

Richmond Valley Regional Job Precinct

Response to Submissions Report

Draft Master Plan and Discussion Paper

March 2025

nsw.gov.au



Published by the Department of Primary Industries and Regional Development

Title: Response to Submissions Report Richmond Valley Regional Job Precinct Draft Master Plan and Discussion Paper

First published: March 2025

Acknowledgements

Cover image: Nammoona Industrial subdivision, Casino

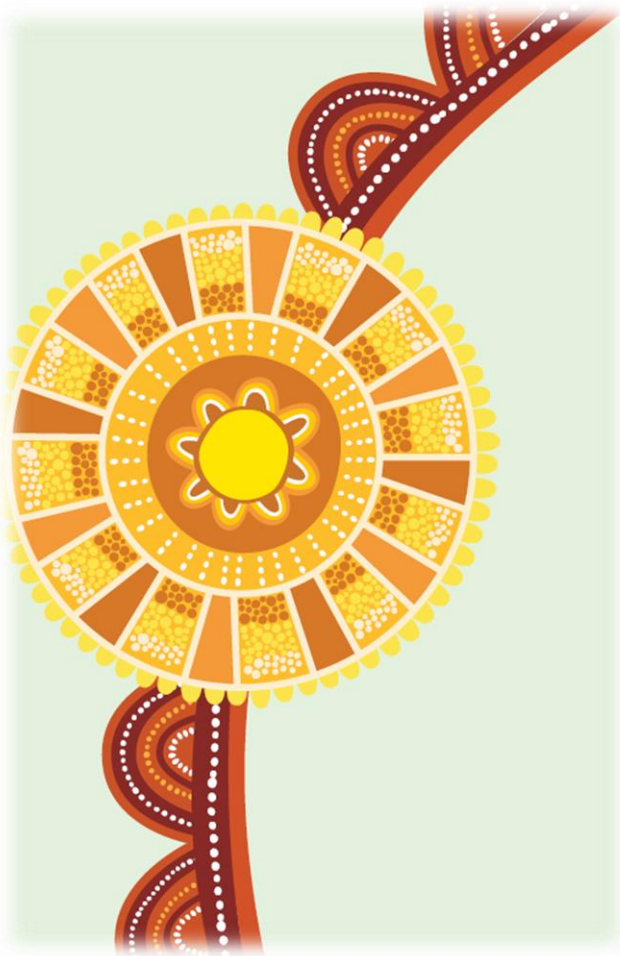
© State of New South Wales through Department of Primary Industries and Regional Development [2025]. You may copy, distribute, display, download and otherwise freely deal with this publication for any purpose, provided that you attribute the Department of Primary Industries and Regional Development as the owner. However, you must obtain permission if you wish to charge others for access to the publication (other than at cost); include the publication in advertising or a product for sale; modify the publication; or republish the publication on a website. You may freely link to the publication on a departmental website.

Disclaimer: The information contained in this publication is based on knowledge and understanding at the time of writing [March 2025] and may not be accurate, current or complete. The State of New South Wales (including the Department of Primary Industries and Regional Development), the author and the publisher take no responsibility, and will accept no liability, for the accuracy, currency, reliability or correctness of any information included in the document (including material provided by third parties). Readers should make their own inquiries and rely on their own advice when making decisions related to material contained in this publication.

Contents

Contents.....	3
Acknowledgement.....	4
1. Introduction.....	5
1.1 Purpose of the report.....	5
1.2 Background.....	5
1.3 Planning for the Richmond Valley Regional Job Precinct.....	7
2. Engagement.....	8
2.1 Engagement leading up to the exhibition of the draft master plan	8
2.2 Engagement during the exhibition of the draft Master Plan.....	8
2.3 How we engaged	9
2.4 Overview of submissions	10
2.5 Proposed changes to exhibited documents.....	11
3. Response to key issues raised in submissions	12
3.1 Theme: Support	13
3.2 Theme: Community engagement	13
3.3 Theme: Administrative and planning controls.....	15
3.4 Theme: Supply and demand	17
3.5 Theme: Land use and development controls.....	18
3.6 Theme: Air, noise and odour.....	24
3.7 Theme: Land use conflict and risk	25
3.8 Theme: Environment.....	27
3.9 Theme: Heritage.....	32
3.10 Theme: Soils, geology and contamination	34
3.11 Theme: Transport and access.....	35
3.12 Theme: Utilities.....	37
3.13 Theme: Hydrogeology	38
3.14 Theme: Staging.....	39
3.15 Theme: Funding and contributions.....	40
3.16 Theme: Out of scope	41

Acknowledgement



We acknowledge Country and pay respects to the Bundjalung people as the Traditional Owners and Custodians of the land and waters on which the Richmond valley Regional Job Precinct site is situated and connected to via a broader landscape.

We recognise their continued connection to Country and that this connection can be seen through stories of place and cultural practices such as art, songs, dances, storytelling and caring for the natural and cultural landscape of the area.

We recognise the continuing living culture of Aboriginal people and the significance of the Richmond Valley in that living culture. We recognise contemporary stories of displacement and the cultural significance of Bundjalung in the continued journey of self-determination in Australia.

We acknowledge that the land on which the Richmond Valley Regional Job Precinct stands was, is and always will be Aboriginal land.

1. Introduction

1.1 Purpose of the report

The draft Master Plan for the Richmond Valley Regional Job Precinct (the Precinct) was publicly exhibited by the Department of Primary Industries and Regional Development (DPIRD) and the NSW Department of Planning, Housing and Infrastructure (DPHI) from 12 February to 24 March 2024. During this time, landowners, stakeholders, and the wider community were invited to provide submissions on the exhibited documents.

At the same time, DPHI also exhibited a Discussion Paper outlining the explanation of intended effect of an update to the *Richmond Valley Local Environmental Plan 2012* (Richmond Valley LEP) and the proposed Richmond Valley Regional Job Precinct Development Control Plan (Richmond Valley Regional Job Precinct DCP).

The Department received a total of 64 submissions.

This report summarises:

- the engagement program during the exhibition period of the Richmond Valley Regional Job Precinct draft Master Plan and Discussion Paper,
- the feedback received and response to submissions, and
- the next steps.

The responses will guide the refinement of the Richmond Valley Regional Job Precinct Master Plan and technical studies, and the proposed Richmond Valley Regional Job Precinct planning framework.

1.2 Background

In January 2021, the Deputy Premier announced the establishment of the Regional Job Precincts initiative as an extension of the Special Activation Precincts program. These are part of the NSW Government's 20-year economic vision for Regional NSW. Special Activation Precincts and by extension, Regional Job Precincts, are one of the five regional priorities funded by the NSW Government's \$4.2 billion Snowy Hydro Legacy Fund. All \$4.2 billion is earmarked to be spent in regional NSW to build on the rapid growth and opportunities in the region.

Regional Job Precincts are focused on providing local councils with planning support to help drive investment and deliver on the NSW Government's 20 Year Economic Vision for Regional NSW.

The Richmond Valley precinct is one of the four locations selected based on site suitability and readiness to deliver economic benefits to their regions. The Richmond Valley precinct will build on the existing industrial precincts in Casino to create a hub focused on high-value agriculture, food processing, manufacturing, distribution, and renewable energy.

The Richmond Valley Regional Job Precinct Master Plan will be implemented over 20 years with planning outcomes forecasted to 2041 and beyond.

The NSW Government is leading the master planning that will provide local councils, regional communities, industry, and businesses with greater confidence around future investment and development.

Locations are chosen because they align with the following key assessment criteria:



Economic Enablers

- The economic enablers in the 20 Year Economic Vision for Regional NSW
- Proposed land use aligns with planning priorities



Unlocking Potential

- Planning improvements will create additional jobs



Readiness

- Site is ready for development
- Council or industry have done some work to plan for the precinct

Figure 1: Assessment Criteria for Regional Job Precincts Program

The process for each Regional Job Precinct follows six key stages:



1

Determine feasibility

Identify the gaps and barriers to economic growth in the local planning system.



2

Engage council

Collaborate with local council to address planning barriers.



3

Develop action plan

Prepare a plan outlining recommended changes to the local planning system.



4

Investigate precinct

Commission specialist studies and consult with the community.



