remove from SGAs urban buffer zones, noting E3 as the mechanism in Local Environment Plan 2011.

6. Lot consolidation and multi-storey development.

The 'human scale' of development in Ballina is one the population cherishes and constantly reaffirms. The investment required for multi-storey development is considerable and may not be available at the moment, but tight controls, rather than a casual mention will be needed when submissions are made. Surely, the definition of heights and building envelopes in the LEP11 closes this can of worms.

All mention of multi-storey development should be removed from the Strategy.

7.Provision,access to,and use of open space.

Council has a poor record of considering that recreational land has constraints and requirements which can only be served in a limited number of locations. When Council sold off the Henderson Land, it kept the southern section to create a central sports precinct at Lennox. The land proved unsuitable.

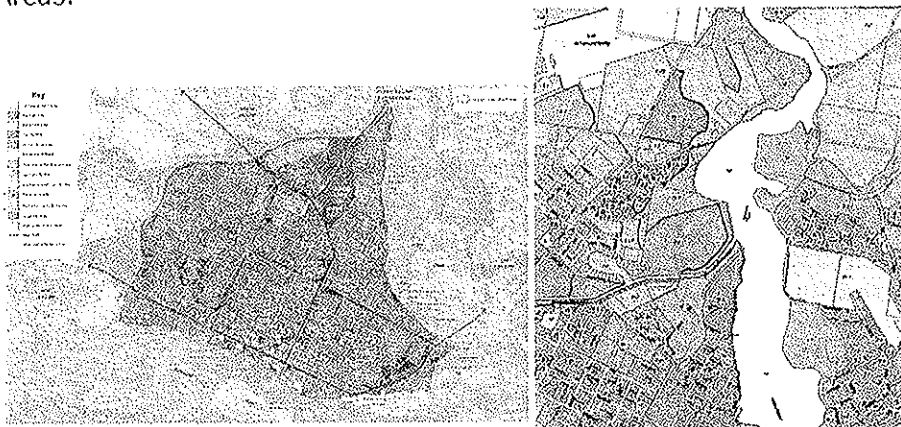
If proper consideration to sports fields is not given, situations result like Tintenbar Soccer field at East Ballina, Lennox Soccer Fields at Skennars Head and the new field at Cumbalum, which were constructed in environmental zones therefore interfering with - constrained by - wetlands.

Other poorly planned examples include parking provisions at Megan's Reserve, the inaccessible fields at Pacific Pines and the now regeneration site at Tara Downs, where sports fields were constructed with the 1980's development.

Williams Reserve was given to the people of Lennox 'for the purpose of recreation'. Just because the spoonbills are not roosting in the Spoonbill Reserve at the Headlands Estate, dedicated when the first residents noticed them, does not justify a change of use.

LEP11 includes roadways and left over land as recreational – is it?

Issues have recently been exacerbated in open spaces, eg: Porters Park, Ballina; Lake Ainsworth, Lennox Head; and Crawford Park, Alstonville. Council must be more pro-active in allocating zones to Strategic Growth Areas.



Open space and sporting field opportunities need to be mapped for every SGA.

8. Pedestrian and mobility linkages.

This issue is not acceptably addressed in the strategy where the only mention of cycleways or pedestrian linkages is the recognised lack of access between urban areas at Skennars Head, East Ballina and Lennox.

The decision of council to preference a recreational cycleway over pedestrian and cycleway provisions is, in our opinion, a poor one given the huge increase in urban areas identified in the Strategy. Mobility infrastructure will be of critical consideration for urban growth in the future given climate change considerations and probability of peak oil

Greater regard needs to be given to PAMP and an integrated transport network.

The report proposes Council again investigate the North Creek Road crossing. The Old Shell Road was built on and from the Ballina middens, the easement is not wide enough for today's demands, the easement contains EEC remnants, the water and sewerage pipes were laid at a time Council did not consider the option viable.

Any consideration of a North Creek Road crossing should focus on a pedestrian/cyclepath rather than a road bridge, even then it will face challenges.

9. Revisiting the failed third plateau village.

Council expended considerable resources investigating this concept for the new millennium, only to accept it is far from a sustainable solution and is not supported by infrastructure or by the community. Why bring it up in the Urban Growth Strategy? Isn't this about the further investigation of the areas which have been identified with potential in the new LEP.

All reference to the third village should be removed.

10. Challenges of an ageing demographic.

The State Governments Seniors Housing Policy was not helpful in promoting well designed communities catering for an ageing population because it allowed development applications to bypass the rezoning process. Fortunately this was addressed well in the new LEP.

Ballina is justly proud of its aged care facilities and the community will resist attempts to house our seniors in poorly designed multi storey units or to isolate them from services and activities.

Among the greatest pressures on our aging population are a rapidly changing, increasingly unfamiliar neighbourhood and unreasonable rises in the cost of living.

The property boom and rate rise in Lennox Head in the early 2000's resulted in the sale of many old fishing shacks, developed into large heavy weight strata-titles. Basement garages dug into the sand and no views past to the sea.

