

**Attachment 4:**

**Draft Tweed Rural Land Strategy – Summary and response to submissions received during public re-exhibition (19 February – 19 March 2019)**

**By Submission**

**Notes:**

1. All proposed recommendations and amendments refer to the action number which appeared in the exhibited draft version of the re-exhibited version of the Draft Rural Land Strategy.
2. Themes do not always relate to themes listed in the re-exhibited version of the draft RLS.
3. Submissions from private individuals have been given a number only, while submissions from organisations, government agencies and councils have been identified using their full name.
4. Every attempt has been made to summarise the content of each submission to accurately reflect the comments made.
5. While the re-exhibition of the draft rural land strategy has sought primarily to seek feedback on the 25 amendments proposed by Councillors, additional comments have been welcomed and responses provided.
6. Because many submissions have raised common issues, responses have not been duplicated, but reference is made to earlier submissions listed in the table below.
7. Until such time as Council resolves to adopt amendments and make the final strategy, all amendments are draft and should not be considered the final position of Council.
8. Acronyms used in this table:

RLS – Draft Rural Land Strategy

LEP - Tweed Local Environmental Plan 2014

DCP - Tweed Development Control Plan 2008

MLS - Minimum lot size

DA – Development Application

DPI - Department of Primary Industries

OEH - Office of Environment and Heritage

LLS – Local Land Services

MO – Multiple Occupancy

While many submissions raised more than one topic, or did not make specific comments, a summary by number of submissions received is presented below as an indication only of the content provided. A total of 104 submissions were received.

Housing deletions (does not support)	83	Economic and employment	10	Policy directions	2
Housing deletions (supports)	6	RU1 Primary Production MLS	9	Sustainability	2
Due process and transparency	38	Multiple occupancies	6	Document structure	2
Lot size and subdivision	20	Tourism	6	Steep land, Dwelling entitlement	1 each
General comments	19	Environment	4	Illegal dwellings, Vision	1 each
Agriculture and rural enterprises	18	Increased flexibility	3	Aboriginal heritage, extractive resources	1 each
Community consultation	18	Climate change	2		

Action/Theme	Summary of submission	Response	Recommendation
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<b>Submission 1</b>			
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<p>Lot size Sustainability</p>	<p>Commercial avocado production like most horticultural tree drops have become broad acre pursuits of flat country. Avocado orchards no longer exist in Burringbar, and have gone back to weeds and forest including camphor laurel, lantana and exotic weeds. Much of the banana and dairy industry and other fruit and vegetable crops in the valley have suffered the same demise.</p> <p>Questions what forms of rural production would support 'sustainable agriculture and where the advice would come from.</p> <p>Proposes that intensive land use be encouraged on smaller suitable areas of up to 10 hectares and that land not suitable due to soils, topography etc. should be considered as land to come under the 10 hectare rule, where portions can be subdivided enabling a dwelling entitlement.</p> <p>The RLS should 'make public' figures obtained from the Bureau of Agricultural Statistics about the value of agricultural production over each decade from 1970 to now in the Burringbar valley.</p>	<p>Appendix 8 and 9 in the RLS provide a breakdown of allotment and property sizes which show that the majority of properties in the RU1 and RU2 zones are already substantially less than the MLS of 40 hectares. More than 70% are less than 10 hectares, and more than 60% are less than 5 hectares.</p> <p>The largest number and proportion of properties farmland rated, that is those properties which are used for productive agricultural purposes are the larger properties.</p> <p>Protection of agricultural land, and securing of flexibility for rural industries to develop in the future is a high priority endorsed by the Department of Primary Industries and supported in the RLS.</p> <p>Council provides advice to rural landowners on sustainable farming practices through its Sustainable Agriculture Officer.</p> <p>The strategy is not proposing a reduction in the MLS for the majority of rural zoned land.</p> <p>The resource Inventory prepared in the initial stage of the project and available for viewing on Council's website provides details of the more recent value of agricultural production.</p>	<p>No action recommended.</p>
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<b>Submission 2</b>			
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<p>Subdivision Lot size</p>	<p>Has previously provided original feedback on the earlier draft versions (2016).</p> <p>The paper does not appear to clearly call out situations where a rural land owner holds multiple adjoining lots but there is only 1 legal dwelling entitlement allowed on the whole landholding due to the rule established in the 1960s (that still stands today).</p>	<p>The need to determine if a dwelling entitlement exists, only relates to properties which are less than the MLS.</p> <p>A dwelling entitlement does not automatically infer that a dwelling can be built on an allotment, it merely means that a DA can be lodged for assessment</p>	<p>No action recommended.</p>
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	Suggests a change to subdivision lot sizes, only to allow existing lots less than 40 hectares created in the past to have an automatic dwelling entitlement attached.'	<p>against criteria established for assessing the merit of the application.</p> <p>The draft Strategy is proposing the creation of a Dwelling Opportunity Map onto which landowners can have their dwelling entitlement registered.</p> <p>Where the landowner is not sure if a dwelling entitlement exists, a two year period is proposed during which landowners can demonstrate that an entitlement exists.</p> <p>At the end of the two year period, landowners wishing to secure a dwelling entitlement would need to determine whether a dwelling entitlement was possible through the existing planning proposal (LEP amendment) process.</p> <p>The overwhelming majority of rural properties consist of a single allotment. However, should a property consist of more than one allotment, each of which is less than the MLS, the opportunity currently exists to merge allotments to create an allotment which meets the MLS requirement and obtain a dwelling entitlement.</p>	
<b>Submission 3</b>			
Subdivision on steep land	Concerned that small lot subdivisions on hills or steep slopes make it difficult to manage and maintain from environmental and ecological perspective.	The RLS is not proposing to create small lot subdivisions, especially on steep land.	No action recommended.
<b>Submission 4</b>			
Housing Actions 82, 83, 84, 87, 88, 89, 91 and 92	<p>Refers to previous submission (February 2018).</p> <p>Generally supported all items in the Implementation Plan Part 2b relating to previous version of the RLS.</p> <p>Noted that the Draft RLS was prepared by Council Officers with ongoing technical support from the RLS Reference Panel which comprised a broad cross section of community members.</p> <p>Submitted that Amendments 16 to 23 (being Action Items 82, 83, 84, 87, 88, 89, 91 and 92) should be reinstated in the final adopted RLS.</p>	All amendments proposed by Council in the re-exhibition version of the RLS, and any additional amendments proposed as a result of the review of feedback received during public exhibition will require a resolution of Council to determine whether amendments be adopted and included in the final version of the strategy or not.	For consideration of Council.

	Reinstatement of these actions does not in itself, result in any changes to Planning instruments or Council planning policies. It simply enables the next stage of the process to proceed, which would involve preparation of planning proposals and public exhibition.		
<b>Submission 5</b>			
General Process Housing	<p>There are some recommendations which need to be addressed but the essential thrust of the recommendations did not deserve to be rejected.</p> <p>The process is contrary to the Council's Engagement Strategy in that no explanation or reasoning has been offered for this approach; provided additional explanation.</p> <p>It was not and is not the obligation or responsibility of rural landholders to explain why the recommendations should be reinstated - it was and remains the obligation and the responsibility of Council to explain why the recommendations were rejected.</p> <p>There was no explanation why a second dwelling could or would cause a property to be split up.</p> <p>There are many reasons that warrant second dwellings being built; additional income, help children so they may stay with family, have on-site child care and to save money for the development of the farm; to bring aging family members to the hobby farm rather than see them enter a nursing home; to help keep undersize hobby farms viable to the extent that they produce any farm products, and for those ageing residents who have retired to hobby farms, to add a layer of extra security, home help and assistance in helping to maintain the property to a suitable safety standard.</p>	<p>Community engagement of the re-exhibition version of the RLS primarily sought feedback from the community on the proposed amendments, and the strategy overall.</p> <p>Until such time as Council resolves to adopt amendments and make the final strategy, all amendments are draft and should not be considered the final position of Council.</p>	For consideration of Council.
<b>Submission 6</b>			
Multiple Occupancies Action 24 Process	<p>Opposes deletion of Action 24 relating to opportunities to convert Multiple Occupancies (MOs) to another form of title.</p> <p>Proposes that unless options are provided the problems of scattered and unintended retirement villages will occur.</p>	Refer to response to Submission 5	For consideration of Council.
<b>Submission 7</b>			
Numerous Tourism	Critical to support economy of farm, protect agricultural land, encourage best practice, enhance the environment and areas of significant heritage, allow	The RLS seeks to achieve outcomes related to initiatives discussed in this submission through more than 130 actions which provide opportunity for	No action proposed

<p>Economic</p>	<p>sustainable tourism within both RU1 and RU2 zones in accordance with future infrastructure upgrades to promote growth potential.</p> <p>Proposes to work with local rural industry and landholders to develop niche activities, and potential of market driven cottage industries.</p> <p>Proposes development of communications strategies to allow access to basic services and knowledge.</p> <p>Have one designated 'go to' staff member perhaps for each village/zone who is accessible and knowledgeable.</p> <p>Develop a range of support strategies/information to allow new industry, ideas, or value-adding 'on-farm' in RU1 and RU2.</p> <p>Support home-based cottage industries.</p> <p>Develop economic drivers within the nature-based agri-business tourism sector.</p> <p>Signage at villages/gateways to be interpretative/colourful and all access.</p> <p>Cultural awareness supported, developed and promoted.</p> <p>Promote opportunities village-to-village.</p> <p>Weed identification and management workshops, promote 'weed free Tweed'.</p> <p>Need 24/7 telecommunications access which still do not exist in villages.</p> <p>Proposed roadside stall map.</p> <p>Promote walking or cycling where possible.</p> <p>Develop and encourage small events.</p> <p>Need Drone operation policy to prevent biosecurity, privacy breaches, and potential for criminal activity.</p> <p>TSC staff need to be mindful of businesses and not create events which cut off ability for small operators to earn income.</p> <p>Allow a variety of youth/aged activities to operate in the zones.</p> <p>Possible future aged care facilities in designated village growth areas.</p> <p>Integrated and varied transport plan with connections to villages and 'out-of-hours' services to hospitals.</p>	<p>innovation, diversification and value-adding and address the majority of concepts put forward in this submission.</p> <p>The operation of drones is a recent issue and has potential to cause conflict in rural and other areas.</p> <p>While Council is not in a position to control private use of drones, the Civil Aviation Safety Authority deals with matters of safety, and the Office of Australian Information Commissioner handles privacy concerns. There is currently no regulation to prevent the private use of drones over another person's property.</p> <p>Council is embarking on a range of initiatives to encourage connectivity within rural communities, including further development of the Rural Villages Strategy, Implementation of the Rural Land Strategy which proposes a range of actions, and the Rail Trail Project which will link a number of rural villages.</p>	
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**Submission 8**

Housing	<p>Objects to the latest changes, especially to secondary dwellings. Expressed concerns about lack of opportunity for the next generation to live and work the farm under parents mentoring.</p> <p>Proposes that there are no benefits of the proposed changes to agricultural production.</p> <p>Deleted actions should be reinstated.</p>	acknowledged	For consideration of Council.
<b>Submission 9</b>			
Agricultural production	<p>Tweed has an important role in food production and this needs protection from urbanisation.</p> <p>A farm is a farm and when suburban people live next to a dairy or other intensive farming practices, conflict ensues.</p> <p>Development never allows for large open spaces and large trees are prohibited due to small blocks etc. The Tweeds high diversity status will be wiped out and the loss of jobs and amenity will be the outcome.</p>	<p>The RLS seeks to minimise the potential for conflict between landowners and landuses through nine policy directions which seek to present a balanced approach to the future planning, development and management of rural land.</p> <p>The RLS proposes in Actions 2 and 3, the establishment of buffers, a buffer map, and the potential use of the RU6 Transition zone (Action 6) to provide separation between potentially conflicting landuses.</p> <p>A clear vision for the future of rural Tweed, as stated on page 11 of the RLS is crucial in development of guidelines and planning controls to ensure that the features most valued about rural Tweed are recognised, protected and enhanced through implementation of the RLS.</p>	For consideration of Council.
<b>Submission 10</b>			
Housing Agriculture	<p>Supports keeping the existing rules and regulations of the current RLS.</p> <p>Subdivision of farmland will impact viability.</p> <p>More housing will create more stress on our already crumbling infrastructure; roads and services etc. and will detract from diversity and outstanding scenery; the tourist dollar is important.</p> <p>The pressure of an increased population for the Shire should be resisted at all costs. Increased rural housing cannot be sustained due to lack of employment opportunities in the Shire.</p>	<p>See response to Submission 7 and 8.</p> <p>Through the more than 130 actions proposed in the RLS, innovation, value-adding and diversification are key outcomes once implementation of the RLS commences.</p> <p>The RLS is designed to provide the opportunity for innovation, value-adding and diversification at the higher strategic level, but is not able to enter the market to create demand.</p>	For consideration of Council.