5

Implement planning changes

Support and drive implementation of required planning instrument changes.



6

Implement the precinct

Provide ongoing case management and support investor attraction.

Figure 2: Regional Job Precincts process

1.3 Planning for the Richmond Valley Regional Job Precinct

The Richmond Valley Regional Job Precinct covers an area of 510 hectares, including approximately 335ha of industrial land. The precinct is focused on three (3) areas in Casino, comprising:

- Sub-precinct 1 – Nammoona Industrial precinct
- Sub-precinct 2 – Casino Food Co-op precinct (formerly Northern Co-op Meat Company)
- Sub-precinct 3 – Johnston Street Industrial precinct

Collectively, the three (3) sub-precincts are strategically located with access to the Bruxner Highway and Summerland Way, and the North Coast Rail corridor, with connections to other regional centres in NSW and Queensland.

The master planning process for the Richmond Valley precinct began in late 2021.

Technical experts investigated a broad range of issues including biodiversity, infrastructure, transport, Aboriginal culture and heritage to inform the Master Plan, updates to the Richmond Valley LEP and the creation of a future precinct wide development control plan.

The draft master plan and suite of technical documents evolved over a series of workshops held over a three-month period from January to April 2022. The workshops involved government agency representatives and specialist consultants and were designed to identify opportunities and constraints and establish a draft structure for the Richmond Valley precinct.

The agencies that have been involved in guiding the planning of the Richmond Valley Regional Job Precinct through an established Project Control Group, include:

- Richmond Valley Council
- Department of Primary Industries and Regional Development (including the Office of Regional Economic Development)
- NSW Environment Protection Authority
- NSW Department of Planning, Housing and Infrastructure
- Biodiversity and Conservation
- Transport for NSW

2. Engagement

2.1 Engagement leading up to the exhibition of the draft master plan

The early stages of planning were informed by community and stakeholder engagement that had been undertaken by Richmond Valley Council in relation to the Richmond Valley Local Strategic Planning Statement, Richmond Valley Growth Management Strategy and Casino Place Plan.

Key landowners within the precinct were informed of investigations related to their properties via briefing sessions, one on one meetings and correspondence.

Pre-exhibition engagement included consultation with three Registered Aboriginal Parties, who expressed an interest in the early stages of the heritage investigations.

The community was updated on the Richmond Valley precinct planning process via Richmond Valley Council community newsletters and via on-line updates on the Department's website. The intention of early engagement was to keep the community and key stakeholder updated and informed as plans were being developed.

2.2 Engagement during the exhibition of the draft Master Plan

The Department of Primary Industries and Regional Development has sought to genuinely engage with the community during exhibition of the draft Master Plan, Discussion Paper and support documents.

The draft Master Plan was prepared to provide a summary of the proposed planning for the Precinct, including an overview of the supporting technical reports, to assist the community to understand the documents as a whole.

The Department exhibited the draft Master Plan and Discussion Paper for a period of 42 days from 12 February to 24 March 2024. This included a two-week extension of exhibition in response to requests for more time for the preparation of submissions, taking the total exhibition to 6 weeks.

The aim of the engagement program was to raise awareness and seek feedback on the draft Master Plan and to respond to any questions regarding the content of the draft plans.

2.3 How we engaged

The Draft Master Plan, Discussion Paper and technical studies for the Richmond Valley Regional Job Precinct were exhibited on the NSW Planning Portal.

Key engagement and communication activities during exhibition included:

- Published notices-
 - On the DRNSW website and Council's On Exhibition website page.
 - DRNSW and Council Facebook posts
 - Community Views Newsletter article
- A Ministerial media release
- Post card notifications to landowners within a 500m radius of the precinct.
- Community drop-in sessions were held at the Casino Community Centre on 21 / 22 February 2024 and at the Evans Head Library on 23 February 2024.
- A business owners briefing was held on 21 February 2024.
- Key stakeholder briefings also took place on 21 / 22 February 2024.

Council officers attended the sessions with DRNSW and DPHI staff to discuss the documents and receive feedback. Approximately 60 people attended the information sessions and business briefing, and 7 landowner meetings were held.

All parties were encouraged to lodge a submission for consideration during finalisation of the master plan and planning amendments.

2.4 Overview of submissions

A total of 63 submissions were received during the exhibition of the draft master plan, including nine (9) from government agencies.

The government agency submissions are from:

- Richmond Valley Council
- Transport for NSW
- The NSW Department of Primary Industries – Agriculture
- Northern NSW Local Health
- The NSW Rural Fire Service
- The NSW Environment Protection Authority
- Heritage NSW
- The Biodiversity, Conservation and Science Group (BCS) of the NSW Department of Climate Change, Energy, the Environment and Water
- The NSW Department of Education, School Infrastructure

A submission was also received from utility provider Essential Energy.

Approximately 75% of the 63 submissions were from members of the community with concerns regarding Energy from Waste as a potential land use in the precinct.

A summary of the response to submissions is provided in Part 3 of this report.

2.5 Proposed changes to exhibited documents

The proposed response to submissions includes changes to the draft Master Plan, Discussion paper and technical reports, as described in Part 3 of this report.

The proposed changes include the following:

- Replacement of references to AWTS with EfW / AWTS throughout final documents
- Additional commentary to qualify references to EfW / AWTS in the technical reports
- New/amended definitions for 'renewable energy' and 'circular economy' in the Master Plan Glossary
- Adjustments to conservation zone boundaries to reflect the boundaries in the draft Structure Plan and the existing development approval for the Casino Rail Freight Terminal
- Retention of the existing industrial zoning for Mary Madden Park at the request of the Casino Historical Society
- Updates to the heritage report to include a recommendation regarding unexpected find procedures
- Additional commentary regarding the mitigation of potential impacts from existing surrounding agricultural uses
- Clarification of State-road infrastructure requirements additional emphasis on the need for ongoing engagement with TfNSW in the key 'Next Steps' in the Master Plan
- Review of active transport (i.e. pedestrian/cyclist) recommendations within the Nammoona sub-precinct
- Amended wording regarding the 'Education hub' to emphasise that additional investigation will be undertaken in consultation with the school community
- Insertion of revised Master Plan summary maps for each sub-precinct in the final Master Plan and technical reports
- Correction of miscellaneous errors and inconsistencies within master plan and technical reports

3. Response to key issues raised in submissions

Analysis of the submission identified 18 key themes which are detailed below including responses to issues raised within each of the key themes.

Key themes include:

1. Support
2. Community engagement
3. Administrative
4. Supply and demand
5. Land use
6. Air, noise and odour
7. Land use conflict and risk
8. Environment
9. Heritage
10. Soils, geology and contamination
11. Transport and access
12. Utilities
13. Hydrogeology
14. Staging
15. Funding and contributions
16. Out of scope

3.1 Theme: Support

During the exhibition period, some submissions provided general support for the Richmond Valley master planning and attracting new investment to the area.

Support

Submission Points

- Several submissions indicate general support for the Regional Job Precinct program.

Response

- Supporting comments are noted.

3.2 Theme: Community engagement

Concern was raised during the exhibition period in relation to lack of community engagement prior to exhibition and limited time to review the exhibition material.

Consultation

Submission Points

- The consultation process is a 'box-ticking' exercise that discourages and/or prevents in-depth engagement.
- Why is it only at Stage 4 that the community is invited to comment/participate in the development process.
- Key landowners in the precinct had very little involvement in the process. Limited invitations to workshops / stakeholder meetings.
- No genuine information was given to those who attended the community engagement sessions. The exhibited information was merely available with a spokesperson available to answer questions. There was no overview and no outline of significant points.

Response

- The Department has sought to genuinely engage with the community during exhibition of the draft master plan, discussion paper and support documents.
- The process for developing a draft master plan is described on pg. 6 of the master plan. A draft structure plan and twelve (12) technical reports were prepared by specialist consultants. The context of both the structure plan and technical reports were iterative and changing right up to the preparation of the draft Master Plan in Stage 4. It was not practical to engage with the community regarding a draft plan that was only partly developed.
- The community engagement for the Richmond Valley precinct builds on the engagement undertaken by Richmond Valley Council in preparation of the Richmond Valley Local Strategic Planning Statement, Growth Management Strategy and Casino Place Plan.