What opportunities are there for Seniors Living in Alstonville? The Strategy highlights an ageing population wanting to retire from their now too large residence, yet remain in their neighbourhoods. Is Alstonville to have lot consolidation to increase density - is that what 'infill intensification' means? It is not very clear - just a strategic action.

Good design requires a good brief. This issue cannot be solved by an increase in the percentage of units to single dwellings.

11.Social justice and affordable housing.

It is difficult to believe in Council's commitment to affordable housing and social justice when two long term caravan parks which provide a core base for affordable housing and affordable tourism in the shire, Headlands Leisure Park at Skennars Head and Sandalwood Van and Leisure Park in Wardell continue to be retained as urban growth.

There is also a risk for social justice and affordable housing if principles are misused to maximise densities and circumvent regulations, reducing the choice, quality and viability of affordable housing.

The extent of medium density proposed in recently exhibited CURA A and B will greatly increase the challenges of creating sustainable communities, particularly if the required 15 dwellings per hectare is attained.

The currently zoned urban land, yet to be developed, combined with the SGAs has the potential to create considerable loss of amenity for existing residents and visitors, many of whom appreciate the implications for the Lake, heath and Nature Reserve, without well planned, usable open space and local services.

This strategy only hints at work to be done to make this achievable **The Strategy needs to have a detailed specific plan.**

Conclusion

Ballina Environment Society appreciates the areas which have been withdrawn from BLEP87 1(d) urban investigation zones, eg: Burns Point, Ballina and Sanctuary Village, Lennox.

Even with the best planning of greenfield estates, the impact of SGAs across the region have implications to the amenity of our villages and hamlets, and the health of our catchment from the plateau to the coast.

Unfortunately the mapping does not include geology, topography, vegetation or heritage items which could have added emphasis and depth to the rhetoric in the text.

BES doubts the efficacy of the Growth Management Strategy as it does not recommend removal of investigation zones from Strategic Growth Areas, where they are not consistent with strategic findings.

It is our conclusion that there are still important Strategic Growth Area amendments to LEP11 to assure environmental protection and prevent undue land holder or developer expectations and investment.

Until unrealistic SGAs are removed from the Urban Growth Strategy, there remains the possibility of developers pressuring consultants and lobbying Governments to loosen the controls and accept a DCP against the best interests of the environment and the desire of the community.

Recommendations:

Environmental constraints, community aspirations and the implications for infrastructure should be considered before such a high figure is put on the land's carrying capacity

Include environmental factors in computerised traffic modeling. Don't make environmental sacrifices to achieve computer predictions.

Council needs to complete and include vegetation mapping in SGAs

Reinstate the urban water management reference group and publishing of water quality results as mediated with this Society through the Land and Environment Court.

Remove from SGAs urban buffer zones, noting E3 as the mechanism in Local Environment Plan 2011.

All mention of multi-storey development should be removed from the Strategy.

Council must be more pro-active in allocating zones to Strategic Growth Areas. Open space and sporting field opportunities need to be mapped for every SGA.

Greater regard needs to be given to PAMP and an integrated transport network.

Any consideration of a North Creek Road crossing should focus on a pedestrian/cyclepath rather than a road bridge, even then it will face challenges.

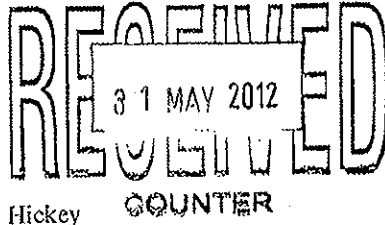
All reference to the third village should be removed.

Good design requires a good brief. This issue cannot be solved by an increase in the percentage of units to single dwellings.

The Strategy needs to have a detailed specific plan for affordable housing.

Ballina Environment Society urges Council to review this Strategy, with particular emphasis on improving the mapping so recommendations for reductions to the Strategic Growth Areas can be clearly identified. Until then the land remains open to manipulation, coercion and bullying.

Lyn Walker
President



1/69 Stewart Street
Lennox Head NSW 2478
Phone: 6687 7221
E-mail: marellelee@gmail.com
31st May 2012.

Mr Paul Hickey
The General Manager
Ballina Shire Council
Ballina NSW 2478.

Dear Mr Hickey **Re: BSC GROWTH MANAGEMENT STRATEGY**

I wish to make a few brief comments about Ballina Shire Council's Growth Management Strategy. The GMS is a comprehensive document, probably best considered along with earlier documents about Ballina Shire planning... DCPs, LEPs etc.

My main interests are about preservation and recording of important heritage and history, because I am a member of the Richmond River Historical Society's Heritage Committee.

Also as I have lived at Lennox Head since 1994, and my parents previously owned a beach cottage on Pacific Parade from the mid-1950s to mid-1970s, I am interested in the changing demographic, and planning for the future of this fast-growing area for the next 20 years.

LENNOX HEAD: The word 'infill' alarms me, because developments which are intended to increase density from low to medium have resulted in considerable loss of quality of life for residents, some of whom have lived here for decades. This trend cannot be discounted by such ludicrous claims as "You want to deny others the features you came here to enjoy."

NARROW BLOCKS; Developments which create social evils such as noise and visual pollution, and loss of privacy, should not be permitted. Worst offenders in Lennox village occur when narrow blocks are split in half lengthwise, to provide strata lots.