	<p>More housing would have an impact on the environment as regards water absorption and run off during heavy rains.</p> <p>A quick fix of selling a bit of land is only going to make the financial predicament of farmers worse.</p> <p>The problems with modern day farming has not been addressed by any Government; State or Federal.</p> <p>Perhaps Council can support and encourage farmers to look for alternative methods of farming and farming practices to create a sustainable micro form of agriculture would increase the tourist attraction of the Shire and possibly increase the viability for the farmers.</p> <p>Being pro-active as opposed to selling off the land for a quick buck.</p>		
<b>Submission 11</b>			
<p>Housing Actions 82, 83, 84, 87, 88, 89, 91 and 92 Process</p>	<p>Submit that Amendments 16 to 23 (being Action Items 82, 83, 84, 87, 88, 89, 91 and 92) should be reinstated into the final adopted RLS.</p> <p>States that it is difficult to understand why Council is now proposing to delete nine actions and change the intent of seven actions all of which relate to additional rural land uses.</p> <p>There is no commentary in the exhibition material explaining the rationale behind the changes and deletions which are fundamental to achieving the objectives of the Strategy and delivering sustainable and balanced rural land use outcomes.</p> <p>Reinstatement of these actions does not, in itself, result in any changes to planning instruments or Council's planning policies, it simply enables the next stage of the process to proceed.</p> <p>Provided copy of submission to previous stage of project seeking part of property included in any supply and demand analysis under proposed Action 89.</p>	<p>Acknowledged. Refer to response to Submission 4</p>	<p>For consideration of Council.</p>
<b>Submission 12</b>			
<p>Detached Dual Occupancy Rural Workers Dwellings</p>	<p>Detached Dual Occupancy and Rural Workers Dwellings should be allowed on the basis that these decisions will substantially help keep farming alive in the Tweed.</p>	<p>Acknowledged. Refer to response to Submission 4</p>	<p>For consideration of Council.</p>

Agriculture	<p>The family property was sold due to hardship, but a detached dwelling would have saved the farm and could have had an income from rent during droughts, floods and cyclones, during bumper crop years.</p> <p>In Tweed Shire, farming land is talked about as if it is a precious resource but fail to treat it as such by ensuring farming in this region is economically sustainable.</p> <p>Allowing a detached dwelling (like every other local council) would go a long way to helping; as a way of subsidising farming with such small negative impact on farming land and substantial positive impact on the sustainability of farming.</p> <p>The amendments to the RLS seem rushed. They seem to not take into account the shared views of Tweed farmers.</p>		
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**Submission 13**

Housing Consultation	<p>The combination of vision and policy direction is supported, reflective of desirable outcomes.</p> <p>Proposed that a key next step for the RLS is to recalibrate with landowners to better appreciate the actions necessary to generate further investment, support diversification and create a more productive rural landscape.</p> <p>Relaxation of the rural workers dwelling criteria would be of benefit.</p> <p>The increase from 10ha to 40ha in the RU1 should not be pursued.</p> <p>Improved community consultation is needed; has spoken to many farmers who had no idea this document existed, let alone have time to read it. Ensure targeted and meaningful community consultation as opposed to the blanket approach which has not enabled balanced outcomes to be generated to-date.</p> <p>Permit Dual Occupancy (detached) within the RU1 and RU2 zones, in keeping with the remainder of the Far North Coast Council's.</p>	<p>It was never an intention to remove any dwelling entitlements by increasing the MLS in the RU1 zone, but to retain them by addition of properties onto the Dwelling Opportunity Map as discussed in Appendix 8 and detailed in Action 10.</p> <p>Prior to public exhibition, landowners from Upper Burringbar who raised concerns were given an assurance that the MLS would not be changed unless further investigation and consultation occurred.</p> <p>This undertaking has not changed and it is proposed that further investigation and consultation occurs prior to making a decision whether to increase the MLS or not.</p>	<p>For consideration of Council.</p> <p>That the proposed amendment to Action is supported to ensure that dwelling entitlements on RU1 (10 hectare MLS) zoned properties are retained.</p>
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**Submission 14**

Housing Process	<p>Objection to the last minute amendment to the RLS.</p> <p>Have not given majority of rural property owners in the shire enough time and notice of the last minute amendments.</p> <p>This document once finalised will have a lot of long lasting repercussions that will affect what owners of rural properties can and can't do with their properties</p>	<p>Acknowledged</p> <p>Refer to response to Submission 4</p> <p>The RLS is proposing two types of second dwelling:</p> <ul style="list-style-type: none"> <li>• Dual Occupancy (Detached) on properties equal to or greater than 40 hectares, and</li> </ul>	<p>For consideration of Council.</p>
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	<p>and will have a bearing on the economic health and growth of the rural community and whole shire.</p> <p>On the whole does not have a problem with the document previously on display.</p> <p>Lack of ability to build a second dwelling on a rural holding that has not been disclosed properly and is very much a step in the wrong direction.</p> <p>As farming becomes less and less profitable farmers need to become more intensive and or diversify or slowly go broke and leave the land. Loss of farms could lead to weed problems. Loss of farming families will impact the social and the economic health of rural communities.</p> <p>Submission also listed a range of benefits of allowing a second dwelling.</p> <p>Only taking about a second dwelling not subdivision. Therefore it is not unplanned urbanisation. A second dwelling should not cause a problem in regards to future urbanisation if planned right.</p>	<ul style="list-style-type: none"> <li>• Secondary Dwellings on properties equal to or greater than 10 hectares.</li> </ul>	
<b>Submission 15</b>			
<p>MO and Community Title Process Consultation</p>	<p>Opposed to Amendment 24 and Action 93 removed from the Draft Rural Land Strategy.</p> <p>Requesting that Council will provide an instrument as has occurred in both Byron and Lismore shires that allows MOs to seek independent title for their land.</p> <p>Submission provides justification in research of Southern Cross University which emphasised that "Rural Landsharing Communities should be considered worthy of appropriate legal protection. Such legal protection would best be provided by the enactment of legislation granting legal rights in relation to the transfer of members' equitable interests in land, whether such transfers are by way of sale or succession...</p> <p>Devastated after years of pursuing better outcomes for an outdated MO model and feel that as community members we are undervalued and not represented.</p>	Refer to response to Submission 5	For consideration of Council.
<b>Submission 16</b>			
<p>General Process Agriculture</p>	<p>The council has failed to meet the Community Engagement Strategy (CES) standards in respect of the amendments proposed.</p> <p>There must be no subdivision of existing productive and viable rural land holdings; but unproductive and unviable portions of rural landholdings must be</p>	<p>Second submission by the same author; refer to Submission 6.</p> <p>With respect to subdivision for agricultural purposes, amalgamation of land for agricultural purposes is currently possible under the clause 4.2 of the Tweed</p>	For consideration of Council.

<p>Subdivision Housing</p>	<p>available to be subdivided from those productive and viable portions of the property.</p> <p>There is an unnecessary confusion by Council about the question of dual occupancy. There are rural landholders who wish to subdivide a small portion of their property which cannot be made viable for agricultural purposes because of land conditions, environment, terrain issues or other issues.</p> <p>As part of the Rural Land Strategy it is important to specify that a second dwelling cannot be owned by any person other than the owner of the respective rural land holding on which it stands.</p> <p>The community overall would be better served if there were more people shifting into the rural area without diminishing existing viable and productive agricultural land.</p> <p>The Rural Land Strategy has a focus on the size of the rural land rather than on the use, utility or viability. Defining property based on land size rather than on each respective farm's capacity for primary production or even viable farming purposes is probably the most ineffective way of applying LEP rules.</p> <p>DPI philosophy of retaining broad acre farms may be appropriate west of the ranges but in the hinterland shire areas with rolling hills and vast tracts of valleys, hillsides and native trees to protect slopes, broad acre farm philosophies are totally inappropriate.</p> <p>Supports proposed amendments 1, 2, 3, 4, 5, 7, 8, 12, and 25.</p> <p>Agrees with Amendment 11 'intent of Action' rejects text with 'strikethrough'.</p> <p>Rejects proposed amendments 6, 9, 10, 13, 14, 15, 19, 20, 21, 22, 23, and 24.</p> <p>Proposes altering amendments 16 and 17 so that Dual Occupancy with consent is permissible on any RU1 and RU2 property (regardless of size) without resorting to subdivision and owner strictly retaining sole ownership of both dwellings.</p> <p>Amendment 18 (Rural Workers Dwellings); rejects the amendment - agree with original recommendation but recommends that it be changed to "Amended Tweed LEP 2014 Erection of rural workers dwellings in the zones RU1 and RU2 subject to restrictions based on justifiable and reasonable needs, appropriate size and quality of facilities.</p> <p>Viable and productive rural land should not be subdivided – but rural land which cannot be used economically for viable and productive agriculture can be subdivided. The MLS should only apply to viable and productive rural land holdings - regardless of the total size of a rural land holding.</p>	<p>LEP 2014 and is not likely to impact existing use rights for dwelling constructed prior to commencement of IDO 1 in 1964; however, the clause appears to be limited to the ability of an allotment to be subdivided for agricultural purposes, only if the remnant allotment that contains the house is at least the size of the MLS.</p> <p>The Draft Strategy is proposing that the MLS be reduced to allow amalgamation of agricultural land where the house lot created is undersized.</p> <p>The RLS has considered both property size, allotment size, and as far as is possible, the likely use of the land. As Figures 27 and 28 in Appendix 9 of the RLS show, there is a direct relationship between property size and the potential use of the property for agricultural purposes, the larger the property the more likely it is to be used for agricultural purposes.</p> <p>The Right to Farm policy now embedded in the new Primary Production and Rural development State Environmental Planning Policy raises the need to prevent landuse conflict, which is supported by the department of Primary Industries and raised as a concern by the rural landowner.</p>	
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	<p>There does not seem to be any explanation why a property which is 1 hectare or above in size, should not be allowed to have a dwelling built on the property, provided reasonable distances between building and the set back and the boundary fences are maintained it should be proper for an owner to build a dwelling.</p> <p>The fact that significant negotiated recommendations were struck down by the Council without explanation shows a considerable predetermined bias against those recommendations; then requiring rural landholders to argue why the recommendations should be reinstated only reinforces the perception of bias by Council.</p> <p>Procedures used in this matter have not been applied fairly and do not reflect well on Council's community engagement undertakings.</p>		
<b>Submission 17</b>			
<p>General Housing</p>	<p>Support councillor's recommendations that the current restrictions remain in place for rural zoned properties and not allow more dwellings to be built on properties.</p> <p>Support the 25 amendments, particularly numbers 16 through 24 relating to changes to the current restrictions in place for housing types on rural properties.</p> <p>Any increase in population on will increase the potential for rural land use conflict.</p> <p>With an increasing amount of new opportunities for local, domestic and export markets arising; incorporate with our thriving agri-tourism industry and we have opportunity to utilise every acre we have.</p>	<p>Acknowledged</p>	<p>For consideration of Council.</p>

<b>Submission 18</b>			
General Process Housing	<p>The people who for generations have lived and worked the same land have no say in what is occurring.</p> <p>The majority of farmers are struggling, they are having to work off farm just to survive. They need to have the ability to produce an extra income stream to enable them to work their farms. This will increase productivity, control weeds and rebuild the rapidly deteriorating infrastructure such as buildings and fences.</p> <p>Farmers are ageing rapidly, they need the assistance of their family members to assist in the running of the farms. The option of an extra dwelling on the farm would help with this.</p> <p>Farmers don't want to subdivide their farms and put it under housing.</p>	Acknowledged	For consideration of Council.
<b>Submission 19</b>			
Public exhibition Consultation	Concerned about lack of knowledge of strategy and seeks extension public exhibition period.	Acknowledged	For consideration of Council.
<b>Submission 20</b>			
Housing Dual occupancy (detached)	Are not looking to subdivide but are looking to have detached dual occupancy for next generations on 10 hectares and above on the same property to assist with farming operations or provide a stable rental income.	Acknowledged  The RLS is proposing two types of second dwelling: <ul style="list-style-type: none"> <li>• Dual Occupancy (Detached) on properties equal to or greater than 40 hectares, and</li> <li>• Secondary Dwellings on properties equal to or greater than 10 hectares.</li> </ul>	For consideration of Council.
<b>Submission 21</b>			
General Lot size Economics Process Housing	<p>Questioned when has Council ever considered changes to the 40 hectare minimum lot size.</p> <p>Questions why the RLS is not a 'standalone' strategy and raises concern about a tractor shed not being permitted because the Aboriginal Heritage Strategy overrode the Rural Land Strategy.</p>	Acknowledged  The right to farm is supported by a range of proposed actions, along with support for innovation, diversification and value-adding which it is hope will assist in supporting greater income generating opportunities on rural properties.	For consideration of Council.

<p>Agriculture Consultation</p>	<p>In times gone by roadside stalls were a vibrant concern and tourist attraction but TSC has succeeded in forbidding such things.</p> <p>TSC policies do nothing to support rural economic development.</p> <p>The most affected stake holder, the rural land owner, has not been provided “procedural fairness” throughout the entire RLS.</p> <p>Amendments under Policy Direction 5 are a major impediment to the viability of the rural sector of the Tweed Shire. Provides details supporting the need for additional housing.</p> <p>A right to farm is a right all primary producers should have and TSC and the RLS need to provide adequate protection when neighbours complain.</p> <p>Communications need to reach the land owners, remembering many are elderly. Contact would be more successful if necessary communications were mailed to residential addresses. To put such matters in the Daily News or Tweed Link is not good enough as these papers are not fully distributed throughout the shire.</p> <p>Many of the “amend” actions in the RLS have been altered to “investigate”... What does this mean? Are changes going to be indefinitely delayed?</p> <p>Tweed Shire Council is out of step with surrounding shires and must realise that rural land owners need the right to have a flexible and merit based subdivision of land under the current 40 ha minimum size.</p> <p>The RLS needs to be a standalone document which is comprehended by all and has had adequate consultation and involvement of those concerned.</p>	<p>As Appendix 8 and 9 of the RLS shows, extensive investigation and analysis of allotment and property sizes has occurred, not just 40 hectares.</p> <p>The analysis shows that more than 70% of allotments are less than 10 hectares and more than 60% less than 5 hectares. The extent to which rural land has been subdivided has been extreme and left relatively few larger properties.</p> <p>‘Resource Access’ is a term applied by the Department of Primary Industries to identify the need to protect remaining agricultural land for productive agricultural purposes; further subdivision of rural land is seen as a threat to resource access through fragmentation and increased potential for conflict between non-agricultural residential desires of new arrivals and those farmers seeking to operate legitimate agricultural activities.</p> <p>Refer to response to submissions above.</p>	
<p><b>Submission 22</b></p>			
<p>General Process Housing</p>	<p>Considers the RLS is a well-researched, evidence backed strategy that provided logical basis for the approach in it.</p> <p>The re-exhibited draft Strategy does not fit the stated vision or how that vision is to be achieved as set out in Part 1. There does not appear to be any evidence based reason for the changes.</p> <p>The original strategy provides the best, and an appropriate, rural land strategy for the Tweed, for the reasons in it.</p>	<p>Acknowledged</p>	<p>For consideration of Council.</p>