Consultation

- | | |
|--|---|
| <ul style="list-style-type: none">• Members of the community should have been provided with a detailed presentation on each of the reports with an opportunity to ask questions. | <ul style="list-style-type: none">• Landowners within the precinct have been engaged at various stages during preparation of the technical reports and draft master plan. |
|--|---|
-

Exhibition material

Submission Points

- Exhibiting a document without proper structure to inform or engage is not community consultation.
- Insufficient time provided to read and understand over 1,000 pages.

Response

- The draft master plan and supporting reports were placed on public exhibition, with the aim of providing a transparent and comprehensive basis for community engagement. The master plan provides a summary of the proposed planning for the precinct, including an overview of the supporting technical reports, to assist the community to understand the documents as a whole.
 - A two-week extension to the exhibition period was provided in response to requests for more time for submitters to read exhibition material and prepare a submission.
-

3.3 Theme: Administrative and planning controls

Submissions raised concerns with inconsistencies between the master plan and technical reports and terminology used and the assessment process proposed.

Inconsistencies

Submission Points

- Errors and inconsistencies in the draft reports, such as the need to qualify reference to the Casino-Murwillumbah Rail Line, as this line is no longer in operation.
- The zoning plans in Figure 7 of the Discussion Paper and Figure 9 of the Master Plan are not consistent with the zoning plan shown in Figure 1.1 of the Land Use Considerations. The objectives of Zone E5 Heavy Industrial include to provide areas for heavy industries, and hazardous and 'offensive' storage establishments that need to be separated from other land uses.

Response

- Errors and inconsistencies in the draft reports will be corrected as necessary.
 - The E5 Heavy Industrial zone is not proposed to be used. The zoning plan shown in Figure 1.1 of the Land Use Considerations report is a superseded plan and has been replaced.
-

Planning approvals and controls

Submission Points

- The Discussion Paper states the purpose of the regional job precinct initiative is 'to deliver faster planning approvals' and work closely with local councils to 'streamline planning processes.' This is a concern as it could compromise proper oversight of, and opportunity for, public consultation on proposed developments.
- Accelerated planning powers would contribute to further erosion of the community's confidence in Richmond Valley Council's planning processes.
- Why are the lot and height restrictions are being removed from land proposed to be zoned as RE1 Public Recreation?

Response

- References to 'deliver faster planning approvals' has been removed from the final master plan and technical reports. The Richmond Valley precinct process has included the preparation of specialist technical reports to support the preparation of a Master Plan and the rezoning of additional land for industrial development and employment growth. More detailed planning will be required to support specific proposals within the precinct at the development application stage. For example, the strategic air noise and odour investigations that have been undertaken for the precinct will need to be supplemented with specific assessments for individual proposals, to determine whether approval is appropriate and Environment Protection Licencing requirements will still need to be met for individual proposals.
- There are no accelerated planning powers being introduced as part of the regional job precinct program.
- The removal of height of building and minimum lot size provisions within the Richmond Valley precinct boundaries, is a recommendation from the draft Structure Plan technical report. It is proposed to 'remove barriers created by height of building provisions that unnecessarily restrict development outcomes in areas where building height will not significantly impact adjoining areas', and 'remove barriers created by minimum lot size provisions to facilitate adaptability to evolving market demand'.
- The maximum permissible building height in Casino's industrial areas is 8.5m. Based on historical approvals, the maximum building height has proven to be insufficient to accommodate industrial development, resulting in reliance on variations sought via Clause 4.6 of the Richmond Valley local environmental plan.
- A review of various regional local environmental plans confirms that industrial areas zoned to support General Industrial are often unlimited, or generally permitted a maximum building height of 11m or greater.

3.4 Theme: Supply and demand

Submissions included comments and concerns with the projected supply and demand of industrial land and housing capacity to support employment growth.

Supply and demand

Submission Points

- Comments provided regarding the projected supply and demand for industrial land.
- Housing for future employees will be a significant limiting factor. With population growth of 4,000 people and 1900 jobs forecast by 2041.

Response

- The Master Plan is based on population growth projections in the Richmond Valley Growth Management Strategy and Casino Place Plan, which have been endorsed by the Department of Planning, Housing and Infrastructure.
 - The Master Plan adds approximately 94ha of new industrial land in addition to the 241ha of land already zoned for employment purposes within the Richmond Valley precinct, of which around 130ha is already developed. The resulting 204ha of undeveloped industrial land is more than the 187ha that is predicted as necessary to meet demand over a 20-year period. The surplus will accommodate constraints and infrastructure as well as the reduction in industrial land from the proposed E3 Productivity Support zone. Inconsistencies in quoted supply and demand figures in the draft reports have been corrected.
 - The Richmond Valley Growth Management Strategy and Casino Place Plan identify residential investigation areas at Casino. The implementation of these investigations and approvals for new residential development will be a key initiative for Richmond Valley Council in the short to medium term.
-

3.5 Theme: Land use and development controls

Submissions provided comments and raised questions on specific land use types across the precinct.

Heavy Industry

Submission Points	Response
<ul style="list-style-type: none">Some of the documents show a zoning scheme that includes E5 Heavy Industry.Heavy industry is inappropriate close to significant wetlands and the eastern boundary of the Nammoona sub-precinct, near residential areas and the lawn cemetery.	<ul style="list-style-type: none">The use of an E5 Heavy Industrial zone was considered for parts of the Nammoona sub-precinct, in earlier stages of the Regional Job Precinct planning. However, the use of the zone is not required as the E4 General Industry zone in the Richmond Valley local environmental plan already permits 'heavy industry' with consent.All proposals for heavy industry are subject to a formal and rigorous development application process, including detailed assessment of potential impacts and community consultation.The E4 General Industrial zone has been proposed for the Nammoona precinct.The technical documents have been updated to replace references to the E5 Heavy Industrial zone.Where there are inconsistencies between the technical reports and the master plan, the master plan states that it prevails to the extent of any inconsistency.The term 'heavy industry' is a broad definition in the NSW Standard Instrument local environmental plan Dictionary that is included in the Richmond Valley local environmental plan. It covers a range of potential uses, which will require rigorous assessment due to the potential for hazardous and offensive impacts.The environmental significance of the wetland in the north of the Nammoona sub-precinct is acknowledged in the master plan. The wetland and buffers are proposed to be protected through C2 Environmental Conservation and C3 Environmental Management zones respectively.Vegetated buffers and water quality management is proposed to protect and improve the integrity of the wetland. The exact nature of these measures will be determined as part of any future development application/s when the nature of proposals can be fully assessed.It is proposed to apply the existing E4 General Industrial zone in Richmond Valley local environmental plan, as it is beyond the scope of the Richmond Valley precinct planning to review the uses 'permitted with consent' in the E4 General Industrial zone as it applies to other areas within the Richmond Valley local government area. Council may wish to review uses that are 'permitted with consent' in the E4 General Industrial zone separately to the Richmond Valley precinct process.

Heavy Industry

Recreation / Mary Madden Park

Submission Points

- What happened to Mary Madden Park?
It seems to have been swallowed by the western end of Nammoona.
- The Mary Madden Park land was given to the Casino Historical Society in 1977 and a park recognising the pioneering women of the district was created on the land and opened in 1980. The Society is considering future options for Mary Madden Park, including construction of a General Historical Museum, development of the site as a historic park or exchanging the land for an alternate site. The site is currently cleared and is maintained as open space.
- Wish to retain the current zoning of the land as industrial land.

Response

- Mary Madden Park was identified in the exhibition material to be rezoned to RE1 Public Recreation to acknowledge the existing use of the site and based on consultation with the Casino Historical Society, prior to public exhibition.
- The industrial rezoning will be retained on the site in response to the submission received.
- Retention of the industrial zone will maintain a wider range of options for the use of the site by the Historical Society.