The original blocks in the 1920s Lennox Head Estate are only 15.89 metres wide. They were intended for small beach cottages, built not close to side boundaries, and served that purpose well. When split lengthwise, each lot is less than eight metres wide. Unless occupants are exceedingly quiet and discreet, this inevitably results in neighbourhood noise pollution and diminished privacy.

It is no use blaming estate agents for unsuitable tenants. They don't care about the welfare of other residents. Agents seem to see their roles as filling vacancies, to provide continuing rental income to owners. (Friends in Ballina have expressed similar views.)

With predicted sea level rises, Lennox Head village may face inundation in coming decades. However it does have the advantage of the installation of a series of ti-tree fences along the beachfront and other anti-erosion measures, by volunteers.

SEA WASHING INTO LAKE AINSWORTH: In company with *Northern Star* photographer, Darcy McFadden, as a journalist I witnessed the sea entering Lake Ainsworth, in small waves, early in 1967, after a series of cyclones tore into the dunes. Darcy took photos. Despite misgivings by some Tintenbar Shire Council staff, local landowners, in a tremendous community effort, built the major fence, from opposite Lake Ainsworth going south along Seven Mile Beach. The sea has not washed into the lake since.

Therefore Ballina CBD would seem more at risk from the ocean (plus Richmond River rises), than Lennox village.

GMS-2

My conclusion is that it would be more desirable to encourage amalgamation of narrow Lennox blocks rather than split them lengthwise. Such amalgamations were advocated in NSW planning recommendations shown to me by Member for Ballina, Mr Don Page, before he became NSW Minister for Local Government.

The Lennox Head Community Aspirations Strategic Plan and Lennox Head Structure Plan are worthwhile documents. But they were drawn up years ago, and some new planning projects have loomed on the horizon since, which may change conclusions.

A major initiative, supported I understand by the NSW Government, is Cumbalum B Precinct, only five kilometres from Lennox Head, predicted to house as large a population as Lennox Head, in the next 20 years. It is to be linked to Lennox by Ross Lane, which will be doubled from two to four lanes.

This must mean considerably more traffic to and from Lennox village, with additional strain on already stretched local infrastructure. Sewerage, water supply and emergency services also will have to be expanded. Where will Lennox Head Bushfire Brigade be housed?

As the GMS study notes, sales of Pacific Pines, North Creek area and other nearby developments also will provide dwellings for thousands more people. So the population of Lennox is likely to double, apart from Cumbalum B Precinct.. The growth of Skennars Head, which does not have a CBD, also will add to Lennox village traffic.

Lennox village's main street, Ballina Street/Pacific Parade, was designed in the horse and buggy era, before motor vehicles, skateboards, etc created congestion. Turning it into a one-way thoroughfare should be considered. Ballina Council's reconstruction and widening of Park Lane has been a considerable achievement. Essential Energy installing powerlines underground will improve the appearance of the main street.

In the past 20 years Lennox Head has changed from being a village to a resort, particularly in good beach weather, and should be planned accordingly. 'Village atmosphere' is past tense.

SOME POSITIVE POINTS:

- Good news that in future land east of the Pacific Highway will not be considered for further urban development
- Cycleway/pedestrian linkages to be installed Lennox Head and Ballina
- Prevention of future ribbon or strip development
- All Locality Objectives and Strategic Actions and Principles
- Avoid intensifying land use in coastal risk areas
- Potential future road construction to Ballina across North Creek (P43 map)

SOME MINUSES:

- Ratio of houses to units apparently to decrease
- Greenfield sites aiming for 15 dwellings per hectare could cause problems
- The GMS says that areas of 'high conservation value' will be protected. I suggest that 2-4 Ross Street, Lennox Head, has a 'high conservation value' and should NOT be sold off
- Council will review CBD building heights limits sounds ominous. Where would the buildings be? Not on coastal land, I hope.
- Nor should Council permit garages to be installed half under ground level, in areas where the ground water table is high
- Lennox Head Community Centre has acoustic problems. Meetings in the small rooms have been interrupted by crashing on the walls, by people in the main auditorium.

GMS-3

SAVING OR RECORDING IMPORTANT HERITAGE:

The GMS says 'The coastal landscape has significant Aboriginal cultural heritage values' and 'Aboriginal, European and other non-Aboriginal cultural heritage values should be managed in accordance with best practice guidelines.'

That is vague and non-specific, and might not prevent significant Aboriginal sites being bulldozed, as in the past. Eg Lennox Head once had four bora rings. It was due to campaigning by the Richmond River Historical Society that the present bora ring was saved.

Once there were Aboriginal middens near the former North Creek bridge, which a visiting British university lecturer estimated were older than the historic painted caves in Europe.

Have local Aboriginal authorities been asked to provide locations of significant heritage, to them, to avoid further destruction?

Indian and Afghan presence, as outlined by the late Annette Potts, in *Richmond River Raga*, also should be noted.

At various times I have been contacted by concerned citizens, particularly about proposed demolition of heritage buildings. Despite campaigning by citizens, and sometimes by staff, some of those buildings have been lost.