<b>Submission 23</b>			
<p>General Flexibility Agriculture</p>	<p>Provides a personal perspective the realities of farming in Tweed Shire and in particular on land now zoned RU2 - Rural landscape.</p> <p>Many farmers took advantage of concessional lot provisions to acquire more land (and they are still farming today because of this) or invest off farm to provide an income independent of the vagaries of farming or to update machinery and infrastructure.</p> <p>The study's use of outdated northern rivers figures is not indicative of the Tweed and casts into doubt the integrity of the study.</p> <p>Unless a RLS can be developed that truly reflects the reality, as explained above, and offers flexible planning controls to assist present farmers to diversify or encourages new farmers to come to the Tweed to establish themselves in new, intensive modern food production methods then the RLS will oversee the continued demise of farming in the Tweed Shire.</p> <p>The RLS is strong on rural landscape and scenic amenity issues but weak on meaningful farming issues.</p> <p>The RLS contains many "feel good airy fairy statements" in relation to farming and looking at TSC's past record re previous studies, the reality is that most of these will never be implemented.</p>	<p>Figures provided in the Resource Inventory developed in Stage 1 of the project which reflect the status of the region have not been used to interpret the status of Tweed, they are a snap shot in time which relate to the area for which they are reported and were not the only basis for decisions based within Tweed Shire.</p> <p>The RLS proposes more than 130 actions which seek to support innovation, diversification and value-adding and provide greater flexibility and transparency in the planning system, but is not proposing a reduction in the MLS for the majority of rural Tweed, 70% of which is already less than 10 hectares.</p> <p>The RLS was originally developed with a strong focus on implementing the intentions of all nine policy directions. These policy directions include protection of agriculture, promotion of tourism, environmental protection, with no single policy direction being given precedence but part of a balanced approach to establishing the future of rural Tweed.</p> <p>Following adoption by Council, an implementation plan will be prepared which will be reported to Council for endorsement and commencement.</p>	<p>For consideration of Council.</p>
<b>Submission 24</b>			
<p>Housing Actions 83, 84, 87, 88, 89 and 91</p>	<p>Concerned about the potential impact of the changes proposed in the RLS specifically Policy 5 actions 83, 84, 87, 88, 89 and 91.</p>	<p>Acknowledged</p>	<p>For consideration of Council.</p>

<b>Submission 25</b>			
Housing	<p>Supports amendments which stop secondary dwellings on rural properties outside of existing villages and clusters.</p> <p>Landowner has spent life savings on home knowing that the planning laws did not allow neighbours to build next to them.</p> <p>Has done all possible to farm the land without people complaining about noise from the farm, like machinery and poultry or the early working hours.</p> <p>Placing more dwellings on rural lands greatly reduces the chance of the land being used for agriculture.</p> <p>Already have homes for 30,000 more people zoned in our towns and new developments.</p> <p>Let farming land be used for farming and if landowners are too old to farm the land let them lease the farm to younger farmers or sell like any other family business.</p>	Acknowledged	For consideration of Council.
<b>Submission 26</b>			
Housing Economics Vision Policy Directions	<p>Some proposed actions may not directly promote the vision and policy directions or could be expanded. By way of example, 'Policy Direction 5 – Greater diversity of rural housing' has limited supporting actions that seek to generate greater housing diversity, other than investigating small lot clusters (Action 95) and investigating rural village fringe areas (98).</p> <p>Supports further exploration of employment and value adding opportunities.</p> <p>Encourages Council to consider such actions as an infrastructure audit and supply chain needs assessment to review and enable new rural land uses and infrastructure advancement, and in turn, Tweed's competitive advantages.</p> <p>Encourages the actions of the RLS to be further calibrated to more directly implement and give effect to the vision and policy directions.</p> <p>Utilise a more open planning framework to deliver the strategy, such as a more inclusive land use table, matched with zone objectives and DCP-based heads of consideration.</p>	<p>The RLS seeks to provide the opportunity for innovation, diversification and value-adding is not a market maker seeking to influence rural produce and business markets or marketing practices.</p> <p>The RLS has proposed review of the landuse table in the LEP to increase the range of permissible with consent landuses, improve zone objectives in the LEP and develop clear guidelines and planning controls in both the LEP and DCP to secure the desired future for rural land.</p>	For consideration of Council.

<b>Submission 27</b>			
Housing	<p>Support the amendments to the Rural Land Strategy: the placing of more dwellings in rural lands is not in keeping with the objectives of the rural land zoning and has the potential to greatly increase land use conflicts, thereby putting agricultural uses of the land under threat.</p> <p>Requests that secondary dwellings not be allowed on rural lands under 100 acres in either RU1 or RU2 zones.</p>	<p>The RLS seeks to support and enhance the objectives of the RU1 and RU2 zones.</p> <p>Current objectives of the RU2 Rural Landscape zone are:</p> <ul style="list-style-type: none"> <li>• To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.</li> <li>• To maintain the rural landscape character of the land.</li> <li>• To provide for a range of compatible land uses, including extensive agriculture.</li> <li>• To provide for a range of tourist and visitor accommodation-based land uses, including agri-tourism, eco-tourism and any other like tourism that is linked to an environmental, agricultural or rural industry use of the land.</li> </ul> <p>Objectives of the RU1 Primary Production zone are:</p> <ul style="list-style-type: none"> <li>• To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.</li> <li>• To encourage diversity in primary industry enterprises and systems appropriate for the area.</li> <li>• To minimise the fragmentation and alienation of resource lands.</li> <li>• To minimise conflict between land uses within this zone and land uses within adjoining zones.</li> <li>• To protect prime agricultural land from the economic pressure of competing land uses.</li> </ul>	For consideration of Council.
<b>Submission 28</b>			
Process Housing	<p>Expressed concerns about the process whereby the draft Strategy was amended without justification.</p> <p>The RLS is an authoritarian document completely out of sync with the rural sector; lacks flexibility.</p>	<p>Second submission from same author.</p> <p>Refer to response to Submission 32.</p>	For consideration of Council.

<b>Submission 29</b>			
Housing Agriculture	<p>Tourist facilities are already permitted on rural lands so people have alternate mechanisms for making profit from their land if they do not want to farm it anymore; need to keep this land for growing food resources in the future.</p> <p>Allow every block to have secondary dwellings will stop those blocks of 10 acres and above that are able to provide commercially viable food resources.</p> <p>Farms already have the option to have rural workers dwellings.</p>	Acknowledged.	For consideration of Council.
<b>Submission 30</b>			
Housing	<p>Supports detached dual occupancy on 10 hectares or more.</p> <p>Provides justification in relating to opportunity for children, reduction in farm accidents.</p> <p>Most farmers are dispirited due to weather conditions or by the belief that Council doesn't listen to their views.</p> <p>Few attend meetings due to time commitments.</p> <p>Workers cottages offer a chance to live and work in a rural area,</p> <p>Another house as a rental would give many farmers a sense of security when profitability of farms today is so uncertain, and be beneficial in addressing housing shortages.</p>	It was proposed that dual occupancy (detached) be permissible with consent on properties of 40 hectares or more, and secondary dwellings on 10 hectares or more.	For consideration of Council.
<b>Submission 31</b>			
Multiple Occupancy	<p>Deletion of Action 93 (Multiple Occupancies) is unwarranted.</p> <p>Raised concerns about being able to secure a loan for a property which does not have sole title.</p> <p>The MO concept was conceived in the 1970s and is due for an update.</p> <p>Conversion of MO title will not reduce farming or increase development.</p>	Acknowledged.	For consideration of Council.
<b>Submission 32</b>			
Agricultural land	<p>Raised concerns about loss of prime agricultural land and the ability of Council plans to be over-ruled by the State Government.</p>	Acknowledged	For consideration of Council.

<b>Submission 33</b>			
Housing	<p>The deletion of the action regarding second detached dwellings should be reconsidered. Second dwellings on rural properties provide lots of opportunities for the community and support the tiny houses movement that has been discussed and encouraged by council recently.</p> <p>Need to allow second dwellings in rural areas.</p>	Acknowledged	For consideration of Council.
<b>Submission 34</b>			
Tourism Housing Process Agriculture Economics	<p>Supports the original Draft Rural Land Strategy but not the amendments as put forward by Councillors.</p> <p>After the meeting on Wednesday hopes that the councillors will adopt what clearly the community and in particular the rural community have researched and endorsed.</p> <p>Farming on the Tweed is not the same as it was, most farms are now not sustainable and run the risk of being lost forever without progressive policies and a modern day thinking to marry the old with the new.</p> <p>Tourism, more diverse housing options and smaller boutique, profitable farms would be ways to help boost the economics of the region, individual farmers and the community.</p> <p>More employment opportunities, affordable housing and provisions to help the ageing population, in my opinion, are all essential for the survival of not only the rural community but the Tweed Region.</p>	Acknowledged	For consideration of Council.
<b>Submission 35</b>			
General Process Housing	<p>After years of negotiation and consultation with landholders, significant changes have been made to the strategy which limit the ability for landholders to generate off farm income and/or dispose of non-productive land.</p> <p>Not a rural landowner but believes this could negatively impact the viability of farming in the region rather than protect it.</p> <p>Greater consideration should be given to what the landholders themselves are asking for.</p>	Acknowledged	For consideration of Council.

<b>Submission 36</b>			
Housing	<p>The original plan of permitting a secondary dwelling or detached dual occupancy is a great idea and should be left in the RLS.</p> <p>Friends and families are needing to pool together to afford rural properties and to be able to maintain them. Having a second dwelling without being a "duplex" would make this possible.</p> <p>It is still to be proved by Council that it won't impact the environment or neighbours in a negative way; but does not see what the problem would be.</p>	Acknowledged	For consideration of Council.
<b>Submission 37</b>			
Housing Process	<p>Amendment 3, 4, 5, 7: Supports the move to short term actioning - Economic Development Strategy, Diversification and value adding e.g. rural tourism, sustainable agriculture.</p> <p>Amendment 9, 10, 11, 12: Supports diversification of land use of rural land as it underpins viability of farming business and robustness of surrounding local community businesses.</p> <p>Objects to removal of these actions 16, 17, 18, 19, 20, 21, 22, 23, 24 actions that relate to aspects of dual occupancy on rural landholdings of both under and over 40 hectares.</p> <p>A second dwelling will not affect a property value enough to make an expensive rural property less reachable for a less well-off person.</p> <p>Requests that the councillors proposing to withdraw the Amendments 16 through to 24 make publicly available their arguments to support their action and that they present them at an open community meeting.</p>	<p>Acknowledged</p> <p>The Mayor and other Councillors have attended at range of public forums to discuss the proposed deletions.</p>	For consideration of Council.
<b>Submission 38</b>			
Housing General	<p>Provided advice regarding allotments and properties owned by the author which have a dwelling entitlement.</p> <p>Refers to maps but map numbers do not reflect comment.</p>	<p>Development of a Dwelling Opportunity Map will occur during implementation, at which time landowners will be advised.</p> <p>Further consultation will occur during the implementation phase at which time details will be taken relating to specific properties.</p>	No action recommended

**Submission 39**

<p>Housing Subdivision Consultation</p>	<p>As small “lifestyle” or “hobby” rural land owners is introducing a new breed of Cattle to the Tweed. Established an orchard and a nursery of plants that we regularly sell at local markets.</p> <p>20 hectares is not a large enough property to work and create a sole income for a family, including paying a mortgage, however it is a substantial size that requires our whole family to pitch in and maintain, and holds a huge sentimental value.</p> <p>A second dwelling built would be able to assist us, and all other rural land holders, in many ways; assistance to the ageing population; as they age, they need more assistance with these jobs as it is too difficult for them. They don’t want to leave their property to either downsize or move into care.</p> <p>Due to property prices in the Tweed, siblings could not afford to purchase the property, but could care for parents on the property and help maintain and create something of the land with young and innovative ideas, growing the Tweeds production and economy.</p> <p>Family has emotional attachment and sentimental value to the land.</p> <p>Allowing a second dwelling would make farming business more viable – flood and drought-proof income. Alternate forms of income to survive and possible lessen working hours outside the rural property.</p> <p>The Tweed area does not have many large properties big enough to produce a sole income to support a family. This means that rural land holders need to source other forms of income, spending less time away from their property.</p> <p>Another option that rural land holders should have, is to be able to subdivide their properties to lessen the workload and maintenance required.</p> <p>Rural property prices are already extremely high and not affordable for young adults as they are, so wouldn’t a second dwelling allow for young farmers to treat the land with care even though they cannot purchase it.</p> <p>Concerns about the building of “McMansions” could be addressed with guidelines and requirements/ restrictions when building a second dwelling.</p> <p>Publicising changes on Council’s website and the Tweed Link is not sufficient and landowners did not know about the strategy.</p>	<p>Acknowledged</p>	<p>For consideration of Council.</p>
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<b>Submission 40</b>			
Housing	<p>If permitted to have a small, second dwelling on the property, it would enable owner to remain on the farm longer, caring for the land, and without disrupting the lives of their children due to work and travel.</p> <p>Are needing more assistance to maintain the property; in the neighbouring valley, there are so many older couples in the same situation who would benefit from the ability to house family or farm support, to enable them to remain in their own Homes in a small, secondary dwelling.</p> <p>The Federal Government has pledged additional funding to enable older Australians to remain in their own Homes with nursing care mobilised to members of the community in the form of Home Care Packages. This option will only be viable to us to remain in our own Home, if family are able to remain on the property to assist us.</p> <p>Small, safe dwellings could offer affordable housing to those who are unable to afford market value rentals and as such those vulnerable to homelessness would offered additional protection.</p> <p>Dwelling size could be small, but comfortable, so that individual families or workers can maintain a sense of their own self determination and independence.</p>	Acknowledged	For consideration of Council.
<b>Submission 41</b>			
Housing Illegal dwellings	<p>Housing options in rural areas, subdivisions and making dual occupancy detachable should be re-visited rather than removed in its entirety.</p> <p>Moving to detach dual occupancy is the most affordable housing option for rural farmers.</p> <p>The Tweed Shire Council should be using this rural strategy to address and provide sensible solutions to housing demand in rural areas and assistance in adapting to external economic changes, rather than shutting down this proposal.</p> <p>While restrictions are appreciated, it is not the same economy as what once was, and the council need to approach this openly and economically to build a sustainable future and cohesive community.</p> <p>Legalizing this will take the pressures off the Council having to audit properties in rural areas as well as minimizing work load enforcement for illegal dwellings.</p>	Acknowledged	For consideration of Council.