Agriculture

Submission Points

- The Agricultural Land Assessment only looks at Sub-Precinct 3.
- Request that the proposed DCP controls also include provisions to ensure proposed development within the Richmond Valley precinct considers satisfactory mitigation of potential impacts from existing surrounding agricultural land uses.
- It is noted that the master plan indicates the use of a landscape buffer around the perimeter of the Richmond Valley precinct and this approach is supported. There does not however appear to be any detail of the buffer requirements which will be included in Council's development control plan. Preferred approach is for urban development and land used for agricultural production to be physically separated.
- Suggest that the E4 General Industrial zone permit 'intensive plant agriculture' with consent and specifically list 'viticulture' and 'turf farming' as prohibited land uses to permit land uses. If it is not appropriate to permit intensive plant agriculture generally in the E4 General Industrial zone, then suggest that it is included as an additional permitted use in the Richmond Valley precinct.
- Suggest that the E4 General Industrial zone permit 'intensive plant agriculture' with consent and specifically list 'viticulture' and 'turf farming' as prohibited land uses to permit land uses. If it is not appropriate to permit intensive plant agriculture generally in

Response

- The Agricultural Land Assessment is focussed on Area 3 because part of the Richmond Valley precinct investigation area in that location is identified as Regionally Significant Farmland in the North Coast Regional Plan. The rural land within and to the immediate north of the Nammoona sub-precinct is not identified as Regionally Significant Farmland, so does not need to be assessed as such, in accordance with the Regional Plan.
- Relevant agencies have offered general support for the Richmond Valley precinct noting that agriculture is a key industry in the North Coast region and the proposed outcomes of the master plan have the potential to provide significant support to the various agricultural industries in the region. Agencies note that a clause is proposed to require consideration of the relationship between proposed developments and surrounding land and that the clause is proposed to be supported by amendments to Council's development control plan.
- The provisions of the master plan and supporting documents have been amended to include reference to the need for development within the Richmond Valley precinct to consider mitigation of potential impacts from existing surrounding agricultural land uses.
- The provisions of the master plan and supporting documents have been amended to refer to a physical separation from surrounding agricultural land uses. This can be achieved through landscape buffers, perimeter roads, water management infrastructure or a combination of these measures. The development control plan can require an appropriate buffer or design solution to be provided on the urban land to mitigate any

Agriculture

the E4 General Industrial zone, then suggest that it is included as an additional permitted use in the Richmond Valley precinct.

- The Plan should acknowledge that industrial lots can include RU1 Primary Production zoned land.

potential impacts to and from the agricultural operations.

- An additional permitted use for 'Intensive plant agriculture' in the Johnston Street sub precinct E4 General Industrial zone has been added to the Richmond Valley local environmental plan in consultation with Council.
 - An additional permitted use is proposed to allow the 'cultivation of irrigated crops for commercial purposes (other than irrigated pasture or fodder crops)' on land zoned E4 General Industrial within the Johnston Street sub precinct.
 - Viticulture and turf farming will continue to be prohibited in the E4 General Industrial zone.
 - The RU1 Primary Production zone does not allow industrial land uses. The Master Plan does not need to address the function of land with split zones as this will be controlled through appropriate local environmental plan and development control plan provisions.
-

Education

Submission Points

- Understands that the plan aims to provide a strategic planning framework to guide business seeking to establish or expand in the region.
- Seeks amendment to the wording in the draft master plan to emphasises that the existing education site be identified as “Education Hub – Subject to Additional Investigation”. Relevant investigations will be undertaken as to the suitability of such opportunities as well as engagement with the current school community. Joint use of this site has not been discussed and the draft Plan should not be worded in a way as to create expectations without detailed consultation.
- Casino’s Own Wireless Inc (COW FM) operates from the education site and seeks to be registered as a stakeholder with an interest in any proposal to develop the site in the future.

Response

- The requested amendment to wording has been included in the final master plan and technical reports. The proposed SP2 zone permits any development that is ordinarily incidental or ancillary to education.
- The proposed change to an SP2 zone will not prevent the continuation of existing uses, subject to any existing consent requirements which should be addressed in consultation with Richmond Valley Council.

Rail Freight / Intermodal

Submission Points

- Growth of the agriculture, manufacturing and related industries (such as the waste management/energy from waste) is a necessity for the region. Only when combined with the establishment of an elevated, risk redundant intermodal & industrial development that will connect Nammoona & Northern Rivers to the world, will this be able to happen.
- We note that there is continual reference in the technical of 'casino rail freight terminal'/northern intermodal, on rural zoned land. This is not an intermodal terminal, and under its conditions it cannot be as it is not zoned industrial and it is subject to environment, biological and flood mitigation risks.
- Concerned the master plan and discussion paper do not reflect the existing approval for the Casino Rail Freight terminal.

Response

- The master plan retains intermodal rail access options in the north and south of the Nammoona sub-precinct to reflect an existing development consent.
- The master plan does not change the existing approval for the Casino Rail Freight Terminal or conditions placed on the consent. Any modifications to the existing consent will be subject to a modification application and assessment.
- Minor adjustments to the land zoning configuration have been made to reflect the existing approval for the Casino Rail Freight terminal.

3.6 Theme: Air, noise and odour

Submissions raised concerns with air quality and noise impacts of the precinct and that consideration of traffic in the air, noise and odour report had not been included.

Air, noise and odour

Submission Points

- The air, noise and odour report flags that there is a medium to high risk of impact to 'receptors' or 'receivers' (i.e. Casino residents and high school students) from existing industries 'due to the relatively close proximity of these existing receptors to existing industrial activities'. The report describes a significant history of odour complaints and the need for adequate buffers. And yet, despite this, even more high-emission industries are considered suitable in the Richmond Valley precinct in the absence of these buffers.
- Air quality and noise impacts are limited to the actual developments and do not consider the impacts of increased traffic volumes along the impacted roads in built-up areas.

Response

- The air, noise and odour technical report identifies areas of medium to high risk related to existing uses (e.g. the Casino Co-op), however this is qualified to note that these uses remain subject to existing approvals and licencing requirements. The air, noise and odour report notes that: This is a strategic risk assessment, with conservative assumptions regarding the emissions from these uses and the applicable standards to be met at receptors.
 - A sensitive receptor boundary has been established around the Richmond Valley precinct in the air, noise and odour report whilst noting that 'It is also assumed that appropriate planning measures will be put in place to ensure that there are no sensitive receptors within the sensitive receptor boundary and that the use of existing dwellings within the Richmond Valley precinct boundary will be resolved in conjunction with staged development of the Richmond Valley precinct'.
 - The impact of increased traffic on residents in Casino is a function of overall growth in Casino and surrounding areas. The Richmond Valley precinct is only part of this growth. Cumulative impacts on air quality will be a matter for consideration as part of overall transport and growth planning.
-

3.7 Theme: Land use conflict and risk

Concerns are raised on managing hazardous development within the Richmond Valley precinct along with conflicts between existing and proposed residential development.

Land use conflict and risk

Submission Points

- One of the most potentially hazardous industries is the AWTS and yet it is not identified.
- The reference to 'energy infrastructure' in Section 2.2.2 should be clarified. Is it a bio energy plant?
- Chapter 3, Part 3 of the State Environmental Planning Policy (Resilience and Hazards) 2021 requires preparation of a preliminary hazard analysis when a development application is submitted for a potentially hazardous or offensive industry. How will this be consistent with the promised 'streamlining' of planning processes supposedly offered by adoption of the Master Plan?
- The Land Use Considerations report shows houses in and around the Nammoona and Food Co-op sub-precincts. What will become of those houses and their occupants? What happens if the owners don't agree with the subdivision? Are their continuing use rights simply over-ridden?
- Licenced activities within the Richmond Valley precinct must consider existing and future residences to reduce the likelihood of land use conflict in the future.
- There is a planned residential development to the north-west of the Richmond Valley precinct.