Guiding Principles for Sustainable Development Page 6, "Identify significant and iconic heritage items and places throughout the shire" is so relevant.

The Shire as a whole has suffered when important heritage is destroyed, or allowed to decay or be vandalised. Developers should be encouraged to realise how preserving history and heritage can add value.

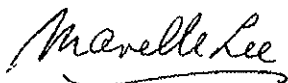
Because Ballina Shire's population is forecast to rise by 50% ie from 16,720 by 8,400 in 2031, increasing heritage challenges are likely.

Tourists as well as local residents are interested in, and can contribute to, preservation of the history of this region, whether built, environmental, cultural or Aboriginal.

Thank you for the opportunity to comment

Yours sincerely

Marelle Lee.



Planning Resolutions

plan – manage - resolve

Phone: (02) 66859957

Mobile: 0437 859959

Email: chris@planningresolutions.com.au

Mail: PO Box 1133
Byron Bay

Paul Hickey
General Manager
Ballina Shire Council
PO Box 450
Ballina 2478

Attn Simon Scott

Dear Paul,

Re: Submission in regard to the Draft Ballina Shire Council Growth Management Strategy

I act on behalf of the two major landowners of Cumbalum Precinct B. I make the following submission in regard to the Draft Ballina Shire Council Growth Management Strategy.

While my clients are please that Cumbalum Urban Release Area Precinct B is included in the Draft Ballina Shire Council Growth Management Strategy they are surprised and dismayed that the following paragraph was inserted into the draft as one of the Cumbalum Locality Objectives:

- *Preference for development to proceed as a south to north progression to maximise the efficient delivery of infrastructure.*

This objective for Cumbalum is contrary the following statement in the staff report to Council on 24 November 2011 supporting the public exhibition of the Planning Proposal for Cumbalum B:

it can be argued that subject to infrastructure being available, the development of land within Precinct B concurrent with continued development of Precinct A may have benefits with respect to increased competition in the marketplace, land availability and housing affordability.

Council's Cumbalum Infrastructure Delivery Plan of June 2011 has clearly set out how Cumbalum Precinct B can be serviced independent of Cumbalum Precinct A. There is no need for a south to north servicing regime.

Further this proposed Locality Objective is contrary to the intent of Part 4 of Council's resolution of 24 November 2011 where in the Council resolved;

4. That Council advise the proponent and the NSW Department of Planning that notwithstanding the Council's endorsement for the public exhibition in point one above, the Council will not proceed further with any consideration of the draft proposal until a strategy is confirmed that satisfactorily addresses Council's significant concerns in relation to infrastructure servicing issues.

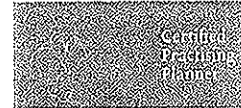
As a result of this Council resolution the proponents of Cumbalum B provided Council with a Voluntary Planning Agreement on 1 May 2012. The Voluntary Planning Agreement sets out the proponent's infrastructure commitments for the development of Precinct B. This Voluntary Planning Agreement was extensively based on the advice provided by Council in their letter of 16 April 2012. The Voluntary Planning Agreement provides that the proponents will:

- a. Forward fund Council's sewerage, water and recycled water services to Cumbalum Precinct B,
- b. Pay a voluntary contribution from the sale of each lot to ensure the upgrading of the highway interchanges when required,
- c. Ensure internal roads, intersections and open space are provided by the proponents in a timely way.

I ask that Council adopt the Ballina Shire Council Growth Management Strategy such that the development of Cumbalum Urban Release Area Precinct B can occur independently of the development of Precinct A.



Yours faithfully
Chris Pratt
Planning Resolutions
1 June 2012



Cc Jim Clark, Department of Planning and Infrastructure

Matthew Wood

From: Simon Prendergast [simon.i.prendergast@gmail.com]
Sent: Sunday, 17 June 2012 11:51 PM
To: Simon Scott
Cc: Terry Prendergast; Sue Prendergast
Subject: Re: Draft Growth Management Strategy

Hi Simon, I tried to send this before leaving town on Thursday, but found it remaining in my outbox when I returned today - Sorry if you have already received this but I figured it would be better for get two copies rather than none at all. Thanks, s p

Thank you for the opportunity to continue our dialogue with Council regarding the development of the Growth Management Strategy. Terry and Sue are overseas at the moment, and it has been difficult to prepare a considered submission to the draft exhibition, I hope this note may appropriately raise some matters on their behalf that relate specifically to **Lot 2 DP 253899, 1336 Teven Road, Alstonville on the northern boundary of Alstonville.**

We have been working with Council for a long time on the rezoning of the land to reflect its current use and best potential use and we have been proactively seeking resolution of a number of outstanding issues which can be resolved through the appropriate zoning, current significant conflict of land use and possible future development or public use of the land. We are dismayed by the dismissive comments (below) made by the LEP committee which has failed to understand cases we have made before council or the amenity our property provides at our expense to the community. Furthermore, the circular nature of interconnectedness of the LEP process and growth management strategy (which states that retaining the Alstonville footprint is a significant locality objective) has not allowed independent and logically reasoned assessment of the necessary rounding off of the Alstonville footprint.