<b>Submission 42</b>			
<p>Housing Process Subdivision MOs</p>	<p>Objects to last-minute removal of some very important rights of land owners. Why should rural land owners be penalised for living in our shire when Byron, Lismore, Mullumbimby, Kyogle Grafton, Coffs Harbour and Tenterfield shires all are supportive to theirs.</p> <p>It is most important to the future of the rural community that detached dual occupancy on 10ha and above be allowed.</p> <p>Provides argument in support of additional housing, including the need for families to join together to be able to afford to purchase a property.</p> <p>If a property is divided by major infrastructure, it should be able to be subdivided.</p> <p>Existing legal Multiple Occupancy should be converted into subdivisions so bank loans can be gained and a wider market for sale be achieved for owners; providing affordable housing.</p>	<p>Dual Occupancy (detached) is proposed for properties equal to or greater than 40 hectares.</p> <p>Secondary Dwellings were proposed for properties equal to or greater than 10 hectares.</p>	<p>For consideration of Council.</p>
<b>Submission 43</b>			
<p>Housing</p>	<p>Supports second detached dwelling on rural land greater than 40 hectares and provides arguments in support; including:</p> <ul style="list-style-type: none"> <li>• secondary income that is independent of market prices;</li> <li>• helps the current housing shortage;</li> <li>• allows families to stay on the land, and</li> <li>• puts minimal stress on the shires infrastructure as rural homes are self-sufficient.</li> </ul>	<p>Acknowledged</p>	<p>For consideration of Council.</p>
<b>Submission 44</b>			
<p>Housing Process</p>	<p>Given the price of land in this area it often requires family pooling money together in order to buy a farm; having to maintain an additional property in town makes it almost impossible to survive.</p> <p>If detached dual occupancy was allowed on rural land it would mean that many farmers could shed some debt and get ahead a little so that farms do not go under.</p> <p>Concerned that any submission will not be listened to.</p>	<p>Acknowledged</p>	<p>For consideration of Council.</p>

<b>Submission 45</b>			
Housing	<p>Detached dual occupancy on smaller acreage would allow aging farmers to stay in their homes and have their families close by to help and care for them.</p> <p>Most farmers have a dread of being confined to small areas when they have had a life on the land.</p> <p>Submission provides further support for detached dual occupancy.</p> <p>Rural worker's dwellings criteria needs to be relaxed so that it is possible for farmers on smaller farms to meet the labour-intensive and 24/7 on farm demands.</p>	Acknowledged	For consideration of Council.
<b>Submission 46</b>			
Multiple Occupancy Process	The proposed Amendment 24 just changes Action No 93 without any explanation. Questions why council has proposed to delete this action.	Acknowledged	For consideration of Council.
<b>Submission 47</b>			
Housing Process	<p>Expressed concern about the consultation process and lack of notification because does not receive the Tweed Link; should have been notified by post.</p> <p>The ability to generate extra income by building a second dwelling for future whether it be for family to live in and help with the farm and hopefully be cared for as they age, or to use to generate some income whether as a rental or a B and B.</p> <p>Have no superannuation and an extra couple of hundred dollars will help to pay some bills.</p> <p>Disagree with the proposed deletions in the policy document as do not believe that due course has been followed.</p> <p>Loves the land and wants it to continue as a farm when they are gone within the family but needs money to do this.</p>	Acknowledged	For consideration of Council.
<b>Submission 48</b>			
Housing Agriculture	<p>Opposes deletion of detached dual occupancy and rural workers dwellings actions.</p> <p>Concerned for farmers who may be forced to leave their properties due to increased production prices, a struggling economy and climate uncertainty.</p>	Dual Occupancy (detached) is proposed for properties equal to or greater than 40 hectares.	For consideration of Council.

<p>Climate change Process</p>	<p>How does a farmer afford to make their property innovative and sustainable if they are struggling to make ends meet?</p> <p>Concerned farmers will be forced to sell their farms in coming years with minimal Council assistance, resulting in the Tweed losing prime farm land.</p> <p>Climate change is predicted to increase the risk of drought, flood, and bush fires in Australia. How are farmers expected to thrive when their crops/livestock are constantly affected by an unpredictable climate? A second detached dwelling on farms &lt;40 ha would support the rural community financially (and mentally) going forward.</p> <p>A second detached dwelling on a farm less than 40 ha could also attract young people back to the Tweed. With young people getting pushed out of the housing market, they could reside near their ageing parents and assist with farming activities. Potentially, this will take the pressure off nursing homes, bring young, innovative ideas to rural areas and reduce outside opportunity to purchase land for non-farming purposes.</p> <p>Rural workers dwellings would give farmers the help they need due to the intensity of farming on smaller properties within the Tweed. It also gives farmers the opportunity to leave their farm for longer periods, knowing farm production can be maintained in their absence.</p> <p>Councillors are appointed to make decisions based on the best interests of a community. If the rural community are unanimously voting against the above amendments.</p>	<p>Secondary Dwellings were proposed for properties equal to or greater than 10 hectares.</p>	
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<b>Submission 49</b>			
Housing	<p>Owns a large property that it is just too big for one person to manage and try and make a living from.</p> <p>Is nearing retirement age and young people think that this sized land is hard work and don't want to try and work it.</p> <p>Now is the time to get people back on the land learning how to look after water and grow food.</p> <p>There are virtually no small (20 acres or less) vacant blocks left in the Tweed.</p> <p>Most people who want a rural lifestyle want 20 acres or less. The rural strategy plan should keep in the action to investigate subdividing blocks smaller than 100 acres in rural areas, benefits would include:</p> <ul style="list-style-type: none"> <li>• More people can become self-sustainable</li> <li>• Blocks will become more affordable</li> <li>• There can be more small-scale intensive farming</li> <li>• There will be more housing available</li> </ul> <p>Proposes to keep in the action plan to investigate a second house and / or rural workers dwelling on rural properties.</p> <p>Concerned about the assumption that no response to consultation reflects satisfaction with the way things are, and did not receive an acknowledgement to feedback or submissions. Proposed a summary document sent to landowners.</p>	<p>Your Say Tweed</p> <p>The RLS has proposed a supply and demand analysis as a first step in determining the need for a more holistic investigation into subdivision of rural land, but at this time has not proposed a reduction in the MLS for the majority of rural land.</p> <p>It is normal process to provide submission authors with an acknowledgement letter or email. The previous stage of the project produced a Policy Directions Paper which provided a concise understanding of the priority areas that the final strategy would sit under. Due to the diversity of issues raised by the community, there are more than 130 actions which reflect the interests and issues raised.</p>	For consideration of Council.
<b>Submission 50</b>			
Housing RU1 MLS	<p>Proposed Amendment 1 (increase the minimum lot size for all RU1 zoned land to 40 hectares): The proposal to limit RU1 zoned land to 40 hectares is restrictive on potential agricultural land uses and limits entry to primary production to large acreage lots that are cost prohibitive to many who would like to pursue rural production.</p> <p>Proposed Amendment 16 (detached dual occupancy dwelling permissible with consent on allotments of at least 40 hectares), and Proposed Amendment 17 (secondary dwelling permissible with consent on allotments of at least 10 hectares): Such a dwelling may provide a wider revenue base than exists under current permissions associated with RU1 and RU2 zoned land. The original action should be retained.</p>	Acknowledged	For consideration of Council.

	<p>Proposed Amendment 18 (removing the requirement to demonstrate that the property is remote or isolated when seeking approval to build a rural workers' dwelling): Rural workers are best accommodated where they work and any requirement that limits the capacity to provide a rural worker's dwelling to only remote or isolated properties should be removed.</p> <p>Proposed Amendment 19 (small detached dual occupancies not larger than the size requirements for secondary dwellings be exempt from development contributions): The costs associated with Council contributions for secondary dwellings on a per bedroom basis are prohibitive for many farmers who need accommodation for family members and workers to support their agricultural activities, and only forms another impediment to rural production in the Tweed Shire. The original action should be retained.</p>		
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**Submission 51**

<p>Housing Process Consultation</p>	<p>Concerned that they have not been contacted individually by letter.</p> <p>In the past the farm has been able to provide a sustainable, profitable income for the family but now with the current economic climate we have had to have alternative income to maintain our properties.</p> <p>Does not support the amendments that have been submitted by the councillors.</p> <p>Item 10 in the RLS should be deleted in its entirety and the current right to subdivide the areas of RU1 into 10 hectare lots should not be taken away and the existing rights of land holders to subdivide should be upheld and extended to lots in the RU2 zones for parcels of less than 40 hectares.</p> <p>Smaller lots have allowed for better environmental management and are more sustainable financially.</p> <p>It is difficult to see how a Secondary Detached Dwelling would be a hindrance to traditional farming, as it would provide a way of having on farm assistance by providing accommodation for family or workers. As a rental dwelling it would also provide a way of creating an extra income for the property that would not be subject to market and weather volatility.</p> <p>Concern that this document is not a stand-alone document, and has the potential to be severely impacted by other Council plans and policies, such as the A19 Biodiversity, Village Strategy etc.</p>	<p>Acknowledged</p> <p>Refer to response to submissions above</p>	<p>For consideration of Council.</p>
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**Submission 52**

<p>Housing RU1 MLS</p>	<p>Does not support the amendments that have been submitted by the councillors; there should be a provision for a Secondary dwelling on all rural zoned lots.</p> <p>Item 10 in the RLS should be deleted in its entirety and the current right to subdivide the areas of RU1 into 10 Hectare lots should not be taken away and the existing rights of land holders to subdivide should be upheld and extended to lots in the RU2 zones for parcels of less than 40 hectares, not eroded by the RLS.</p> <p>Content similar to Submission 63</p>	<p>Acknowledged</p>	<p>For consideration of Council.</p>
<b>Submission 53</b>			
<p>Housing</p>	<p>Content almost identical to Submission 63</p>	<p>Acknowledged</p>	<p>For consideration of Council.</p>
<b>Submission 54</b>			
<p>Housing Consultation General</p>	<p>The strategy needs further consultation with the people it's going to affect from rural communities.</p> <p>Does not agree with the proposed 25 amendments.</p> <p>Provides a history of personal circumstances that may have benefited from additional housing opportunities.</p>	<p>Acknowledged</p>	<p>For consideration of Council.</p>
<b>Submission 55</b>			
<p>Housing</p>	<p>Traditionally, ageing farmers and their partners have been able to stay living on their farms, while younger members of their family build their own dwellings and take over the running of the farm. This needs to continue for the health and wellbeing of elderly farmers and the ongoing working of the land by the younger generation who will also need to live on the land.</p> <p>Need to address the increasing homeless population.</p> <p>If farmers are struggling to make a living off the land, they could have a guaranteed income from a rental dwelling. This may allow them to consistently work on the land without additional, external employment. The extra dwelling could be used as a farm labourer's cottage.</p>	<p>Acknowledged</p>	<p>For consideration of Council.</p>
<b>Submission 56</b>			

<p><b>Housing</b></p>	<p>Supports Tweed Shire Council's recommendations that the current restrictions remain in place for rural zoned properties and not allow more dwellings to be built on properties.</p> <p>It is time to put in place permanent boundaries to protect farms that will only become more important as climate change takes hold.</p> <p>Any increase in population on neighbouring properties will increase the potential for rural land use conflict.</p> <p>Farmers have a right to farm &amp; should not have any further restrictions placed on them by urban encroachment.</p> <p>With the agri-tourism industry we have a wonderful opportunity to utilise all the farms in our shire.</p> <p>There has always been and will always be those few minorities that wish to make a profit from turning farmland into real estate and to let them go ahead with their desires for development.</p> <p>The rules that are in place now have been well thought out with due diligence and foresight and to loosen these restraints would only degrade one of our best assets.</p>	<p>Acknowledged</p>	<p>For consideration of Council.</p>
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**Submission 57**

<p>All deletions Housing Process</p>	<p>Had previously supported it with changes until the recent seemingly rushed deletions.</p>	<p>Acknowledged</p>	<p>For consideration of Council.</p>
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**Submission 58**

<p>All deletions Housing Tourism</p>	<p>Action No 56 (Function Centres). Support the proposed amendment, in part; should be a short term or high priority.</p> <p>Supports Action 58, 62, 64, 68, 80 (but "small scale" needs defining), 87, 88, 89, 91, 92, 93 and 136.</p> <p>Action 63 (RU1 and RU2 zones increased flexibility (request that Implementation Outcome 3 (Potentially incompatible landuses are listed as prohibited in the LEP) be deleted on the basis that until further investigations are completed it is not possible to determine the most desirable approach and therefore is premature.</p> <p>Action 67 (Tourist and visitor accommodation): requests that the RU2 zone be deleted from this proposed action on the basis that All the forms of Tourist and</p>	<p>The RLS is proposing to introduce a new definition for 'rural tourism' under which a range of tourism and visitor accommodation might be possible that is not either defined or possible now. In addition, until such time as detailed guidelines and development controls are developed it is not possible to say whether 'serviced apartments' or a derivative yet to be considered might not be possible and as such it is not recommended that RU2 be removed at this time.</p> <p>While an additional dwelling might be possible in certain circumstances under the original Action 82, subdivision is not possible unless the size of the</p>	<p>For consideration of Council.</p>
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	<p>visitor accommodation proposed to be permissible (in the original draft) are already permissible with consent in the RU2 zone, with the exception of serviced apartments. There are already sufficient opportunities for low-key tourist accommodation in the rural areas.</p> <p>Does not support Action 82 and 83 (detached dual occupancy and secondary dwellings), if the original action proceeds, a further action is necessary to prevent subdivision.</p> <p>Does not support Action 84 (rural workers dwellings): rural workers dwellings should be deleted from the LEP. Too often rural workers' dwelling is a sham and even if originally legitimate, is impossible to police over time. Better to make dual occupancies (detached) and secondary dwellings (detached) permissible, with strong controls on subdivision.</p>	<p>allotment meets existing subdivision requirements. The RLS is not proposing to change these requirements and as such no subdivision could result from the provision of additional dwelling unless it is already possible.</p> <p>The previous version of Action 84 referred to investigating the amendment of the LEP to remove the requirement for a landowner to demonstrate that the property was isolated and therefore a rural workers dwelling was required. The removal of this requirement from the LEP would not automatically result in more dual occupancy (detached) dwellings unless the landowner could meet the other requirements still in the LEP.</p> <p>One of these requirements is that they demonstrate the economic capacity to support the ongoing employment of rural workers.</p> <p>While it is the intention of this action to support legitimate agricultural use of the land, it has the possibility to lead to dual occupancy development on smaller properties.</p>	
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**Submission 59**