Response

- There is uncertainty whether an EfW /AWTS proposal will be considered at Nammoona and if so, what type, scale and location of operations may be proposed. Any proposal to build such a facility must go through the formal and rigorous development application process, including detailed assessment of any hazard issues and community consultation. The Land Use Considerations report has been updated to note that: 'The detailed support studies for any future EfW/AWTS proposal will need to assess the potential for safety hazards associated with the proposed operations'.
- The statement in Section 5.5 of the Land Use Considerations section of the master plan has been expanded. The master plan confirms that 'The proposal is to process waste product from the abattoir and other sources to produce energy which can be used to make the Co-op operations more sustainable. This state-of-the-art technology will allow the Co-op to utilise an existing waste product. It is subject to a separate State Significant Development application, which is being assessed.'
- The Co-op proposal is not related to the NSW Energy from Waste (EfW) Framework. The Framework does not apply to biodigesters because they are biological processes utilising biogas. The proposal, whilst not an EFW facility, will be subject to detailed assessment, approval and licencing requirements including community notification and engagement.
- The regional job precinct program and master plan will not streamline planning assessment processes. Preliminary hazard assessments will

Land use conflict and risk

- Potential conflict with future residential development at Fairy Hill.
 - Supports the proposed local environmental plan clause and supporting development provisions to reduce land use conflict within and surrounding the Richmond Valley precinct for both residential and industrial land uses. Seek additional detail regarding proposed buffer requirements in the development control plan.
- be required as part of future development applications, in accordance with relevant legislation.
- The existing dwellings in the Nammoona sub-precinct are already zoned for industrial uses. Future development assessments will take into consideration the presence of sensitive receptors at the time of the assessment, including existing residences in the precinct. The master plan notes that the existing dwellings in the precinct are expected to transition to industrial use, acknowledging that they are in an existing industrial zone, and that this is likely to be a factor in the staging of industrial development in the Nammoona sub-precinct. Owners will not be forced to sell or move because of development in the Regional Job Precinct.
 - Scheduled activities will continue to be subject to site-specific assessment and environment protection licencing by the EPA.
 - The modelled Richmond Valley precinct sensitive receptor boundary crosses over the Urban Growth Area (UGA) boundary identified in the North Coast Regional Plan at South Fairy Hill. The structure plan and master plan recommends a reduction to the UGA to exclude the land within the modelled Richmond Valley precinct sensitive receptor boundary. Amendments to the UGA boundary can be considered as part of the next review of the North Coast Regional Plan and any planning proposal to rezone land at Fairy Hill.
 - The provisions of the master plan and supporting documents have been amended to refer to a physical separation from surrounding agricultural land uses. This can be achieved by landscape buffers, perimeter road, water management infrastructure or a combination of these measures.
-

3.8 Theme: Environment

Inconsistencies, and details on management of flooding and biodiversity have been raised through the submissions.

Flooding

Submission Points

- There are inconsistencies between the flood impact assessment assumptions and the Casino Rail Freight Terminal detailed design (e.g. assessed Riparian Corridors)
- The flood impact assessment assumed flow paths through the CRFT property which are incorrect and do not match man-made drainage channels.
- The Primex site was not flood affected in 2022.
- Concern that Casino's existing stormwater problem will be made worse by the Richmond Valley precinct. Stormwater flooding in this part of town needs to be very carefully and urgently addressed within and beyond the Richmond Valley precinct.
- Which residential areas precisely are going to benefit from this new flood channel? Just the newer areas or will this also stand to affect people who live in the older areas?

Response

- The flood impact assessment is a simulation. More detailed assessment is required at the development application stage. The new 2022 Guidelines regarding riparian corridors are recommended for inclusion in the Richmond Valley development control plan as best practice. Existing consents can be implemented where already commenced.
- Council will need to review watercourses in Figure 5.1 of the master plan in consultation with flood consultants. The identification of stream order and drain lines was done as part of a regional flood assessment of the Richmond Valley precinct lands. The suggested change to the man-made drainage channel will have no impact on the regional flood dynamics of the area.
- The flood Impact assessment considers a range of predicted flood events, including floods greater than the 2022 event. The assessment indicates that in larger events the Primex site does flood and that fill of the site is required to facilitate industrial development. The extent of this fill needs to be limited to avoid exacerbating flood impacts on adjoining residential land to the south.
- The flood impact assessment has modelled the impact of proposed fill within Richmond Valley precinct on the broader area. The extent of proposed fill in the Richmond Valley precinct has been limited to avoid adverse impacts on surrounding residential areas in Casino. The management of flooding and stormwater drainage in Casino will remain a key responsibility for Richmond Valley Council.

Flooding

- Existing drainage issues are not expected to be exacerbated by proposed development in the Regional Job Precinct.
 - The impact of fill areas in the Richmond Valley precinct is most directly relevant to residential areas immediately adjoining sub-precinct 3.
 - The extent of benefit to other areas is less clear from the flood impact assessment model. It is clear, however, that the construction of a new, larger drainage channel out of Casino, will improve drainage out of East Casino during major flood events.
-

Biodiversity

Submission Points

- The Biodiversity Technical Report highlights a threat to species with high biodiversity value, including communities listed as vulnerable, endangered or critically endangered under the (Cth) Environment Protection and Biodiversity Conservation Act (EPBC Act) and/or the (NSW) Biodiversity Conservation Act (BC Act).
- The biodiversity report is largely based on desktop research.
- Biodiversity offsets simply enable development at the cost of wildlife and the environment.
- Inconsistent areas of proposed C2 Environmental Conservation zone presented throughout supporting documents.
- Biodiversity provisions expand conservation areas, limiting the economic use of rural land. The existing

Response

- The presence of significant flora and fauna species is noted in the biodiversity technical report. This has formed the basis for key recommendations in the Master Plan and Discussion paper, particularly in the north of the Nammoona sub-precinct. The findings and recommendations in the biodiversity report have been reviewed by the relevant agencies. The proposed expansion of existing conservation zones in north Nammoona is supported by relevant agencies.
 - Desktop research is a standard process in the preparation of specialist reports. Agencies have considered the biodiversity survey effort as part of their review. Further survey work and consideration of relevant environmental legislation will take place at the development applications stage.
 - Biodiversity offsets are options included in legislation for development. The Biodiversity Offsets Scheme provides a mechanism to avoid, minimise and offset the impacts of development
-

Biodiversity

Casino Rail Freight Terminal approval provides for these areas to remain grassland for bushfire management purposes.

- Any industrial development close to the conservation zones of Upper Nammoona will be a threat to flora and fauna. The proposed E4 General Industrial and E5 Heavy Industrial zones should revert to RU1 Primary Production.
- Development will adversely impact on the watercourses and lakes of Upper Nammoona and eventually flow down to the Richmond River via the tributaries of Barlings Creek, affecting the indigenous and non-indigenous flora and fauna as it goes.
- There is an extensive list of developments that are permissible with consent in the C3 Environmental Management zone under the Richmond Valley local environmental plan, including 'electricity generating works' and other intrusive and inappropriate developments. The C3 Environmental Management zone provides no protection at all to the special ecological, scientific, cultural or aesthetic values this zoning is meant to protect or enhance. All areas proposed for zoning as C3 Environmental Management should be zoned C2 Environmental Conservation.

and some types of clearing on biodiversity in New South Wales.

- The Conservation zone boundaries in the exhibited Discussion paper are incorrect and have been amended to reflect the zone boundaries in Figure 39 of the Structure Plan.
- The biodiversity report and master plan prioritise the preservation of local biodiversity and threatened species where significant environmental values exist.
- The proposed expansion of the E4 General Industry zone in north Nammoona is generally confined to existing, cleared grazing land above the floodplain.
- Buffers are proposed around the wetland, incorporating existing areas of vegetation, to assist in managing the interface with future industrial development.
- The proposed C3 Environmental Management zone will apply to buffers around the main wetland in north Nammoona and will provide scope for the management of edge effects.
- Water quality has been considered in the hydrogeology, water quality and demand analysis, and in the flood impact assessment.
- Consideration has been given to the local catchment flows and water quality performance and stormwater generation performance targets in north Nammoona. Recommendations include the indicative size and location of bioretention systems to manage water quality. The design of these systems will be considered in more detail at the development application stage.
- The extent of the C2 Environmental Conservation and C3 Environmental Management zones is based on the recommendation in the specialist technical reports and has been determined in consultation with the Biodiversity, Conservation and Science

Biodiversity

Group of the NSW Department of Climate Change, Energy, the Environment and Water. It is proposed to apply the existing C3 Environmental Management zone in Richmond Valley local environmental plan, as it is beyond the scope of the Richmond Valley precinct planning to review use of the C3 Environmental Management zone throughout the Richmond Valley local government area. Council may wish to review uses that are permitted with consent in the C3 Environmental Management zone separately to the Richmond Valley precinct process. The C3 Environmental Management zone objectives will apply in the assessment of future proposals.