"Council has maintained its policy with respect to limitation on lateral expansion of Alstonville for many years. The Draft LEP has been prepared on this basis. Given this and the absence of a broader strategic investigation into the need for and suitability of expansion for residential development in the Alstonville locality no change [to the draft LEP] is recommended."

In 1986 council applied 7(i) zoning on the property in question without any notice or consultation and contrary to advice from then State Planning Commissioner Simpson who made assurances that rounding off of the Alstonville footprint would occur and allow for development in line with a prior approved subdivision on the property. This has not occurred and council has repeatedly failed to adequately respond to this matter. Council's reluctance to discuss alternative land use options with us is confusing and does not present a transparent case or acknowledge significant changes have been made to zoning on our property without proper or reasonable consultation. We hope this submission starts dialogue which will result in reduced conflict of land use and improved public amenity as well as make use of services already in place to avoid the economic and environmental impact of greenfield development sites like the Cumbalum proposals.

It is extremely disappointing that the Draft Growth Management Strategy has been prepared with the premise that the Alstonville footprint is maintained as is - this is a specific constraint that such a strategy should question and a study of the social, environmental and economic benefits of further development around Alstonville, particularly where significant land use conflict exists and where rounding off of the town footprint may be accommodated with appropriate buffering to other properties and council lands should be made and compared to proposed greenfield development and other infill opportunities.

The specific guideline offered by the NSW department of planning *PN 09-002, STANDARD INSTRUMENT FOR LEPS, 30 April 2009* on the environment protection zones in the planning standard instrument and how they are to be

applied in the preparation of local environmental plans. It is clear that E3 zoning with respect to Lot 2 DP 253899 is contrary to the zoning objectives, proposed application and stated uses provided by *PN 09-002*. The land has no defined special ecological, scientific, cultural or aesthetic attributes that currently require management nor does it satisfy any of the other criteria outlined by the Standard Instrument.

The zoning of Lot 2 DP 253899 as E3 (or any other zone) must be supported by a clear and robust strategy, possibly in the form of an environmental study, this has not occurred. Under such a strategy or study, zoning would need to be appropriate and land uses would need to be capable of being sustained, the issues associated with land use conflict relating to Lot 2 DP 253899 remain unresolved and need urgent, transparent and considered attention by council and the LEP process. We request that as part of the Draft Growth Management Strategy development this type of study is undertaken and due consideration is given to the history of the zoning associated with this parcel of land as well as an independent assessment of the benefits and concerns associated with small amounts of urban rounding off to mitigate conflict of land use.

Rezoning and subsequent development of the land would be carried out under close cooperation with council to provide public access to Maguires Creek and possibly make use of a currently stranded pedestrian easement on our property that runs along both sides of the creek and alleviate the current land use conflict that exists. The property contains high value qualities conducive to housing with respect to the accessibility to services and is consistent with lands sought as part of Council's strategic actions to identify opportunities for additional seniors living accommodation and the affordable housing strategy.

We would appreciate a considered response to the issues raised by this correspondence and look forward to working with yourself and council to progress these matters in an appropriate and mutually agreeable manner.

Yours sincerely,

Simon Prendergast

on behalf of Terry and Sue Prendergast


Newton Denny Chapelle
 SURVEYORS PLANNERS ENGINEERS

Date: 7 June 2012
 Our Ref: 12/093

General Manager
 Ballina Shire Council
 PO Box 450
 BALLINA NSW 2478

Attention: Mr Simon Scott

**RECORDS
 SCANNED**
12 JUN 2012
 Doc No. _____
 Batch No. _____

Dear Sir,

**Re: Submission – Draft Ballina Shire Growth Management Strategy (May 2012)
 Lot 1 DP 1168781, 184 Rifle Range Road, Wollongbar.**

