

Manager, Centres and Urban Renewal:
Department of Planning & Infrastructure
GPO Box 39, SYDNEY NSW 2001

Dear Sir/Madam:

RE: SUBMISSION ON DRAFT NEWCASTLE URBAN RENEWAL STRATEGY 2012

Thank you for the opportunity to make this submission in response to the public exhibition of the draft Newcastle Urban Renewal Strategy 2012 (NURS).

While this submission raises significant concerns regarding key aspects of the NSW Government's draft NURS, it also supports a number of specific initiatives contained in the draft strategy, as outlined below.

The key flaws of the draft NURS are:

1. The Executive Summary to the NURS states that "it [i.e., the Strategy] supports the government's recent decision to replace rail services with bus services from a new transport interchange at Wickham" (p.xvi). In fact, the strategy does not support that decision at all. A number of the proposed initiatives in the Implementation Plan that forms Part 6 of the NURS are actually based on the *retention* of the rail line between Wickham and Newcastle, and the support documentation for the strategy (the Appendices) explicitly state that they were developed with either retention or removal of the rail line in mind. Moreover, a number of the key catalyst strategies identified for revitalisation of the CBD would clearly benefit from the retention of the rail line (especially the proposed CBD university campus). The decision to remove the rail line was made on political rather than planning grounds. The only credible previous studies on the question of removing the rail line have demonstrated that it would be bad public policy to do so. In the few cases where studies have supported removal of the line, they have been shown to be methodologically or substantively flawed (e.g., the Hunter Development Corporation's 2009 study).
2. The transport initiatives outlined in the NURS are highly unlikely to achieve even the modest objective for increasing the modal share of public transport to and from the CBD stated in the NSW 2021 plan (and quoted on p.122 of the NURS). Some of the general statements (e.g., the commitment to "encouraging use of public and active transport forms, which will contribute to the reduction of greenhouse gas emissions" (p.4) and "growing patronage on public transport" (p.13)) are given no substance in the strategies and actions, and are likely to be embarrassing for the state government in the light of the decision to cut rail services between Wickham and Newcastle station.
3. The guiding principles (pp.62-63) contain no commitment to any environmental or social equity objectives. The test of a genuinely revitalised CBD will be the extent to which it contributes positively to the quality of life of current and future generations. This will depend as much (if not more) on the extent to which the CBD is environmentally sustainable, and is able to meet the needs of all its current and future users. The strategy is too focussed on a narrow set of economic and market outcomes, and on the needs of commercial stakeholders.

4. The form and content of the strategy do not proceed logically from the guiding principles outlined on p.xiv and again on pp.62-63). The nine principles are generally supportable (albeit requiring a statement of commitment to ecological sustainability). But these laudable statements are rarely reflected in the strategies and actions in the remainder of the NURS. A well-constructed strategic plan should provide a clear and traceable relationship between vision, principles, strategies and actions. Drawing this relationship is part of the discipline of strategic planning (I taught how to write strategic planning documents for more than 20 years at tertiary level). The NURS does not do this - I suspect because its authors may have recognised that many of the actions they propose would not be easily accommodated under the guiding principles, and that to attempt to draw such linkages might expose these deficiencies. The consequence of this, however, is that the document lacks strategic rigor, clarity and accountability. I suggest that the form be amended to comply with established best practice, and to provide a clear relationship between the guiding principles and the associated strategies and actions.
5. The strategy does not deal adequately with the problem of mine subsidence as a financial driver of overdevelopment in the CBD. The development of an equitable and workable approach by which grouting of mine-works can be undertaken with public money and subsequently levied from developers is strongly supported.
6. The strategy purports to support heritage, but in fact provides very little in terms of a planning approach to ensure that the CBD's heritage is maintained and protected. The built heritage of the Newcastle CBD is one of the city's most valuable resources for revitalisation, and the strategy should provide the basis for strengthening its protection.
7. Height limits of 90m are too high to maintain the human scale that is one of Newcastle's key advantages as a liveable city. There appears to be very little planning justification for such heights.
8. The strategy overstates the provision of public open space in the CBD (p.32). In fact, there is very little high amenity public open space in either Honeysuckle or Newcastle West. Both areas need more thought in terms of the provision of high amenity public open space.
9. The strategy's reliance on s.94 Developer Contributions as a key funding source for many of its proposed initiatives is seriously misplaced, given the meagre funds that have been collected from these recently.
10. The section on "Social Infrastructure" (3.14, p.55) appears to be both inadequate and anachronistic. It does not account for the need for health and education facilities, and it identifies a number of social infrastructure assets with an uncertain future (e.g., the Loft Youth Centre, currently under threat of closure by Newcastle City Council).
11. The proposed privatisation of the Ocean Baths, through the construction of a restaurant and boutique hotel. The Newcastle Ocean Baths are an important public heritage asset, and should not be privatised. The coast (including the Baths) is one of Newcastle's most precious assets - unlike the CBD, it does not need "revitalisation", and any commercial activity on the coast will compete with, rather than contribute to, commercial activity in the CBD. Put commercial activity where it belongs and is needed: in the commercial areas of the CBD, not on our precious coastline.
12. The proposal to promote the Honeysuckle precinct as the preferred location for A-grade office space (p.214). There is no substantial justification for Honeysuckle effectively monopolising such development - in fact, such an approach has impeded the revitalisation of