Bushfire

Submission Points

- Future development on mapped bushfire prone lands will need to apply the relevant legislation pathways and compliance with Planning for Bushfire Protection guidelines.
- A Wetland Management Plan exists for the proposed C3 Environmental Management zone which aims to reduce fuel load and bushfire risk. The proposed C3 Environmental Management zoning as per the biodiversity report is not sustainable due to upstream impacts and Cattle impacts which are unavoidable if vegetation growth is to be controlled.

Response

- Planning has taken into consideration the bushfire prone land mapping.
- New development within the precinct can be designed to meet the requirements of Planning for Bushfire Protection 2019. The Master Plan includes recommendations regarding:
 - updates to existing bushfire prone land mapping to align with the NSW RFS Guide for Bushfire,
 - preparation of a complementary bushfire management and mitigation strategy, and
 - preparation of controls within the Richmond Valley DCP to ensure APZs are established sequentially until the final phase of development is completed.
- Conservation and buffering requirements will need to be addressed as part of any new development application in the proposed zones. Agriculture is a prohibited use in the existing C2 Environmental Conservation and E4 General Industrial zones. Water management and bushfire protection measures can be incorporated into the overall subdivision design and do not need to be wholly contained within the C3 Environmental Management zone area.
- The existing C3 Environmental Management zone in Richmond Valley local environmental plan is flexible and enables a range of uses, including agriculture. Council may wish to undertake a review of permitted uses in the C3 Environmental Management zone separately to the Richmond Valley precinct process, noting that this has implications for other industrial areas in the Richmond Valley and is beyond the scope of the Richmond Valley precinct program. Existing consents will continue to apply where they have been commenced. Fire management is to be done through the construction of Asset Protection Zones in line with Rural Fire Service requirements.

3.9 Theme: Heritage

Comments have been provided in relation to the investigations and proposed management recommendations included in the technical report. Concerns were raised around the impacts and consideration of Mary Madden Park and the Nammoona Lawn Cemetery.

Master Plan

Submission Points	Response
<ul style="list-style-type: none">• Note the investigations have been undertaken in accordance with National Parks and Wildlife Act 1974, in consultation with Registered Aboriginal Parties and with reference to the relevant guidelines.• Agree with the proposed management recommendations relating to Aboriginal heritage (Section 15.1).• The outcomes of the Aboriginal cultural heritage assessment need to be used to inform the planning proposal.• Opportunities to conserve Aboriginal heritage sites must be considered as part of the current Master Plan as well as during future land development. In particular, options to preserve the identified culturally modified trees must be prioritised based on the increasingly rare occurrence of this site type in the region.• Based on the information provided, do not believe that there are any identified impacts on items listed on the State Heritage Register.• Do not believe that there are any identified impacts on items listed on the State Heritage Register.• Implementation of an unexpected 'relics' procedure during future works within the Richmond Valley precinct	<ul style="list-style-type: none">• The culturally modified trees identified as part of the Casino Rail Freight Terminal development application process are required to be protected in accordance with Aboriginal Heritage Impact Permit.• An additional culturally modified tree identified in the technical report on the Casino Rail Freight Terminal land, is located in an area that will be zoned C3 Environmental Management. Protection of the tree is proposed in conjunction with the establishment of environmental buffers around the wetland.• Further, more detailed investigation of Potential Archaeological Deposits will be required in conjunction with future development proposals and avoidance and mitigation options will be explored, as necessary.• Richmond Valley local environmental plan Clause 3.3 excludes complying development from environmentally sensitive land (including land identified in an environmental planning instrument as high Aboriginal Cultural Heritage Significance.• Proposed development control provisions can include provisions for sensitive heritage areas for further, more detailed consideration at Development Application stage.• Section 15.3 of the Heritage report has been amended to recommend an Unexpected Find Procedure in Development Control Plan Provisions.

Master Plan

- | | |
|--|--|
| <p>area is sufficient to meet obligations under the Heritage Act 1977.</p> <ul style="list-style-type: none">• Mary Madden Park has not been considered as a site of potential historic significance.• It is unclear whether representatives of the Aboriginal community have been consulted.• The landscape surrounding the wetland in the northern part of Nammoona has been identified as being of Aboriginal cultural significance and at risk from polluting industries (such as an AWTS) that might be built in the Richmond Valley precinct.• The existing building height limit of 8.5m should be maintained to limit visual impacts on the Nammoona Lawn Cemetery. | <ul style="list-style-type: none">• The Mary Madden Park land was given to the Casino Historical Society in 1977. It is not considered to have historic significance.• The preparation of heritage report included engagement with three (3) Registered Aboriginal Parties.• Protection of heritage values is proposed in conjunction with the establishment of environmental buffers around the wetland. Development provisions are proposed, including water quality performance and stormwater generation performance targets. More detailed assessment will be undertaken as part of the preparation and assessment of future development applications.• Development provisions are proposed to guide merit assessment of development applications, with specific provisions related to key Richmond Valley precinct frontages, such as Summerland Way. The Master Plan recommends specific DCP provisions in relation to the frontage to the Nammoona Lawn Cemetery. |
|--|--|
-

3.10 Theme: Soils, geology and contamination

Concerns were raised on the level of analysis undertaken in the technical reports and the inclusion of water sensitive urban design.

Soils, geology and contamination

Submission Points

- The Soils, Geology and Contamination Report relies on desktop data and does not consider future industrial, which will increase the likelihood of damage to the soils and contamination of the area.
- There are many contaminants of concern in the Nammoona area, which could be exacerbated in the future if an AWTS is ever built in Nammoona.
- Water sensitive urban design (WSUD) principles should be applied in the proposed development areas to mitigate potential changes to soil water levels and salinity conditions in the catchment, and to minimise environmental degradation.

Response

- The soils, geology and contamination report provides a desktop review of background information relating to soil salinity, acid sulphate soils and potential for contamination based on existing and historic land use. The report identified there is no salinity hazard and an extremely low probability for acid sulphate soils within the Richmond Valley precinct boundary. The report concludes that further, more detailed survey and assessment is not warranted at this stage of planning.
 - Consideration of potential contamination may be required as part of detailed site investigations, including for any EfW / AWTS proposal.
 - Water sensitive urban design is considered in the hydrogeology, water quality and demand analysis, and in the Flood Impact Assessment.
 - The principles of WSUD form the basis for recommendations in the technical reports. A review of Part I-9 of the Richmond Valley Development Control Plan (Water Sensitive Urban Design) is recommended. This is a design consideration and is not expected to constitute a significant constraint on future development in the precinct.
-

3.11 Theme: Transport and access

Submissions raise concerns with the level of detail in the traffic assessment, the capacity of the road network and required upgrades.

Transport and access

Submission Points

- Recommend that a summary of state infrastructure works and delivery triggers should be included in the master plan and supporting documentation.
- Limited assessment of traffic volume increases in Casino.
- Concerns with the capacity of the existing road network to accommodate traffic increases associated with the Richmond Valley precinct (e.g. Queensland Road adjacent to Casino High School, West Street, and the Johnston Street roundabout), including increased heavy vehicle movements, road safety and impacts on school zones. Roads in Casino are already potholed and narrow, with minimal road shoulders and there is a trend of crashes at mid-block locations and intersections in the built-up areas in Casino.
- Increased development in sub-precinct 3 will obviously increase traffic along Spring Grove Road, Naughton's Gap Road, and the Bruxner Highway. Yet there is no real mention of any serious upgrades to the local road network to cater for this increase.
- The predicted 175m queue lengths in 2041 for a right turn off Summerland Way onto Reynolds Road is unacceptable. This will likely result in unsafe turning movements and

Response

- Post exhibition engagement with TfNSW has established that necessary improvements to the 6 intersections directly associated with the Richmond Valley precinct can be addressed in existing and ongoing planning by Richmond Valley Council, in consultation with TfNSW.
- A table summarising the key intersection works and proposed timing will be included in the traffic report and referenced in the Master Plan.
- The key 'Next Steps' on p.77 of the draft Master Plan will be amended to emphasise the need for ongoing engagement with TfNSW.
- Traffic counts and SIDRA modelling have been undertaken as part of the traffic analysis. Assumed traffic growth includes allowance for growth outside the Richmond Valley precinct, including projected population growth at Fairy Hill over a 20-year period.
- The Richmond Valley precinct investigations focus on 6 key intersections associated with the Richmond Valley precinct in consultation with Richmond Valley Council and Transport for NSW.
The traffic report includes a general assessment of the road network, in consultation with Richmond Valley Council and Transport for NSW.
- The impact of increased traffic on residents in Casino is a function of overall growth in Casino and surrounding areas. The Richmond Valley precinct is only part of this growth. The management of overall traffic growth and road safety on the road network in Casino will be an ongoing issue for Richmond Valley Council and

Transport and access

accidents and should be resolved with proper intersection upgrades.