INTRODUCTION

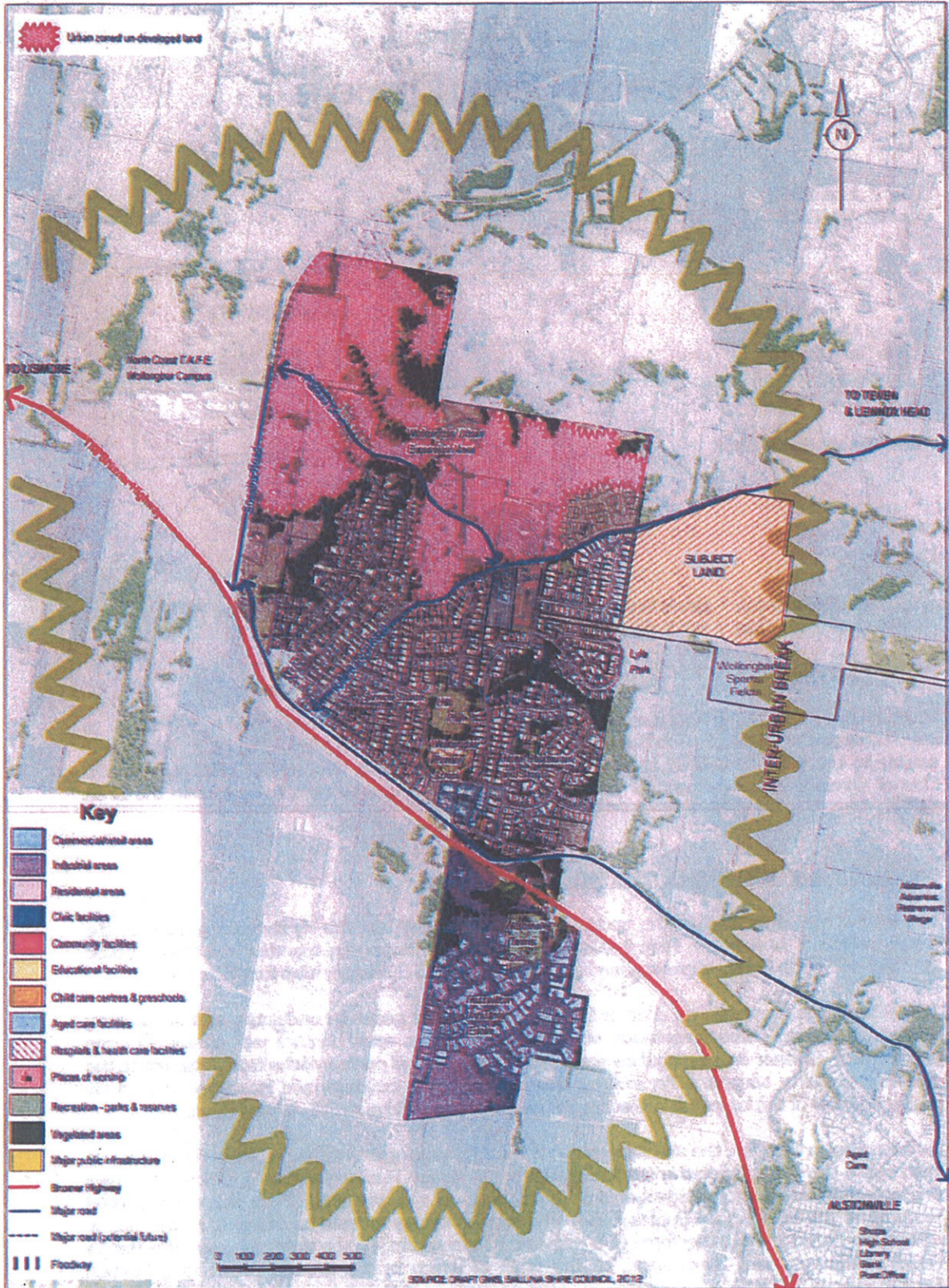
Newton Denny Chapelle (NDC) has been engaged by Tabaion Pty Ltd to prepare a submission to the exhibition of the Draft Ballina Shire Growth Management Strategy May 2012 (Draft GMS) as it relates to Lot 1 DP 1168781 located at 184 Rifle Range Road, Wollongbar. NDC appreciates Council agreeing to our request for an extension to the closing date for submissions to the Draft GMS.

DESCRIPTION OF SITE AND SURROUNDS

The subject site is located to the south of Rifle Range Road, on the north-eastern edge of the existing village of Wollongbar. **Plan 1** illustrates the location of the site, together with the approved Wollongbar Sports Fields, superimposed onto the Draft GMS Summary Map for Wollongbar.

184 Rifle Range Road has an area of 27.42 hectares. It is generally undulating and is currently utilised for grazing cattle. Vegetation on the site comprises open pasture with scattered large shade trees. Steeper drainage gullies are located in the central portion of the block adjacent to the southern property boundary. An existing dwelling and farm buildings are located in the south-eastern corner of the lot, which are accessed via a driveway linking to Rifle Range Road.

As illustrated in this plan, the site is bound on 2 sides by existing and approved urban land uses. In this regard, the site is located immediately adjacent to Avalon Residential Estate, which comprises predominately low-density residential lots. To the south of the site is Lyle Park and the approved footprint of the Wollongbar Sports Fields. The rural property located to the east of the site is utilised for horticulture in the form of a macadamia plantation. To the north (across Rifle Range Road) comprises rural zoned land, to the west of which is the broader Wollongbar Urban Expansion Area (WUEA).



Client: TABALON PTY LTD & NECELLE PTY LTD

Location:
 LOT 1 DP 1168781
 184 RIFLE RANGE ROAD WOLLONGBAR

Drawn: CD

NDS
Newton Denny Chapelle
 Surveyors Planners Engineers

Email: office@newdennychapelle.com.au
 Lismore Casino
 37 Campbell St Lismore 2480
 Phone: 075521 4088 Fax: 075521 4088

PLAN 1 -
**SUBJECT LAND SUPERIMPOSED
 ON DRAFT GMS WOLLONGBAR MAP**

Date: 6.06.12

Scale 1:20000 @ A4

Ref No: 12/093

SUBMISSION

This submission to the Draft GMS is requesting that Council reconsider the proposed planning strategy presented in the Draft GMS as it relates to Lot 1 DP 1168781. More specifically, our clients request that Council amend the Draft GMS to provide for future residential development to occur on the subject land. The reasons for this request are summarised as follows:

- a) Suitability of the site to accommodate urban development;
- b) Existing urban/rural land use conflicts associated with adjoining Avalon Estate;
- c) Need for a strategic shire-wide approach to addressing future residential land supply; and
- d) Opportunity for improved accessibility to the approved Wollongbar Sports Fields.