<p>All amendments</p> <p>Housing</p> <p>Environment</p> <p>Agriculture</p> <p>Process</p>	<p>Support proposed minor editing changes specified in the proposed amendments 2 – 8, 12 and 25.</p> <p>Opposed to the proposed amendments seeking further investigations in amendments 1, 9, 10, 11, 13, 14 and 15.</p> <p>Strongly opposed to proposed amendments 16 – 24, seeking to delete Items 82 to 84 and Items 87 to 93 in Policy Direction 5.</p> <p>In its entirety, the document adopts the concept of protecting the environment by mitigating the pressures on it, as required by the North Coast Regional Conservation Plan 2010. It also addresses the imperative need to actively manage the competing land uses of the Tweed.</p> <p>Deleting such a large section of policy Direction 5 simplistically attempts to remove rather than manage one of the competing land uses, and removes associated safeguards and offsets in the process. Ignoring a reality is not mitigating it. It could well have a detrimental effect on the environment.</p>	<p>Acknowledged</p>	<p>For consideration of Council.</p>
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	<p>The submission provides a detailed response which addresses the impact of the proposed deletions on the intent of State Acts, Plans, Strategies and Ministerial Directions, Issues arising, and implications.</p> <p>State Environmental Planning Policy (Rural Lands) 2008 (Appendix 3 RLS 2018) stresses the need to avoid too much further subdivision of rural land. Federal and State initiatives for aging in place were also considered, and management of competing issues became establishment of a precarious balance. The RLS in its essentially unadulterated form goes a long way towards establishing this balance.</p> <p>RLS 2018, Policy Direction 5 in particular, recognises and addresses the associated issues. It is integrated throughout the document as a major contributor to the total economy of the region as a whole, as well as to the impacts on lifestyle, welfare and income. The items proposed for deletion largely reflect community input through the various formats used by council to collate the people's wishes.</p> <p>All of the items proposed for deletion relate to housing diversity on land zoned RU1 and RU2. They have extensive built-in safeguards and offsets to avoid over development or inappropriate development, as detailed in many of the Appendices and as stipulated by the various associated State generated documents.</p> <p>Modern day farming techniques often involve more intensive practices than was the case previously, and smaller scale farming in a region such as this is likely to become increasingly the norm. This increases the importance of diversification.</p> <p>Workers' cottages Item 84 – today's economic climate means that people often need to travel longer distances from their home base for work than in some previous times, and farm work usually involves very early starts.</p> <p>Item 87 – may need to be altered rather than deleted. Investigation into the need for development contributions for such development would be more appropriate.</p> <p>Why ignore a supply and demand analysis for any sizeable development? (Items 88 and 89)</p> <p>Items 91 to 93 give more common sense, flexibility and clarity to both resident and council in regard to dwelling entitlements.</p> <p>These items were developed by professionally qualified and experienced council staff in response to extensive and democratic community input. They tend to give clarity and more certainty to what landowners can do with their</p>		
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	<p>land, and to what council can allow in rural development. They are enabling rather than disabling.</p> <p>The Final Draft of the Rural Land Policy has undergone laborious compilation and meticulous analysis and revision over more than 5 years. It is to some extent a community generated document.</p> <p>The proposed deletions should not occur. The document including those items had as its major consideration a balance between all these factors, and needed only the minor adjustments and editing proposed in some of the other items.</p>		
<b>Submission 60</b>			
<p>Housing Consultation Subdivision Agriculture</p>	<p>The Tweed is so short of rural accommodation and an extra dwelling is hopefully a way to house a family member who will help on the property and provide aged care.</p> <p>Sees no extra imposition on Council resources as are self-sufficient with own water and septic systems.</p> <p>Preferred option would be to subdivide a small parcel of land but this does not seem to be in Council plans for the future, so a second dwelling entitlement would be an improvement.</p> <p>At this stage farming is not viable without a way of supplementing income without going off farm and are now too old for this option; allowing subdivision of smaller lots with restrictions could make a huge difference to farming with more boutique style farming.</p> <p>Landholders should have been notified by mail (post).</p> <p>There has not been enough community consultation or participation in the matter. Some of the ideas in the strategy sound quite reasonable but not enough time has been spent with the people who are affected the most.</p>	Acknowledged	For consideration of Council.
<b>Submission 61</b>			
Housing	<p>Always rented houses on rural land. It is increasingly difficult to find suitable places to rent as there are not enough of them which is causing an escalation in rents. By allowing a second or even third detached dwelling on rural land greater than 40ha would allow people like me to live in a rural environment.</p> <p>Is looking to purchase rural land in this area; if what TSC is proposing to implement is approved, this may not be possible considered building additional dwellings for</p>	Acknowledged	For consideration of Council.

	elderly parents to live in or the possibility of building a dwelling for rental purposes for additional income to help pay a mortgage.		
<b>Submission 62</b>			
Housing	<p>Object to the proposed amendments to the Rural Land Strategy concerning detached dual occupancy dwellings especially on properties over 40 hectares.</p> <p>Concerned with the potential legal exposure &amp; potential legal costs due to taking away landholders existing rights</p> <p>Questions why Tweed Shire Council is so out of step with other councils.</p> <p>These amendments will make it harder for families to keep the farm due to limiting earning potential from the farm from rental income for additional housing on the property, especially in hard times, and make it harder for families to live together &amp; support each other. Increase fuel usage due to farm workers having to drive from rental properties to farm instead of being able to reside on the farm. It would also result in older farmers having to enter aged care earlier, and could have the indirect effect of the amendments would be to increase the foreign ownership of farmland in the Shire.</p>	Dual Occupancy (detached) and Secondary Dwellings as detached dwellings are currently prohibited and therefore deletion of those actions relating to additional housing cannot be seen as removal of an existing right, as no right currently exists in the LEP.	For consideration of Council.
<b>Submission 63</b>			
housing	<p>Lismore allows second dwellings and Tweed should follow other councils in the area.</p> <p>List benefits of additional housing previously raised in submissions above.</p>	Acknowledged	For consideration of Council.
<b>Submission 64</b>			
General Process Housing	<p>Considers the original draft strategy is well-researched, evidence backed strategy that provides a logical basis for the approach in it. The Re-exhibition draft strategy does not fit the stated vision of how that vision is to be achieved, as set out in Part 1.</p> <p>There does not appear to be any evidence based reason for the changes.</p> <p>The original draft strategy provides the best, and an appropriate, rural land strategy for the Tweed, for the reasons given in it, and supports its adoption.</p>	Acknowledged	For consideration of Council.
<b>Submission 65</b>			

Flexibility Economics	Supports Actions 63 and 64 to achieve greater diversity of land uses in RU1 and RU2 zones. Supports Actions 43, 44, 76, 77. Commends Council for at last presenting this document but I find it frustrating to read phrases like “ further investigations” and changing “ amend” to “investigate amending”.	Acknowledged	For consideration of Council.
<b>Submission 66</b>			
All amendments Housing Process	Disagrees with the proposed 25 amendments. Has great plans for the property, and the Draft Rural Land Strategy in its original format would have helped. Rural landholders do not want to live near lots of other people, that’s why they take on the burden of owning land; just want options and the Rural Land Strategy should be the document to give those options. The deletions are just struck through and removed in their entirety. It appears to be very contradictory to the Statement of the Mayor on page 5 of the RLS: “We have established a vision for our rural Tweed that will see greater opportunity and long-term economic sustainability for rural business enterprise combined with rural housing opportunities”. What is the reasoning behind changing ‘amend’ to ‘investigate amending’ and ‘prepare’ to ‘investigate preparing’? Queries what Action No. 25 – Landscape Heritage Protection means.	Rural Tweed is valued for many things, one of which is its diversity of landscapes; the landscape heritage protection action was included to acknowledge that within rural areas, the landscape has significance for a range of reasons which should be captured in part through the development of Desired Future Character Statements (see Action 20) and through the history of localities bringing into the story of rural Tweed the history and heritage values of the landscape. Together, Actions 20 and 25 allow identification of those key features of the landscape and their protection for future generations.	For consideration of Council.
<b>Submission 67</b>			
General Housing Process	Disagrees with amendments to actions 63, 80, 68, 77, 82, 83, 84, 87, 88, 89, 91, and 92. Doesn’t believe Council met its obligations in respect of notifying the rural landholders about the draft RLS; unless subscribed to Media Release Subscription Service would never have received these emails. A letter in the post, or a direct mail out through the local Post Office would have been sufficient. Concerned that the RLS is intertwined with other Strategies.	Acknowledged	For consideration of Council.

	<p>Wants dual occupancy (detached) to be allowed so can rent out a house and a few acres of land to someone who has horses and would like to live in the Tweed as there are very few small acreage rental options in the area.</p> <p>This will help financially to restore the property to its former glory, to fix fences, stay on top of weeds, riparian works on the creek line, plant native trees and encourage wildlife on my property.</p>		
<b>Submission 68</b>			
Process	After years of consultation this has overthrown everything. Why bother?	Acknowledged	For consideration of Council.
<b>Submission 69</b>			
Housing Consultation Housing	<p>There were some things I disagreed with in the previous draft of the RLS however the vast majority of it was very good.</p> <p>A key next step for the RLS is to recalibrate with landowners to better appreciate the actions necessary to generate further investment, support diversification and create a more productive rural landscape.</p> <p>Detached dual occupancy should be allowed. Provides argument to support this position.</p> <p>Relaxation of the rural workers dwelling criteria would be of benefit.</p> <p>The increase from 10ha to 40ha in the RU1 should not be pursued.</p> <p>Not enough consultation has been done with the rural land holders themselves. I have spoken to many farmers who had no idea this document existed, let alone have time to read it. Proposes targeted and meaningful community consultation as opposed to the blanket approach which has not enabled balanced outcomes to be generated to-date.</p>	With respect to the proposed increase in MLS for RU1 zoned land please refer to Submission 13.	For consideration of Council.
<b>Submission 70</b>			
Housing	Any issues that may arise from detached dual occupancy can be easily resolved as all of our neighbouring shires seem to manage and thrive with this in place. I would like to see detached dual occupancy allowed on rural land as it provides the means for children to help look after the workload of their aging parents (which the original RLS seemed to take into consideration) however this new amended version appears to have taken many of the great things in the original out.	Acknowledged	For consideration of Council.

	<p>There needs to be a review and some changes to the rural workers dwellings criteria so that farmers who cannot manage the workload and do not have family support can get some help on their property.</p> <p>There are many great things in the RLS however, removing the possibility for Detached dwellings is a mistake that I believe needs to be rectified.</p>		
<b>Submission 71</b>			
<p>Housing Agriculture RU1 MLS Subdivision</p>	<p>Population increases in rural areas would benefit these communities by increased support to local businesses, schools, sport clubs, bus companies, clubs, restaurants, etc.</p> <p>Reiterates the comments of CTRIA, that:</p> <ul style="list-style-type: none"> <li>• Farming in the Tweed has limited potential;</li> <li>• Rural land owners with non-viable rural holdings should have the right to apply to sub-divide;</li> <li>• As the land owners age and farms loose viability, a second dwelling would assist family members to retain Quality of Life;</li> <li>• Secondary dwellings would also go a long way providing additional affordable accommodation with no water, sewerage etc costs.</li> <li>• it should be the right of the rural land owner living on non -viable rural properties to subdivide their investment subject to reasonable and professional Council Regulation.</li> <li>• Tweed Shire rural land is simply an area with tremendous benefits to the land owner and the region when it is sub-divided for rural development.</li> <li>• Any suggestion large areas of the Tweed Rural Land could be developed for competitive, prime farming is nothing but an ignorant statement by vested interests.</li> <li>• Most rural land owners have no superannuation relying on the option to subdivide and sell section of their land to fund their retirement. This can no longer happen if this strategy takes away that option.</li> <li>• Proposed Amendment 1 No. 10-Sought to increase the minimum lot size for all RU1 zoned land to 40 hectares from 10 hectares; this should be deleted.</li> </ul>	<p>With respect to the proposed increase in MLS for RU1 zoned land please refer to Submission 14.</p> <p>Refer to the response to CTRIA in Submission 88.</p> <p>Subdivision of rural land into allotments less than the MLS has not been an option well before the RLS was developed. The RLS proposes to retain the existing MLS for the majority of rural land.</p>	<p>For consideration of Council.</p>
<b>Submission 72</b>			
<p>General comment</p>	<p>Should have more options how we can use our land to support farming income - which is quite low and very seasonal.</p>	<p>Acknowledged</p>	<p>For consideration of Council.</p>