- The traffic assessment omits the development of the Abattoir site and any potential traffic volume increases associated with it.
- The proposed removal of the Summerland Way / Hillcrest right turn lane / chevron is ridiculous.
- The road transport heavy vehicle mass limits for sub-precincts 1 and 2 should allow for the loading of full shipping weight containers.
- Active Transport / Pedestrian access at Nammoona should be internal to the precinct rather than along Reynolds Rd, to separate pedestrians from heavy vehicle movements and due to ease of gradient.

Transport for NSW. The Master Plan identifies the preparation of an Infrastructure Servicing Strategy as a key next step. Road safety will be a key factor in these ongoing investigations.

- The Traffic Assessment considers intersection upgrade requirements on the Bruxner Highway and Spring Grove Road, including the Johnstone Street/East Street intersection. Two intersection options have been included on Spring Grove Road to/from the Regional Job Precinct.
- Preliminary sight distance assessment has been undertaken at the intersection of Reynolds Road and Summerland Way. Sufficient sight distances exist for an 80km/h road to meet Australian Standard, and only minor modifications are required to extend the right-hand turn slip lane on Summerland Way to 175m in length.
- The abattoir site is already substantially developed and no major growth has been assumed in sub-precinct 2, following discussions with the Co-op during development of the Master Plan. The volumes of vehicles using Hillcrest Lane are minor and the SIDRA modellings shows existing Level of Service A in AM and PM peaks.
- Traffic management solutions can be explored, in more detail, in conjunction with future development proposals for the Co-op site.
- Maximum vehicle weight is dependent on the type and size of vehicles that are able to access the precinct, as determined by the National Heavy Vehicle Regulator. PBS2b vehicles are currently not permitted to travel on Summerland Way, north of Casino. However, TfNSW mapping shows the Summerland Way, Reynolds Road and Dargaville Road as accessible to B-double vehicles up to 25/26m in length.
- The Master Plan refers to improvements to Reynolds Road and active transport improvements to Summerland Way as two

Transport and access

separate items. Internal collector roads are shown in the draft Master Plan for sub-precinct 1, will provide options for active transport links within the precinct, separate to Reynolds Road. This has been clarified in the final Transport technical report and can be considered in more detail by Council in DCP and pedestrian and access mobility planning.

3.12 Theme: Utilities

Submissions raised concerns with utility upgrade requirements and the location for new pipes.

Utilities

Submission Points

- The Utilities Infrastructure Analysis Report includes information on electricity supply related to an EfW / AWTs but is inconsistent on whether an AWTs may be constructed. The report states that the 11kV feeder currently servicing the Nammoona sub-precinct would need to be upgraded if there is significant additional load added to the development area.
- There is no mention of any powerline or substation upgrades required should an additional power supply, such as an EfW incinerator become operational in the sub-precinct.
- The Master Plan should allow for a micro grid within sub-precinct 1.
- Indicate agreement with all comments around the essential energy infrastructure. Looking at the proposed potential load the best outcome will be a new Zone Substation on the north-west Corner of Area 2 as mentioned in the reports. This would be able to cater

Response

- The references to EfW / AWTs in the Utilities report are part of a high-level strategic analysis of possible future infrastructure demand in the Nammoona sub-precinct. It is not intended to imply that EfW / AWTs will take place and it is therefore important that any comments are appropriately qualified.
- The master plan notes; 'There are no proposals for Alternate Waste Treatment Systems (AWTs) in the Nammoona sub-precinct and Council is not currently investigating AWTs. For this reason, the Richmond Valley precinct master plan does not propose a specific site for AWTs in the Nammoona sub-precinct'.
- The master plan does not prohibit the consideration of micro grids. Each development will need to demonstrate connection to electricity at DA stage in consultation with Essential Energy. Alternative energy sources such as micro grids can be considered at the DA stage.
- Ongoing engagement is proposed with Essential Energy regarding infrastructure delivery.

Utilities

for future loads as required. Everything in the Utilities Infrastructure Analysis Report looks reasonable with suitable trigger points.

- The proposed water pipeline across C2 Environmental Conservation zoned land, as illustrated in Figure 21 of the draft master plan, represents prohibited development in that zone.
- The water pipe through conservation zone should be replaced with two lines to service either side of the conservation zone in the final Plan, as an extension from the Saleyards on Dargaville Drive.
- The CRFT drainage design relied on stormwater capture to provide non potable water for the precinct, which helps to maintain stormwater quality. Of note is that upstream impacts (fertiliser, urban run-off etc) all impact storm water quality.

- The mapping in Figure 21 of the draft master plan is based on Figure 6.2 of the draft Utilities report. The location of the water pipeline is indicative. A pipeline is not proposed to be constructed in the C2 Environmental Conservation zone. Council advises that any extension to the water main provided would be required to connect to the main at the intersection of Reynolds Road and Dargaville Drive and then head north within the road reserve.
- Detailed design will be required to determine the location of the proposed water pipeline more accurately.
- It is noted that stormwater capture was part of the CRFT approval and that upstream flows exist into the CRFT site. Bioretention facilities are recommended in the reports to improve water quality in the overall catchments, including the wetland areas.

3.13 Theme: Hydrogeology

Submissions provided comments in relation to water requirements, contamination affecting groundwater and water storage options.

Hydrogeology

Submission Points

- Table 8.5 of the Hydrogeology report shows estimated water requirements for an AWTS.
- The Hydrogeology report (p.14) also mentions a 'plume associated with a contamination source' (i.e.an AWTS) and identifies the constraint this will have on accessing groundwater.

Response

- The Hydrogeology considered water demand from a EfW / AWTS operation, as a possible major water user in the precinct. This was a high-level assessment only, to assess whether there is water supply capacity for the precinct as a whole.
- Ultimately, it was not possible to predict with any certainty whether an EfW / AWTS proposal will occur, what type and scale of operation

Hydrogeology

- | | |
|---|---|
| <ul style="list-style-type: none">• The water storage options map (Figure 9.1, p.44) includes a future water pipe courtesy of Rous County Council. The option for Rous to supply water to Casino would have to be dependent on Dunoon Dam being built, to which there is enormous community opposition. | <p>might be proposed and where it might be proposed.</p> <ul style="list-style-type: none">• The reference to impacts from plumes is a general comment and is not related specifically to EfW / AWTs. Any future proposal for EfW will be subject to a separate development assessment process.• The comments regarding opposition to the 'Potential Rous Future Connection', as shown in Figure 9.1, are noted. This has been included as an option for consideration by Richmond Valley Council, as part of an overview of water supply options. |
|---|---|
-

3.14 Theme: Staging

There is concern with the staging identified for the precinct.

Staging

Submission Points

- The staging of development at Nammoona from south to north is restrictive and could have the effect of preventing development should southern landowners choose to land bank their land rather than to develop.

Response

- The staging conclusions relate to efficient delivery of infrastructure. They are indicative, and out of sequence development can be considered by Council with appropriate infrastructure servicing solutions.
 - Pg 65 of the master plan provides recommendations to enable flexibility within sub-precinct 3 for out of sequence development.
 - No changes are required to facilitate out of sequence development consideration.
-

3.15 Theme: Funding and contributions

Submissions raised concerns with the feasibility of employment lands and how basic infrastructure will be funded.