Each of these issues are outlined in more detail below.

A. Suitability of the site to accommodate urban development

As outlined above, the site is located on the fringe of the existing urban area of Wollongbar and presents a logical expansion of the village footprint. Whilst detailed assessment is still to occur with respect to the environmental and physical constraints of the site, a preliminary assessment concludes that the site is largely void of significant environmental planning constraints. In this regard, the site:

- Largely comprises open pasture with scattered shade trees and therefore appears to be free of sensitive natural environments;
- Is not identified as being bushfire prone or contaminated land;
- Predominately comprises a gently undulating landform (other than several drainage gullies located to the south of the site); and
- Is readily able to be serviced with urban infrastructure via conventional means.

A conceptual layout for the property is provided at Plan 2. Whilst the layout would need to be refined following detailed investigations, the attached plan demonstrates that the site has the capacity to provide for a significant quantity of residential land, in addition to significant buffers to the horticultural activities located to the west of the site and more modest buffers to the existing residences to the south of the property. The strategic location of the site also provides opportunities for the future expansion of the Wollongbar Sports Fields if required by Council. Furthermore, pedestrian linkages are available through to Avalon Estate via a 3m wide pathway provided on the applicable deposited plan (DP 1045140) - which links our client's land to Hellyar Drive. The presence of this linkage indicates that Council had regard to the possible future requirement for connectivity as part of the assessment and determination of the Development Application for Avalon Estate (DA 2000/466).

It is acknowledged that the subject land is located in an area recognised for its agricultural values. However, given the issues outlined in item "B", below, the suitability of the site for agricultural pursuits (particularly more intensive horticulture) has already been compromised by the approved residential subdivision immediately adjoining the property.

B. Urban/rural land use conflicts associated with adjoining residential uses

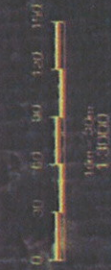
In 2009 Ballina Shire Council adopted DCP Chapter 18 - Rural Land. A key element of the planning framework introduced in the DCP related to a requirement for Council and applicants to consider the impacts of proposals on the ongoing viability of agricultural activities. As part of this, detailed Land Use Conflict Risk Assessments (LUCRAs) are required when non rural uses are encroaching into rural areas. One way of ensuring that impacts are minimised involves the provision of meaningful buffers between conflicting land uses, with the buffer provided on the same property as the encroaching land use.

DISCLAIMER

This preliminary report has been completed on an 'as-is' basis. The information provided by this report is for informational purposes only and should not be relied upon for any legal or financial decision. The client is responsible for ensuring that the information provided is accurate and complete. The client is also responsible for ensuring that the information provided is not used for any other purpose without the prior written consent of the author. The author is not responsible for any errors or omissions in this report. The author is not responsible for any consequences arising from the use of this report. The author is not responsible for any loss or damage of any kind, including but not limited to, direct, indirect, or consequential, arising from the use of this report. The author is not responsible for any loss or damage of any kind, including but not limited to, direct, indirect, or consequential, arising from the use of this report. The author is not responsible for any loss or damage of any kind, including but not limited to, direct, indirect, or consequential, arising from the use of this report.

LEGEND

- RESIDENTIAL AREA - 20.5 ha
- LARGER RESIDENTIAL LOTS & BUFFERS - 4 ha
- OPEN SPACE / RECREATION - 2.9 ha
- POSSIBLE ROAD CONNECTION



Amendments

| Date | Changes |
|-----------|--------------------------------------|
| B 7.06.12 | BUFFERS ADDED & ADJUSTMENTS TO A/C/S |
| C 7.06.18 | AREAS ADJUSTED |
| D | |
| E | |
| F | |

Client: TABALON PTY LTD & NICELLE PTY LTD

Location:
 LOT 1 DP 1168781
 184 RIFLE RANGE ROAD WOLLONGBAR

NBS
 Surveyors Planners Engineers
 Email: office@nbs.com.au
 Phone: 07 5522 1111
 100 BENTLEY ROAD, BENTLEY QLD 4008

PLAN 2 - CONCEPT STRUCTURE PLAN (INCLUDING APPROVED WOLLONGBAR SPORTS FIELDS)

Date: 7.06.12 Scale 1:30,000 OF A3 Ref No. 12/093 C

Drawn: CD

At the time that Avalon Estate was approved by Council via DA 2000/486, a less rigorous approach was applied to managing this issue than would be the case under the current Rural DCP. In this regard, the approach to manage land use conflicts adjoining our client's property involved the provision of a 10m strip stretching across the rear of the residential lots, with restrictions on title applied with respect to structures being built on this land. Plates 1 and 2 illustrate the adjoining residential lots relative to our client's property.



Plate 1 - Adjoining Residential Lots



Plate 2 - Adjoining Residential Lots

As demonstrated by the above photos, whilst this approach has ensured that the buildings are setback (albeit only 10m) from the property boundary, many of the properties do not have "urban" fencing of the rear property boundary or landscape plantings to buffer the urban uses from the adjoining agricultural activities. This arrangement has effectively transferred the responsibility of providing a land use buffer from the encroaching urban land use to the agricultural holding.