Economic			
<b>Submission 73</b>			
Housing	<p>Deleting many important amendments is to the detriment of future generations, in particular, the deletion of being able to have a second dwelling on rural properties.</p> <p>Provides argument for the benefits of a small second dwelling consistent with other submissions.</p>	Acknowledged	For consideration of Council.
<b>Submission 74</b>			
Housing Process	<p>In its current form without proposed amendments the document is the culmination of several years of investigation, collaboration and planning by the community, council, consultants and state reps; while it doesn't fit everyone's idea of the Tweed for the future it's what has been worked for.</p> <p>Believe the amended document no longer represents its original scope or the community as it is tainted by the views of a few.</p> <p>Concerned that the amendments will establish a framework which will define land banks for foreign and national investment in the future, who have the luxury of time to sit on their investment and watch it appreciate in value, only to be developed by the highest bidder in the generations to come.</p> <p>Would like to see those with best intentions work with farmers and actually ask what they'd like to see done to help conserve, manage, protect the environment they live in.</p>	Acknowledged	For consideration of Council.
<b>Submission 75</b>			
Housing	Identical content to Submission 84	Refer to comments to Submission 84	For consideration of Council.
<b>Submission 76</b>			
Housing	Identical content to Submission 84	Refer to comments to Submission 84	For consideration of Council.
<b>Submission 77</b>			

<p>Housing Subdivision Tourism</p>	<p>Disagree with all the proposed amendments.</p> <p>Are aging landowners who, with their children, want to stay on the farm; proposes:</p> <ul style="list-style-type: none"> <li>• Provision of an economic pathway for approval of secondary detached dwellings on all existing and future rural zoned lots.</li> <li>• Current rights of land holders to subdivide must be upheld and not be eroded by the RLS and extended further by merit based economic mechanism to enable rural land holders to subdivide smaller portions of land with housing entitlements.</li> <li>• recognise the unique financial limitations of traditional farming in the Tweed compared to the majority of NSW farms and support its farmers by advocating and demonstrating that current state-wide blanket policy adopted by Department of Primary Industries regarding rural land fragmentation is not an impost but an asset to Tweed farming operations.</li> <li>• Need to have opportunity to have more than one income from our properties for example small tourist operations like café/ restaurant, wedding or a conference venue.</li> </ul>	<p>Acknowledged</p> <p>Subdivision of rural land into allotments less than the MLS has not been an option well before the RLS was developed. The RLS proposes to retain the existing MLS for the majority of rural land.</p>	<p>For consideration of Council.</p>
<b>Submission 78</b>			
<p>Housing Subdivision</p>	<p>The RLS should make Provision for an economic pathway for approval of Secondary Detached Dwellings (SDD) on all existing and future rural zoned lots, 10 or 40 hectares.</p> <p>The existing rights of land holders to subdivide must be upheld and not be eroded by the RLS.</p> <p>A merit based economic mechanism to enable rural land holders to subdivide smaller portions of land with housing entitlements.</p> <p>Provided detailed argument in support of these positions.</p>	<p>Acknowledged</p>	<p>For consideration of Council.</p>
<b>Submission 79</b>			
<p>Housing Consultation Process</p>	<p>Many farmers are indicating they know nothing about the RLS and, consequently, have had no input into a document that determines their future.</p> <p>Council has not got the message out appropriately to the key stakeholder group. Many farmers and rural landowners would prefer mail.</p>	<p>Acknowledged</p>	<p>For consideration of Council.</p>

	<p>Concerned that due process been effectively, fairly, openly and respectfully carried out.</p> <p>Farmers should be allowed the option to have secondary detached dwellings on their land as in other LGA's</p> <p>In the eventuality that farmers have the option to place another dwelling on a property, it does not necessarily follow that every landholder can afford to or wants to build another house on their property.</p> <p>Every rural industry in the Tweed is struggling to survive; refers to the ABARE Report for Richmond-Tweed.</p> <p>Many farmers have an off farm job or alternate income sources. In many cases, both partners are working off farm to survive.</p> <p>Council should also be assisting farmers by facilitating rural workers dwellings where appropriate.</p> <p>Any Strategy should allow for an individual farmer or landholder's circumstances to be properly and fairly considered, not a blanket policy.</p> <p>Many believe that this process has been flawed and may be subject to review, either legally or by the responsible State Government Departments.</p> <p>The main reason for the lack of response has been farmers and rural landholders have been unaware due to Council's method of communication.</p> <p>Those present at the 2 "Community Conversations" (possibly totalling 80 people) and the Public Forum with estimates from 100 - 130 people present) showed their disapproval of the proposed RLS with the current amendments.</p>		
<b>Submission 80</b>			
General Housing	<p>Supports the Original Draft Strategy which was well-researched, evidence backed strategy that provides a logical basis for the approach in it.</p> <p>It recognises that some rural land, of less than 40 ha, may be appropriate for a second dwelling, upon appropriate investigation.</p> <p>The Re-Exhibited Draft Strategy does not fit the stated vision or how that vision is to be achieved, as set out in Part 1. There does not appear to be any evidence based reason for the changes proposed in it.</p>	Acknowledged	For consideration of Council.
<b>Submission 81</b>			

Housing	<p>Supports detached dual occupancy on 10 hectares or more.</p> <p>Allowing for these changes would encourage farming for future generations and continued investment into local agriculture. Detached dual occupancy on 10 hectares or more will help in the utilisation of the Tweed's valuable farm land and natural resources, and make it economically viable for the community.</p>	The RLS is proposing that dual Occupancy (detached) be made permissible with consent on properties not less than 40 hectares.	
<b>Submission 82</b>			
Housing Consultation	<p>The Rural Land Strategy as it currently stands does not fully support the rural landholders and farmers in achieving the visions for the future Rural Tweed Shire.</p> <p>As many rural landowners and farmers are completely unaware of this proposed Strategy, nor had any input into this document, it does not fully represent the wishes, views or requirements of the rural community.</p> <p>Proposes that:</p> <ul style="list-style-type: none"> <li>• detached dual occupancy should be allowed;</li> <li>• Rural workers dwellings should be allowed;</li> <li>• Land that already has a 10 ha MLS should be retained, and</li> <li>• Improved rural community communication and consultation is needed.</li> </ul>	Acknowledged	For consideration of Council.
<b>Submission 83</b>			
MOs Process	<p>Urges Council to keep Action 93 in the Draft Strategy and commit to investigating and developing options for MOs and community title in the Tweed.</p> <p>There needs to be a clear and effective mechanism or instrument for establishing individual freehold title from an MO arrangement, and that it will be considerably easier for the matter to be resolved by this generation rather than the next.</p> <p>Omitting this from the Draft Strategy and leaving it as a problem to be dealt with in 20 years' time will just exacerbate the issues already causing stress for stakeholders in your shire.</p> <p>Keeping Action 93 in the Strategy would not lock you into a mechanism, but rather keep the door open for further discussion about the best way to balance stakeholders' interests, community concerns, environmental impacts and other matters.</p>	Acknowledged	For consideration of Council.

	It is disappointing that the efforts of locals such as our parents in consulting with Council about these amendments can so readily be disregarded without a more fulsome explanation as to the reasons why.		
<b>Submission 84</b>			
General Process Agriculture Consultation Subdivision	<p>The RLS is striving to keep our unique corner of the globe to its rural heritage, but concerned that strict impartiality of a lot of the implementation items of the RLS will have the opposite effect and could cause greater loss to our rural heritage due to non-viability.</p> <p>The RLS does not consider the unique variance of rural land, its uses, management and viability that this shire has.</p> <p>The RLS will be outdated before it even has a chance to be implemented.</p> <p>Does not believe using figures for the Northern Rivers is a sound foundation for constructing this strategy.</p> <p>The RLS appears to be based on the traditional practices of the rural sector of the Tweed but does not take into consideration the future practices or even current world practices for horticulture.</p> <p>Not investigating the chance to consider a more amenable minimum lot size process in RU2 properties, Increasing some RU1 MLS and not permitting secondary dwellings will have a detrimental effect on the ability for this shire to farm its way into a technological future.</p> <p>The flawed community consultation process for this document has raised concerns across the whole shire.</p> <p>Policy Direction 2 Protect and improve environmental values and respond to natural hazards; the entire section needs to go back to the drawing board and go through more community consultation.</p>	<p>Regarding comments relating to rural heritage, refer to Submissions 7 and 66.</p> <p>The RLS has proposed a range of initiative which seek to firstly identify those features of rural Tweed which give localities their unique identity, and proposed that Desired Future character Statements be prepared to allow assessment of development proposals to consider how to protect and enhance those features valued throughout rural Tweed.</p> <p>Through the more than 130 actions proposed in the Implementation Plan, the RLS seeks to support innovation, diversification and value-adding. The introduction identifies the great diversity which is now reflected in the produce grown in rural Tweed and the diverse backgrounds of rural residents.</p> <p>The lot sizes of rural allotments has been extensively reviewed, and given the extensive subdivision of rural land into allotments substantially less than the MLS and other considerations the RLS is not proposing to further subdivide the majority of rural Tweed.</p> <p>Policy Direction 2 regarding environmental protection is in effect an adjunct to the comprehensive Biodiversity DCP and the vegetation management strategy currently being updated by Council.</p>	For consideration of Council.
<b>Submission 85</b>			
Consultation	<p>Request a review of Council's engagement procedures to facilitate an improved approach to involving the rural community in the decision making process.</p> <p>All documents exhibited to the public (and available from the Document library and supporting information on the TSC website) add up to a massive volume of complex information to absorb and understand.</p>	Acknowledged	For consideration of Council.

	<p>The TSC should be held to account to follow the same consultation requirements its rate payers are required to lodge a DA, which stipulates the requirement of:</p> <ol style="list-style-type: none"> <li>1) Notice in Tweed Link</li> <li>2) Notice on Council Website</li> <li>3) Letters to neighbouring (for RLS affected) properties</li> <li>4) Site Notice</li> </ol> <p>Submission received during notification are taken into account by Council before determining the DA.</p> <p>All efforts must be made to involve stakeholders (not just via digital channels) to ensure a fair and transparent democratic process.</p>		
<b>Submission 86</b>			
<p>General Housing Subdivision Agriculture</p>	<p>Proposes the stance of CTRIA as being:</p> <ul style="list-style-type: none"> <li>• Provision of an economic pathway for approval of secondary detached dwellings on all existing and future rural zoned lots.</li> <li>• The current rights of land holders to subdivide must be upheld and not be eroded by the RLS and extended further by</li> <li>• A merit based economic mechanism to enable rural land holders to subdivide smaller portions of land with housing entitlements.</li> <li>• recognise the unique financial limitations of traditional farming in the Tweed.</li> <li>• make Provision for an economic pathway for approval of Secondary Detached Dwellings (SDD) on all existing and future rural zoned lots.</li> </ul>	Refer to Submission 88	For consideration of Council.
<b>Submission 87</b>			
General	Same content as Submission 99	Refer to Submission 88	For consideration of Council.
<b>Submission 88</b>			
Housing Process	<p>The 25 annulments you want to make should go back in the rural land strategy.</p> <p>The assertion that people who didn't respond to the original proposals must agree is simplistic and erroneous.</p>	Acknowledged	For consideration of Council.

	<p>Farmers cannot afford to buy rural properties and the only chance of keeping a property viable and productive is to leave farmers on them. This means council needs is to allow for a second dwelling to:</p> <ul style="list-style-type: none"> <li>• provide a second income stream from rental or</li> <li>• provide accommodation for family members to help out (they can't afford rent/mortgage and to run the property) or</li> <li>• provide accommodation for rural workers.</li> </ul> <p>The policies hanging off the Rural Land Policy are of great concern. Council failed to inform land holders of changes to their land (wildlife corridor, Aboriginal importance etc) is unconscionable conduct.</p>	With respect to wildlife corridors and Aboriginal importance, refer to the response to the CTRIA Submission 88.	
<b>Submission 89</b>			
Agriculture Housing Environment	<p>Concerned to fix to fix our environment through eco-friendly farming practices.</p> <p>Any RLS put forward by Council shouldn't remove second building entitlements. Doing so removes the economic and environmental viability of farms and communities in all of the Tweed shire.</p>	Acknowledged	For consideration of Council.
<b>Submission 90</b>			
General Housing Process Consultation	<p>The Draft Rural Strategy was developed over many years in consultation with the public, various bodies and experts. It was surprising to see the significant changes made by Councillors.</p> <p>Secondary dwellings that could provide important income to farmers to allow them to stay on the land, housing for farm workers or for family members have been dismissed and appear to be considered by Councillors as a greater impact to that of functions centres / restaurants which come with significant land use conflict as outlined by the DPI and require strict management to operate successfully. These uses would require thorough investigation and consultation and if adopted need a similar approach to that of Byron Shire Council.</p>	Acknowledged	For consideration of Council.
<b>Submission 91</b>			
Process Consultation Housing Agriculture	<p>Critical of the process in development of the RLS and the Community Conversation content.</p> <p>The Public meetings were not widely advertised. There was no letter box drop with a clear statement of what was to be discussed. There was no radio advertising. There was no bill board or road side signage.</p>	Acknowledged	For consideration of Council.