Funding and contributions

Submission Points

- The development of Employment Lands in Regional NSW needs to be commercially feasible and competitive with South East Queensland.
- Commercial funding is not readily available for this style of development and the cost of providing basic infrastructure to develop industrial land such as power supply, sewage and water is prohibitive.
- State Government Funding for infrastructure should be considered.
- The owners of the Primex site should not be required to bear the cost of any works being recommended in this report, as the downstream impact is the RVC drain on Spring grove Road. This has been reported to the Council and would be noted within the reports as a major contributor to backflow and flooding at that location.

Response

- The comments regarding economic feasibility are noted.
- The completion of the master plan will provide greater certainty to investors that the necessary planning has been undertaken, in turn improving commercial viability and promote jobs growth.
- The Richmond Valley precinct program does not include State government funding for infrastructure. However, the work undertaken can inform infrastructure planning by Council and service providers.
- Infrastructure design, feasibility and funding mechanisms will be considered in more detail during preparation of an Infrastructure Servicing Strategy and Critical flood mitigation works, which are listed as Next Steps of the master plan (p.77).

3.16 Theme: Out of scope

Some items raised in submissions are out of scope of the Richmond Valley precinct Program and Richmond Valley project.

Conflicts of interest

Submission Points

- The potential for conflicts of interest involving staff and elected representatives in the Department and Richmond Valley Council.

Response

- The Department has a Code of Ethics and Conduct in place that governs our obligations around declaring conflicts of interest and maintaining confidentiality. The Department is satisfied that all systems and procedures have been followed for the Richmond Valley project and is not part of the scope of engagement.
-

Land use

Submission Points

- Note that the precinct may be suitable for a pilot 'urban agriculture' land use on the land east of the sewerage treatment plant and suggest that 'urban agriculture' could be permitted as an additional permitted use on this land to provide opportunity for emerging agricultural industries such as insect farming, hydroponic food production or aquaponics, which may not fit within existing agricultural definitions.

Response

- Creating a new land use term is out of scope for the Richmond Valley precinct program as this is a consideration for the statewide standard instrument local environmental plan.
-

Energy from waste

Submission Points

- Strong objection to Energy from Waste, including concerns regarding:
 - damage to reputation as a clean/green area
 - impacts on the agricultural productivity of surrounding land
 - proximity to Casino's established Food Cooperative and residential areas
 - toxic contamination of land, water and air
 - health impacts on surrounding residents
 - waste being transported in from other local government areas
 - disposal of toxic ash waste from an EfW facility
- The draft Master Plan does not show where an EfW operation might be placed, what capacity it would have, where the waste for incineration might be sourced, how it might be transported, or where ash would be disposed of.
- There has been inadequate consultation and no transparency to date in the decision-making process leading to Casino's selection for either an Richmond Valley precinct or a potential site for an EfW facility. This is contrary to the Integrated Planning and Reporting Framework which states that engagement, consultation and transparency in both planning and reporting are essential.
- The Richmond Valley precinct should be removed from clause 144 of the Protection of the Environment Operations Regulation 2022.

Response

- The Richmond Valley Regional Job Precinct is being planned to facilitate a wide range of industry types, with a focus on job creation in the Richmond Valley.
- There is currently no formal proposal to build an energy from waste facility in the Richmond Valley area. If one were made, the application would need to be assessed on its merits and comply with relevant planning and environment laws and requirements, including the NSW Energy from Waste Policy Statement.
- EfW facilities are already permitted with development consent in the Nammoona part of the Richmond Valley precinct in accordance with State Environmental Planning Policy (Transport and Infrastructure) 2021 and the Protection of the Environment Operations (General) Amendment (Thermal Energy from Waste) Regulation 2022. See also the NSW Government's Energy from Waste Infrastructure Plan (2021).
- Energy from Waste is not defined in Richmond Valley local environmental plan but is permissible with consent at Nammoona in accordance with *State Environmental Planning Policy (Transport and Infrastructure) 2021* and the *Protection of the Environment Operations (General) Amendment (Thermal Energy from Waste) Regulation 2022*.
- The hatched areas shown as 'Potential higher intensity industry' on p.31 of the master plan are based on the Richmond Valley precinct air, noise and odour report, which concludes that these parts of the precinct are potentially more suitable for higher emitting industries.
- Any future proposal for heavy industry or EfW / AWTs will be subject to detailed assessment, including specific air, noise, and odour modelling to ensure there is adequate

Energy from waste

- Concern regarding use of the terms ‘renewable energy’ and ‘circular economy’ in the context of Energy from Waste
 - Concern regarding use of the term Alternate Waste Treatment System (AWTS) instead of Energy from Waste (EfW) to avoid drawing attention to EfW in the draft Master Plan.
 - Some of the technical reports supporting the draft Master Plan include assumptions related to inclusion of an EfW facility in the precinct.
 - Northern NSW Local Health recommends that any proponent, whether that be Council or private industry, be required to have a Health Impact Assessment undertaken as a mandatory condition of a development application and consent process for any waste disposal options considered in the future, particularly energy from waste projects. The HIA must follow the enHealth guidelines. The above advice for a mandatory HIA condition must be provided as part of the SEARs (Secretary’s Environmental Assessment Requirements) process, and that NNSWLHD and North Coast Public Health Unit be part of this process.
 - We suspect, from the hatching or purple shading of some areas as being ‘suitable’ for heavy industry, that the EfW incinerator may be located immediately adjacent to the significant wetland in the northern half of the Nammooma precinct.
 - separation from sensitive receptors, and reduced risk of conflict with surrounding development’.
 - It is beyond the scope of the Richmond Valley precinct investigations to review the provisions of State Environmental Planning Policy (Transport and Infrastructure) 2021 and the Protection of the Environment Operations (General) Amendment (Thermal Energy from Waste) Regulation 2022.
 - The draft Master Plan does not present a case for or against energy from waste (EfW). It does not include specific recommendations regarding EfW and it does not aim to provide a streamlined planning pathway for energy from waste initiatives.
 - Regional job precinct locations were identified and assessed based on Functional Economic Region boundaries, alignment with local planning priorities (as identified in Council’s Local Strategic Planning Statement) and economic development potential.
 - The pursuit of ‘renewable energy’ and ‘circular economy’ outcomes is a key aim for the Richmond Valley precinct. Both terms are broad and have not been used in the Draft Master Plan to mean EfW / AWTS operations.
 - The term ‘circular economy’ incorporates a hierarchy of strategies - in order of priority - from refuse, rethink, reduce, reuse, repair to recycle. A circular economy can include EfW / AWTS as part of the ‘recycle’ principle.
 - The term ‘renewable energy’ also encompasses a range of strategies, including solar and wind technologies and the proposed Co-op Biohub.
 - Simple definitions for both terms can be included in the Master Plan glossary.
 - Energy from Waste has been described as Alternate Waste Treatment Systems (AWTS) in the draft master plan, with the aim of achieving consistency with the terminology used by
-

Energy from waste

Richmond Valley Council in consultation with the community. Definitions of EfW and AWTS have been provided in the draft Master Plan Glossary.

The AWTS definition will be reviewed to emphasise that this encompasses a range of alternate waste management solutions, including energy from waste. The references to AWTS in the Richmond Valley precinct Master Plan and associated reports will be amended to 'EfW / AWTS'.

- EfW / AWTS is considered at a high level in some of the technical reports (e.g. when considering possible future water demand in the Hydrogeology report). This has been done as part of high-level strategic planning, noting that EfW is a permitted use, in the absence of more definite information regarding future use. There is no assumption that EfW / AWTS will take place in the Nammoona sub-precinct in the Master Plan.
 - The references to EfW / AWTS in the technical reports can be further qualified to note that: The reference to EfW / AWTS is not an indication that EfW will be proposed or approved in the Nammoona sub-precinct. Any proposal to build such a facility must go through the formal and rigorous development application process, including community consultation.
 - It is beyond the scope of the Richmond Valley precinct process to determine specific Secretary's Environmental Assessment Requirements for State Significant Development proposals.
-

© State of New South Wales through Department of Primary Industries and Regional Development [2025]. The information contained in this publication is based on knowledge and understanding at the time of writing [March, 2025]. However, because of advances in knowledge, users are reminded of the need to ensure that the information upon which they rely is up to date and to check the currency of the information with the appropriate officer of the Department of Primary Industries and Regional Development or the user's independent adviser.