Given the above, our clients are limited with respect to the agricultural pursuits which can occur on the southern portions of their property with even the "lowest" agricultural use (grazing) being the subject of occasional complaints from neighbours.

C. Need for a shire-wide approach to addressing future residential land supply

Sea level rise associated with potential climate change has been identified in various parts of the Draft GMS as a constraint to development on the Ballina floodplain. Various actions within the Draft GMS relating to Ballina Island and North & West Ballina have highlighted the need for detailed assessment of the likely impacts of this issue. Subject to the outcome of this assessment, Council is likely to need to take a long term approach to accommodating additional population in areas free of flooding and sea level rise impacts, including areas in and around the villages of Alstonville and Wollongbar.

Since the 1980s, Council's position with respect to development on the Alstonville plateau has involved retaining the existing footprints of Alstonville and Wollongbar (including the WUEA) and accommodating additional populations in a third village on the plateau. The Draft GMS continues to advocate this as the preferred planning option, along with some minor infill for seniors living in Alstonville.

With respect to the concept of a third plateau village, Council will be aware that the previous investigations into this matter (in 2000/2001) elicited very strong views from a range of community groups and individuals impacted by the various site options under consideration at the time. Revisiting the third village (as proposed within the Draft GMS) can be expected to garner a similar level of debate in the future. Furthermore, the expansion of urban infrastructure (water, sewer, electricity, telecommunications etc) and the duplication of community facilities (such as pre-schools, playing fields and community halls) to a new village site would be a costly exercise and one which would adversely impact on the affordability of housing within a theoretical third village.

Given the above, it is considered timely for Council to reconsider the strategic approach for accommodating population growth on the plateau. An alternative approach would involve:

- a review of the existing "edges" of Alstonville and Wollongbar to determine whether there are areas which are relatively unconstrained and potentially suited to urban development; and
- a strategic examination of residential densities within the existing footprints of the plateau villages to determine opportunities for further intensification within the existing village footprints.

Such a review could be premised by a commitment to maintaining the planning principle of a rural buffer between and around the two existing villages - although clearly the boundaries of such a buffer is likely to shift as a result of the above assessment. We note that the urban buffers illustrated within the Draft GMS for other areas of the Shire (such as the East Ballina/Skemmar Head/Lennox Head area) are significantly narrower than that existing between Alstonville and Wollongbar. Accordingly, there would appear to be options available to alter the existing buffers, whilst still maintaining effective separation of the individual communities.

D. Opportunity for improved access to Wollongbar Sports Fields

The recently approved Wollongbar Sports Fields (DA 2011/373) includes the construction of public road access via an existing unformed road reserve to Ramses Street, Wollongbar. This road reserve has residential allotments backing on to it (to both the north and the south) and many residents of these allotments have objected to the construction of the road.

Whilst the playing fields project was able to demonstrate (via the Statement of Environmental Effects and development assessment process) that the future impact on these residences was acceptable, residents nevertheless remain concerned about the possible impact on their amenity.

184 Rifle Range Road is strategically located relative to the Wollongbar Sports Fields site and offers the opportunity for an additional road access linking the playing fields to Rifle Range Road, in a location which will minimise the alteration to the amenity of existing dwellings in the area. This alternate road would present a convenient access route for users of the sports fields travelling from outside of the existing village of Wollongbar. The Ramses Street access would remain, but would function more as a convenient access road for local residents.

CONCLUSION

In conclusion, the Ballina Shire Growth Management Strategy needs to consider the long term capacity of the Shire to accommodate population growth in a strategic manner. Whilst the Draft GMS has highlighted the potential planning constraints associated with accommodating additional development in the coastal areas of the Shire, the GMS does not provide for an adequate range of alternate options to accommodate this growth outside of the coastal areas.

Council's long term strategy of a third plateau village is likely to be as controversial in the future as it was in 2001 and the prospect of locating a suitable site with appropriate synergies to the existing plateau villages can be expected to be problematic. Furthermore, the infrastructure costs associated with the creation of a standalone village can be expected to be substantial and in conflict with Council's stated aim of improved housing affordability in the Shire.

Our client's property at 184 Rifle Range Road Wollongbar is relatively unconstrained and presents a logical extension to the existing urban footprint of Wollongbar. As such, it presents an important opportunity to accommodate, in a cost effective manner, some of the anticipated population growth in the Shire. On a more local scale, the development of the site also presents the opportunity for improved connectivity to the approved Wollongbar Sports Fields and the possible expansion of the playing fields site.

Given the above, Council is urged to reconsider the general planning approach applied to accommodating population growth on the Altonville Plateau. More specifically, Council is requested to incorporate our client's property at 184 Rifle Range Road as a Strategic Urban Growth Area within the Draft GMS.

Should you require any further information concerning the above, please do not hesitate to contact Mr Damian Chapelle of this office on (02) 6622 1011.

Yours sincerely

NEWTON DENNY CHAPELLE

Dan Chapelle

DAMIAN CHAPELLE

Town Planner. BTP. CPP.