	<p>Major banks are unlikely to lend money to anybody from rural land who don't have a regular income which may come from a second dwelling.</p> <p>The main group of young farmers wanting to move to rural properties are offspring of people who own rural land, who need a second dwelling on the property to make their move a viable proposition. Many smaller villages and communities will benefit from increased younger populations.</p> <p>Additional dwellings can be accommodated with reasonable design and suitable landscaping.</p> <p>Not all land was productive and this non-productive land could be used for housing without affecting rural production.</p>		
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**Submission 92**

<p>Document design</p> <p>Tourism</p> <p>Subdivision</p> <p>Economics</p> <p>Consultation</p> <p>Process</p>	<p>Raises concern about how the document is written and the content. The language used and layout makes it difficult for the community to understand.</p> <p>Farmers need to understand what the RLS means to them and how to use it and what options are available to them.</p> <p>Needs a better link to the Tweed Destination Management Plan as agri-tourism and nature-based tourism are critical components.</p> <p>The term 'rural tourism' is too broad and should be aligned with agricultural (agri-tourism) or natural environment (nature-based tourism). Confusion regarding information around secondary dwelling and rural workers accommodation.</p> <p>Does not want further fragmentation or subdivision of rural land.</p> <p>Many are looking for options to bring other family members onto the farm for succession planning or to co-farm with younger farmers.</p> <p>Believes that innovative and flexible strategies can be included in this document to address additional farm accommodation.</p> <p>The RLS needs to demonstrate how it sits within the context of other relevant plans and strategies.</p> <p>The RLS is unnecessarily complicated in its structure and language. Simplifying and consolidating the strategies and actions needs to be considered.</p> <p>The process of consultation has been influenced by other agendas. Many farmers were unaware of the document.</p>	<p>The RLS has been prepared using a plain English format that avoids use of technical terms where possible. The Implementation Plan provides a plain English explanation under the heading 'Implementation Outcomes' which is presented to assist the reader understand the proposed action. An example of where plain English is not used would assist in interpreting this comment.</p> <p>The Destination Management Plan is one of many documents that may play a role in the use of rural land.</p> <p>Destination Tweed has had opportunity to review and respond to the content of the rural Tourism section of the document prior to preparation of the RLS, and provided positive feedback on the range of actions presented.</p> <p>The creation of a new definition for rural tourism, to be inserted into the LEP, will require detailed consideration and should be a term which is broad enough to encapsulate the diversity of potential landuses likely and not focus solely on one aspect of rural land use.</p> <p>The RLS is not proposing subdivision of the majority of rural land.</p>	<p>For consideration of Council.</p>
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	<p>Recommends withdrawal of the document and redeveloped and represented after a more independently facilitated process.</p> <p>Exhibition process should also offer information events that provide opportunity for structured and specific feedback.</p> <p>Process of review by an independent facilitator with broad cross section of the stakeholders.</p> <p>The revised RFS needs to consider the audience and should include its purpose - why the rural land strategy is needed; what the future looks like - a vision for agri future of the Tweed and values that underpin the strategy; how the strategy will be implemented and how it interacts or relates to other relevant documents and strategies; what opportunities are presented for the current community with a focus on succession options and transition from traditional agriculture to one that supports innovation, value-adding and diversification in agriculture.</p>	<p>Innovation, diversification and value-adding are key themes of the RLS (as identified in earlier stages of the project), with more than 130 actions designed to provide opportunities upon which landowners can pursue alternatives to their current farming practices.</p> <p>Appendix 2 provides a clear and succinct explanation of how the RLS sits within the planning framework including local policies, plans and strategies.</p> <p>The RLS has been structured to allow a succinct plain English explanation of essential information (Part 1) and then goes straight into the Implementation Plan (Part 2), enabling readers the ability to get to the core of the document without the need to wade through the often lengthy explanations and background typically presented at the front of the document.</p> <p>This has allowed the RLS Part 1 to be condensed to less than 10 pages, including diagrams.</p> <p>Part 2 provides direct access to the actions proposed under each of the nine policy directions endorsed by Council, which makes it possible for the reader to access actions relevant to their interests without having to go through all actions; for example, agriculture-related actions can be found under Policy Direction 1, and Housing-related initiatives, under policy Direction 5.</p> <p>Should the reader wish to know more about the history of the document, community consultation, and analysis of properties and allotments, and a diverse range of other important and related material, then the Appendices in Part 3 can be viewed.</p> <p>Mapping which sits at the end of the document in Part 4 is bulky in size, but necessary as it provides the technical basis and spatial considerations relevant to local decisions and will be utilised in the future.</p>	
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		<p>The structure of the document seeks to provide a succinct summary, then get to information of relevance to the largest audience and provide more details later should the reader wish to read further into the creation of the document.</p> <p>The Terms of Reference for the creation of the RLS were derived with a clear agenda; to provide a very open and transparent process for the acquisition of information, consultation and development of linked actions.</p> <p>While it would be desirable to have all landowners both aware and respond to all documents that are placed on public exhibition, this is not the reality for a range of reasons, many of which are spelt out in submissions to this stage of the project.</p> <p>Notwithstanding this, consultation with the RLS has been undertaken utilising a diverse range of approaches which are discussed in Appendix 6 and 7.</p> <p>The RLS has in total, been developed over a period of more than 6 years, has been on public exhibition for more than 310 days; events have been conducted throughout rural Tweed at more than 35 venues, more than 16 Council reports have been prepared, numerous Council workshops held, feedback has been sought from some 20 government agencies, more than 15,000 views of the Facebook videos created in Stage 4.</p> <p>A meeting was conducted with the CTRIA members who note that they represent rural landowners, and who is also a member of the Reference Panel, a group who provided technical input into draft documents prior to public exhibition and are in a position to advise those they either represent or interact with of the status of the draft strategy.</p> <p>A briefing on the RLS was presented to attendees of a combined business event convened by Regionality for start-up businesses.</p>	
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		<p>Page 11 in Part 1 of the Strategy has dedicated the full page to one paragraph which defines the Vision for rural land in the Tweed and is the result of exhaustive review of submissions and defines succinctly what the RLS seeks to achieve.</p> <p>The RLS is a strategic level document, which is not intended to provide detail about how each action will be implemented, this will be the focus of the next stage for the project when an implementation plan will be prepared and presented to Council for endorsement. This is discussed on page 90 at the end of Part 2 Implementation Plan.</p> <p>Notwithstanding this, the Implantation Plan has provided guidance on potential priorities which have been the subject of several amendments proposed by Councillors.</p> <p>Eco-tourism is already a definition in Tweed LEP 2014.</p>	
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### Government Agency and Organisation submissions

#### Submission 93 - Destination Tweed

Numerous	Core content almost same as Submission 92.	Refer to response to submission 92.	For consideration of Council.
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#### Submission 94 – North Coast Local Land Services (NCLLS)

Numerous Environment Agriculture Climate change Housing	<p>Action 3 - Buffers – Map: Would be please to provide advice on natural resource management and sustainable agricultural elements relevant to a trigger map.</p> <p>Action 6 - Zoning – RU6: Would be please to provide advice on natural resource management and sustainable agricultural elements relevant to a transition zones.</p> <p>Action 14 - Best practice guidelines: NCLLS role is to engage with industry and land managers and provide advice on best practice sustainable agriculture.</p>	<p>An additional action which proposes to work with other public land managers to deliver a tenure neutral, coordinated pest management approach that meets General Biosecurity Duty obligations</p> <p>Council welcomes the opportunities that the RLS will provide to work together on implementation of actions listed in this submission and other matters</p>	It is recommended that a joint approach with NCLLS be developed to address pest animals as raised in this submission.
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Sustainability	<p>North Coast LLS would be pleased to assist Council to identify and/or develop best practice guidelines for agricultural practices that could be linked to from Council's website.</p> <p>Action 21: Biodiversity &amp; Habitat Management: Supports the implementation of A19 Biodiversity and Habitat Management.</p> <p>New Action: Pest animals: The Strategy is silent on the issue of pest animals in the Rural Land Space. NCLLS therefore proposes a new action to work with other public land managers to deliver a tenure neutral, coordinated pest management approach that meets General Biosecurity Duty obligations. Key responsibilities: Private land holders/Public Land managers/ Council/ NPWS/LLS. NCLLS looks forward to helping Council to understand how they meet their General Biosecurity Duty obligations.</p> <p>Action 22 - Regional conservation strategies: NCLLS supports Council's decision to develop assessment guidelines that will ensure regional conservation strategies are considered in decisions about development proposals. North Coast LLS proposes adding the Regional Strategic Weed Management Plan and Regional Strategic Pest Animal Management Plan to the list.</p> <p>Action 23 - Catchment health indicators: NCLLS would be pleased to provide advice on natural resource management and sustainable agricultural indicators.</p> <p>Action 24 - Monitoring of catchment management practices: NCLLS would be pleased to contribute to a bi-annual audit of land use and land-management practices.</p> <p>Action 40 - Education – environmental: NCLLS's role is to engage with industry and land managers and provide advice on best practice sustainable agriculture. North Coast LLS would be pleased to work with State Agencies and Council to enhance sustainability across the region. North Coast LLS has a particular focus on the Beef, Blueberry and Macadamia industries and regularly hosts workshops with farmer groups to educate about best practice management techniques for sustainability and would be pleased to discuss other opportunities for educating farmers in the Tweed Council area.</p> <p>Action 41 - Vegetation corridors – planning proposals: NCLLS is pleased to provide advice that supports Council's assessment and rezoning for development proposals.</p> <p>Action 43 - Priority weed control: NCLLS looks forward to helping Council to understand the role of the agency in facilitating and coordinating the Regional</p>	that may become relevant once this stage of the project commences.	
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<p>Strategic Weed Management Plan and how Council can meet its General Biosecurity Duty obligations.</p> <p>Action 44: Non-priority weed management: NCLLS looks forward to helping Council to understand the role of the agency in facilitating and coordinating the Regional Strategic Weed Management Plan and how Council can meet its General Biosecurity Duty obligations; and providing information to private land managers that encourages them to manage weeds and meet the GBD obligations.</p> <p>Action 45 - Camphor Laurel: NCLLS supports Council's review of options for the control or eradication of Camphor Laurel.</p> <p>Action 46 - Climate change sustainable land use practices: NCLLS supports the promotion of activity to reduce greenhouse gas emissions and absorbing carbon dioxide.</p> <p>Action 86 - Dwellings – Guidelines: NCLLS would be pleased to provide advice on natural resource management and sustainable agricultural elements relevant to rural housing.</p> <p>Action 121 - Web page: NCLLS would be pleased to assist Council to identify relevant links to information about rural land related matters.</p> <p>Action 126 - Information brochures: NCLLS would be pleased to provide relevant information about agriculture, biodiversity, biosecurity, waterways and emergency management.</p> <p>Action 127 - Emergency preparedness: NCLLS supports Council's action to ensure information on Emergency Services Disaster Management and Response Plan. As a key recovery agency for agriculture and animals in an Emergency situation such as an extreme weather event or biosecurity incident, North Coast LLS would be pleased to provide relevant information.</p> <p>Action 128 - Climate Change preparedness: NCLLS is please to contribute to this action through the provision of information on natural resource management and sustainable agriculture and biosecurity impacts and adaptation options.</p> <p>Action 131 - Best practice information available: NCLLS supports the action to provide information on sustainable land management practices and would be pleased to assist in the delivery of this action. North Coast LLS has existing relevant publications and information. North Coast LLS requests it is added as a delivery partner.</p> <p>Action 133 - Sustainable Land Management implementation: NCLLS supports the action to improve the capacity building of the community to implement</p>		
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	<p>sustainable land management practices. North Coast LLS requests it is added as a delivery partner.</p> <p>Action 134 - Sustainable Living: NCLLS would be pleased to provide advice on natural resource management and sustainable agricultural elements relevant to sustainable living benchmarks.</p>		
<b>Submission 95 - Combined Tweed Rural Industry Association (1)</b>			
<p>General Housing Process</p>	<p>Presented motion passed unanimously by 50 members present:</p> <ol style="list-style-type: none"> <li>1. That all rural landholders must have the right to have a 2nd dwelling on their property as they see fit to help maintain the viability and needs of their property and their personal wellbeing.</li> <li>2. That landholders should make submissions or respond to surveys concerning the RLS recommendations even though there is uncertainty as to whether the council will ignore or treat some responses objectively or fairly.</li> <li>3. That the meeting rejects outright the conduct of the Tweed Shire councillors who have struck down extensive recommendations related to rural landholders having entitlement to dual occupancy and related matters (Policy Direction 5- Greater diversity of Rural Housing).</li> </ol>	<p>Further submission from same author. Refer to Submission 96.</p> <p>Acknowledged</p>	<p>For consideration of Council.</p>
<b>Submission 96 - Combined Tweed Rural Industry Association (2)</b>			
<p>Numerous Housing Agriculture RU1 MLS Subdivision Consultation</p>	<p>At the afternoon session of “community conversations” and at the business chamber forum a show of hands was called for as to who supported the deletion of policy direction 5 and not a hand was raised in support.</p> <p>Most farms in the Shire require an off-farm income to survive and if farming is going to survive in this shire then every opportunity must be provided to allow for extra income not subject to the vagaries of farming. The farming population on the Tweed is rapidly ageing and many farmers will require the assistance of younger family members to assist in the day to day maintenance of the farm so the option of another dwelling on farmland is of importance.</p>	<p>Refer to response to Submission 4.</p> <p>While there were discussions with the Department of Planning and Environment regarding their offer to fund a rural land strategy, the only offer made was one linked to a deliverable timeframe for an unrelated and then ongoing project that was seen to be a priority of the State Government, not of the Council.</p>	<p>For consideration of Council.</p> <p>Changes in the timeframe for implementation of actions as proposed be adopted and further considered in the next stage of the project when a detailed implementation plan is prepared.</p>