the rest of the CBD, and there is no good reason why a significant amount of A-grade office space could not - and should not - be located in new developments in the western precinct.

13. Proposals for Hunter St that would compromise effective bus priority lanes. These are a key transport planning priority, but they may not be possible to achieve with the proposed mix and configuration of pedestrians, cyclists, buses and motorists, with the addition of trees on both sides of the street. It may be necessary (and preferable, for safety and logistical reasons) for King St to accommodate dual segregated cycleways (one each side of the road).
14. Any future landscaping or development of Wheeler Place that does not recognise and respect the original intention to provide for a "town square", including a place of assembly for parades, marches, rallies, etc. I believe that both options presented in the draft NURS (the "cluster of palms" and the "bosquet" compromise that intention, obstructing the open space with large trees. I strongly support more tree planting around the city (especially in Civic Park, and the replacement of the unnecessarily removed giant figs in Laman St), but tree plantings in Wheeler Place should be kept to the perimeter of the square to maintain its utility as a place of public assembly.

However, this submission supports the following specific initiatives outlined in the draft NURS:

- The strategy's support for a university CBD campus as a key catalyst for CBD revitalisation (though the projected numbers appear to be inflated, given the university's intention to use the CBD facilities for distance learning). The Auckland / Hunter St area is an appropriate location for such a facility, though the height of any new building on the site should be in keeping with the generally low heights of other nearby buildings.
- The development of a targeted development action plan to recognise and promote cultural infrastructure and cultural industries and the important role they play in the city centre (p.214), including - as an obvious priority - the proposed redevelopment of the Newcastle Art Gallery recently axed by Newcastle Council, partly as a result of lack of state government financial support.
- The proposal to create a "behavioural change working party to develop and implement a behavioural change program" (p.217) in relation to transport, provided that the focus of the working party and program are on promoting the benefits of public and active transport, and greater use of these transport modes.
- The proposed restoration of the Victoria Theatre as a performing arts venue (p.214), and the refurbishment of Stegga's Emporium.
- The strategy's support for dedicated cycle lanes (it is highly regrettable that the state government removed requirements for such cycle lanes from the Honeysuckle Development Control Plan in the 1990s). However, many of the pictures in the document do not indicate the firm physical separation that is necessary to ensure safety - European examples should be used for how to do this.
- The proposal to condition end-of-trip facilities for cyclists in the DCP (App 3, p.18).
- The proposed upgrading of the pedestrian link bridge to the waterfront and associated works in the square (p.211).
- The proposed introduction of Workplace Travel Plans for CBD workplaces (perhaps as a consent condition on approved DAs?)

- Car pooling / sharing models - though these will need ongoing coordination and awareness, and perhaps modest funding. The proposed behaviour change working party could do this (with appropriate funding).
- The strategy's support for productive landscapes and urban food production in suitable areas (albeit not identified).

Thank you once again for the opportunity to make this submission. I have been concerned at the lack of public input into the development of the strategy, so I look forward with great interest to seeing how the state government responds to the many submissions it will receive from the public on this important strategy for our city's future.

Regards

John Sutton

19 April 2013.