<p>Any action that will support farmers to spend more time on the land is to be commended and can only lead to greater productivity. Many farming families develop a very strong attachment to the land and wish to retain that land for future generations, but the reality is that land prices are too high to get an economic return from farming, so for this to happen, the farm has to be virtually “gifted” from one generation to the next, which essentially means the older generation will have to stay living on the farm under the care of the following generation. This is already happening in some instances, as historically, there is a significant number of rural properties having more than 1 dwelling.</p> <p>The preferred position of the CTRIA is to have the 10ha MLS retained, but barring this happening we support that there must be a study into the impacts of changing the 10ha MLS which can justify the change.</p> <p>The DPI has for many years now been telling us that the future of agriculture for the Tweed is small acreage, intensive horticultural crops, developing niche markets and value adding. For the DPI to not support any decrease in the MLS from 40ha is contradictory and fails to address their own recommendations re the future of agriculture.</p> <p>In 2011 the NSW State Govt. gave TSC the sum of \$125,000 to go towards the development of a RLS which was to look at all the current planning controls for rural land. One of these was the 40Ha MLS and its relevance to agriculture in the Tweed Shire.</p> <p>CTRIA, with generations of practical farming experience in the Tweed Shire, have been recommending changes to the inflexible 40ha MLS to allow for the raising of capital, to amalgamate properties, and to reflect the changing face of modern agriculture.</p> <p>The Resource Inventory and Land Capability Assessment produced by the consultants for the RLS has many errors in fact and has used mostly northern rivers production figures to support arguments. How can we have confidence that this document accurately reflects the reality of farming in Tweed Shire?</p> <p>On page 108 of the RLS the statement that “the majority of rural landowners have not provided feedback into the preparation of the strategy. As such, it could be assumed that this lack of response in large part reflects the belief that the way things are now is satisfactory and the future should reflect this attitude”. This is extremely disappointing and reflects council officers misunderstanding of the farming community, their non- involvement in social media and computers in general, the time constraints imposed by having to work 2 jobs and their disillusionment from having previous input ignored.</p>	<p>The value of that offer was also substantially less than the estimate provided to the Department by the Council and the \$125,000 was therefore considered insufficient. Council requested a funding commitment with “no-strings-attached” and of a higher value and this was not accepted by the Department. A funding offer was never formalised by the Department, consequently no funding was received by Council for a rural land strategy.</p> <p>With respect to the 40ha MLS, the following extract is taken from the response to submissions provided after exhibition of the previous version of the RLS.</p> <p>“As explained in Appendix 8 of the draft strategy, the 40 hectare minimum lot size policy was imposed by the NSW Government in 1973, and later included in the Tweed Interim Development Order 2 in 1976.</p> <p>The rationale as explained by the government at that time was to prevent fragmentation of viable rural holdings, ensure consolidation of urban areas, prevent premature subdivision, of land on the fringe of urban areas, and avoid ribbon development along roads linking towns and villages.</p> <p>While the Tweed had adopted 40 hectares as a development standard consistent with the State Government policy.</p> <p>A review of all lot sizes was undertaken which showed that, by 1976 the majority of land in the Tweed had already been subdivided into allotments less than 40 hectares with nearly 90% of allotments less than 40 hectares in the RU1 and RU2 zones, nearly 70% less than 10 hectares, and 60.7% less than 5 hectares.</p> <p>The geographic area of land in the RU2 zone less than 40 hectares represents about 45% of the zone. As Map 5 in the draft strategy shows, properties in the range of 40 - 75.9 hectares are scattered across the zone, with the majority of larger properties over 116 hectares lying to the west of Mount Warning/Wollumbin.</p>	
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	<p>The CTRIA has serious concerns with the impact that the many other strategies and plans will have on the RLS. Reference is made to recent advice from Council regarding a new tractor shed and was advised that the shed could not proceed as it would be impacting the Aboriginal Heritage Strategy.</p> <p>Supports the changing of the time periods for implementation of actions from medium to short term.</p> <p>Questions the deletion of “lifestyle” from action 62 as it is a legitimate use of rural land and the influx of lifestylers has been responsible for significant cultural, intellectual and economic benefits for the Tweed.</p> <p>Questions the changing of several actions from “amend” to “investigate amending” e.g. actions 63, 64. The investigating should have already taken place by the consultants hired to prepare the strategy. How much more money is to be spent? The CTRIA is concerned that these changes may be a stalling tactic.</p> <p>There has been a lot of talk along the lines of “the community wants this” or “the community wants that” so it is opportune to remind TSC that rural landowners are also part of the community and that they will be the most impacted section of the community.</p> <p>The CTRIA believes that there has been insufficient input from rural landowners and that further consultation on the RLS is required.</p>	<p>Appendix 3 in the Draft Rural Land Strategy lists Rural Subdivision Principles which include minimisation of rural land fragmentation and conflict, consideration of the nature of existing agricultural holdings, existing and planned future supply of rural residential land in planning for dwelling opportunities.</p> <p>Any reduction in the MLS would lead to increased dwelling entitlements and unless strategically located would lead to fragmented development which is contrary to the principles in the DPE Settlement Planning Guidelines and the SEPP Primary Production and Rural Development.</p> <p>Figures 27 and 28 in Appendix 9 (page 119) of the RLS shows that the larger the property, the greater the potential for the property to be utilised for agricultural purposes, as reflected in farmland ratings.</p> <p>As reported in the Resource Inventory and Land Capability Assessment prepared in Stage 1 of the project and available for viewing on Council's website, the greatest increase in land values has been associated with small rural holdings attributed in large part due to the capitalisation of the property through construction of a dwelling and other improvements; as such, cutting up the farm is not expected to reduce land values, but make it more difficult for agricultural and environmental land to be protected, and those who seek a genuine rural lifestyle utilising the land to find an opportunity, especially for younger families.</p>	
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		<p>While a reduction in the MLS is not proposed, the draft strategy is proposing that a supply and demand analysis be undertaken to determine if further investigations are required into rural land subdivision perhaps as part of a rural residential strategy. Such an investigation would provide guidance on the strategic merits of further subdivision and locational requirements that may apply if further subdivision was seen as a possibility.”</p> <p>It should be noted that Action 89 proposed a supply and demand analysis to ascertain the need for further subdivision of rural land, but has been proposed to be deleted in its entirety.</p> <p>The RLS is one of a number of strategies, policies or plans which will influence the use of rural land. Reference to a request to construct a farm shed, and advice that the shed could not proceed as it would be impacting the Aboriginal Heritage Strategy is contrary to established Council protocols for responding to pre-lodgement enquiries. Council staff routinely advise that additional information may be required but will not provide verbal advice that a concept cannot proceed based on a general discussion.</p> <p>The Aboriginal Cultural Management Plan has been established to ensure that council fulfils its obligations under existing state legislation regarding Aboriginal cultural heritage which has been in place since 1974. There is nothing new about the legislation, but simply that Council now has a transparent process under which the legislation is complied with.</p> <p>The Resource Inventory and Land Capability Assessment was reviewed by all members of the Reference Panel who included CTRIA, and publically</p>	
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		exhibited; however, if there are errors in fact contained in the document Council welcomes identification of these errors in a separate response.	
<b>Submission 97 - Department of Primary Industries – Agriculture (1)</b>			
All amendments Housing	DPI supports the proposed changes.	Due to the brevity of the DPI response, in comparison with the detailed response to the exhibition of the previous version, and outcomes of the Councillor workshop with DPI and discussions thereafter, the DPI was approached for clarification; which was provided in Submission 98.	For consideration of Council.
<b>Submission 98 – Department of Primary Industries – Agriculture (2)</b>			
Numerous RU1 MLS Housing Economics Subdivision	<p>Proposed amendment to Action 10: supports an increase in the MLS in RU1 from 10 to 40 hectares.</p> <p>Has no concerns with proposed amendment to Actions 46 (Climate change), 47 (Diversification and Value adding), 48 (Priority landuses), 55 (Roadside stalls), and Action 135 (forestry).</p> <p>Action 56 - Function Centres: No concerns with proposed changes to wording. As indicated previously, DPI Agriculture welcomes the opportunity to work with Council to identify provisions that minimise potential impacts to agricultural production from this and similar types of development should the investigation process lead to an LEP amendment.</p> <p>Supports proposed amendments to actions 58 (Food processing hubs), 62 (Destination Management Plan).</p> <p>Supports proposed amendments to actions 63 and 64 (RU1 &amp; RU2 zones increased flexibility), and welcomes the opportunity to support Council in the investigation of appropriate landuses in these zones.</p> <p>Action 68 and 69 (Restaurants &amp; cafes in RU1 zone) supports amendment and is consistent with agreed amendments at DPI/TSC meeting.</p>	<p>This second submission from DPI Agriculture arose from a call to DPI to clarify their position as defined in their submission to the previous version of the RLS and discussions with DPI at the Councillor workshop convened to discuss the issues with them and meeting thereafter.</p> <p>Council welcomes the opportunity to work with DPI during implementation of the RLS.</p>	For consideration of Council.

	<p>Action 77 (Wedding functions): It is important that guidelines and adequate planning provisions are in place given the potential for land use conflict risk. Suggest the retention of 'Prepare'.</p> <p>Action 82 (detached dual occupancy), 83 (Secondary dwellings), 84 (Rural workers dwellings), and 87 Development contributions: DPI maintains the statewide position to protect RU1 and RU2 zones from increased housing density as provided in comments to the previous version of the RLS. The proposed removal of this action is therefore supported. It is also understood that many landowners in the Tweed LGA continue to seek this opportunity for matters such as succession planning and additional income and that such can also have positive impacts on rural communities. DPI Agriculture's position is in consideration of the long term impacts.</p> <p>DPI reiterates that should Council retain this action within the strategy, DPI Agriculture will support Council in developing appropriate planning provisions/guidelines to ensure any potential impacts are minimised.</p> <p>Action 88 (Rural subdivision supply &amp; demand analysis): Supports strategic planning and the need to undertake supply and demand analysis for any rural residential strategy that may be developed.</p> <p>Action 89 (Rural Residential Supply &amp; demand analysis): As per Action 88. The removal of this action sends the message that Council do not wish for further subdivision of the rural area and if this is the intent of the action deletion, this is supported by DPI; however, in the absence of a rural residential strategy adhoc development can occur which can lead to greater risks.</p> <p>Action 91 (Undersized allotments): It is acknowledged from discussions with staff that there may be some instances where a variation of the MLS is possible under the existing LEP and as such it is important that strong criteria/planning provisions are in place to ensure minimal impact to agriculture from any such proposal. Should this action be retained, DPI welcomes the opportunity to work with Council in the development of suitable criteria.</p> <p>Action 92 (Allotments split by infrastructure): Supports the removal of this action as indicated in initial comments on the draft RLS. It is acknowledged from discussion with Council staff that there may be some instances where this is appropriate and should this action be retained DPI welcome the opportunity to work with Council in the development of suitable criteria.</p>		
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	Action 93 (MO and Community title): Should Council consider the conversion of existing multiple occupancies and rural landsharing developments to community title or alternative, it is important that any potential impacts to agricultural production are minimised through the preparation of appropriate guidelines. Provides link to guideline for agricultural considerations with regard to community title developments.		
<b>Submission 99 - Office of Environment and Heritage (OEH)</b>			
Numerous Aboriginal heritage Housing	Supports greater awareness of Aboriginal cultural heritage and proposal to include an additional aim/objective for RU1 and RU2 zones.  No objections to the removal of Actions, 82, 83, 84, 87, 88, 89, 91, 92, and 93.	Acknowledged.	For consideration of Council.
<b>Submission 100 - Geological Survey of New South Wales (GSNSW)</b>			
General Extractive resources	Previously provided advice for the RLS in February 2018.  Acknowledged Councils efforts regarding the development of the RLS in considering mineral and extractive resources including the pragmatic approach to planning for these resources within Tweed LGA.  GSNSW comments remain unchanged.  GSNSW would appreciate the opportunity to review any proposed RU6 Zones in relation to Planning Direction 1.3 – Mining, Petroleum production and Extractive Industries.  GSNSW can work with Council to review and update sites notified in the Mineral Resource Audit – Tweed LGA.	Acknowledged.  Council welcomes the opportunity to work with GSNSW where appropriate.	For consideration of Council.

<b>Submission 101 - NSW Canegrowers Association</b>			
General Subdivision Housing Dwelling entitlement	<p>Canegrowers don't oppose relaxation of the 40 hectare rule as proposed by CTRIA in appropriate areas of RU2 land and those of a lesser rating, so long as it does not have the potential to impact on RU1 land and its associated farming activities.</p> <p>Supports the revision of Council's policy concerning the landowner's ability to have a second dwelling on a property without further subdivision to allow for intergenerational transfer of the farming business; sees a twofold benefit:</p> <ol style="list-style-type: none"> <li>a. Allow the business to continue as a profitable venture rather than see the property sold to persons unknown who may not continue the business. Lifestyle purchasers are a prime example of this when properties that are going concern revert to nothing more than weed producers.</li> <li>b. Removes some of the pressure now existing on aged care facilities within the Shire. With a second generation living on these properties the older generation can remain there for a longer period with support from the younger generation.</li> </ol> <p>Encourages Council to relax its policy regarding a second dwelling to allow for a worker's cottage without requiring a subdivision on certain rural properties on RU1 and RU2 land.</p> <p>Supports the concept of transferring a building entitlement from flood prone property to flood free land owned by the same person. This would bring Tweed Shire Council's Rural Land Planning Policy into line with all adjacent N.S.W. Local Government Areas.</p>	<p>Acknowledged</p> <p>Dwelling entitlements are not transferable. Should a landowner wish to test if a dwelling entitlement could be provided to an existing undersized allotment (less than the MLS and no known entitlement), the option exists to lodge a planning proposal to seek a change to the LEP. Until the planning proposal process has been completed no advice can be provided on whether a dwelling entitlement could be created.</p>	For consideration of Council.
<b>Submission 102 - Gold Coast City Council</b>			
General	Acknowledged receipt of Council's request and no comments provided.	Acknowledged	No action recommended.
<b>Submission 103 - Byron Shire Council</b>			
General Flexibility	The intention of deletions appears to be to largely maintain the 'status quo' in the RU1 and RU2 zones, which would have the potential to prevent many of the 'more flexible' land use outcomes that may have been possible through the Strategy (if these actions are not reinstated).	Acknowledged	For consideration of Council.

**Submission 104 –Rous County Council**

<p>Priority weed control Environment</p>	<p>Suggests that 'Delivery partners and key responsibility' be amended to either 'Rous County Council' or 'North Coast Regional Weeds Committee' depending on who the collaborative partnership is.</p> <p>Suggested that 'Related plans/strategies and notes' – 'Draft North Coast Regional Weed Management Plan' be amended to 'North Coast Regional Strategic Weed Management Plan' to give it its official title and to recognise that it is no longer a 'draft'.</p>	<p>Acknowledged and changes made accordingly.</p>	<p>Recommended that North Coast Regional Weeds Committee be approached regarding their inclusion as a delivery partner.</p> <p>Recommended that Related plans/strategies and notes' be amended as proposed.</p>
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