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General Manager, Hunter & Central Coast Department of Planning and Environment PO Box 1226, NEWCASTLE 2300

Dear Madam/Sir

Draft Hunter Regional Plan and Draft Plan for Growing Hunter City - Comments

I have reviewed the Draft Hunter Regional Plan and Draft Plan for growing Hunter City and wish to make the comments below.

It is important to acknowledge the key role that regional planning has had in the Hunter Region over the last 40 years and how this role is expected to continue and adapt in the future. Previous plans should be reviewed and acknowledged, since they provide the context for the current proposals. In particular, it would be valuable to outline how the current plan differs from previous plans and why this is the case.

A key issue underpinning the effectiveness of these plans is the regional governance framework and the relationship between local plans, state policies, and national investment decisions and priorities. Unfortunately, both draft plans on exhibition fail to meaningfully identify priority issues to be addressed in regional and state planning, and do not provide a suitable governance framework or program for addressing these.

The plans reflect the policies and practices of the past, not the needs of the future. A 20 year planning strategy requires at least a 50 year time horizon. A major weakness in both plans is the failure to provide supporting data to justify the proposed vision, directions and actions of the plans. This is essential if the business and general community are to make informed investment decisions in building the region into the future.

The significant innovation in both plans is to identify a 'Hunter City' metropolitan area, and to recognise this as one planning area, separate from the Sydney Metropolitan Area. While this is welcome, the definition of this area and its purpose is confusing and has many inconsistencies. The boundary does not reflect the functional urban areas in the Lower Hunter or local and regional communities of interest, or statistical and administrative boundaries. There is no evidence that it has been defined according to any proper study or analysis of relevant factors. Consideration should be given to redefining the Hunter metropolitan boundary to ensure it can be usefully recognised and applied in future planning and investment programs.

An important implication of the 'Hunter City' concept is that if it is to operate as a truly metropolitan-scale functional area that is competitive with other metropolitan areas within Australia and globally, then a step-change improvement in inter- and intraaccessibility will be required. The critical step taken in similar regions overseas has been to initiate major (multi-billion dollar) programs to upgrade and integrate regionalscale public transport networks to improve access to jobs, tertiary education and cultural opportunities, promote regeneration, and create a more economically dynamic region. The draft plans contain no initiatives in this direction, whilst the effect of recent decisions has been to substantially downgrade public transport accessibility. The 'Hunter City' concept requires more than a name change, but a completely different approach to infrastructure provision, planning and regional governance.

My specific proposals for the draft plans are outlined below.

Draft Hunter Regional Plan

The aims in the plan should be clear and specific and must address the key long term issues for regional land use planning. Aims should be as follows:

- 1. Facilitating the transition to a zero carbon emission economy.
- 2. Development underpinned by no net loss of regional biodiversity.
- 3. Expanding a sustainable public transport network to underpin urban accessibility, and reduce the need for private cars.
- 4. Creating a globally competitive and connected region with high amenity and liveability, that is able to attract people to invest and live in it.
- 5. Building resilience in the face of natural hazards such as storms, floods and bush fires and supporting decentralised services and infrastructure.
- 6. Supporting sustainable agricultural production and land use.
- 7. Effective rehabilitation and restoration of land disturbed by coal mining and industrial use.

Effective plan implementation relies a wide range of other plans and processes. Rather than simply stating what the NSW Government will do, it is also important to specify how things will be done. To implement the vision and to balance the different planning

goals, the regional plans should articulate "planning principles" to be applied in decision-making. These are criteria intended to act as a guide to balancing competing interests. Principles need to be weighed against each other in each individual situation and should be as follows:

A. Preservation of the landscape by -

- protecting agricultural cultivable land;
- integrating settlements into the landscape;
- maintaining and facilitating public access to the coast, river banks, and lakes;
- · conserving biodiversity, natural areas and recreational areas;

B. Arrangement of settlements according to the needs of the inhabitants and limitation of settlements by -

• appropriate location of homes and workplaces with adequate public transport links;

• protection of residential areas from harmful effects and nuisances such as noise and air pollution;

- creation of cycle tracks and footpaths;
- · creation of suitable conditions for the supply of goods and services;
- integration of numerous green open spaces and trees in settlements.

C. Appropriate location of public infrastructure and buildings by

- considering regional needs and reducing inequalities;
- ensuring good accessibility of public facilities;

• minimising adverse effects of these facilities on environment, people and the economy.

Bringing these principles into the plans will ensure that they can be effective and relevant as planning tools to support the NSW Government vision for the region and local decision-making.

Draft Plan for Growing 'Hunter City'

The following amendments are suggested to the draft plan for Growing 'Hunter City':

- The region's metropolitan area boundary should be reviewed and redefined. The boundary should be defined in conjunction with the Australian Bureau of Statistics (ABS) using similar criteria to that used for other metropolitan regions [ie a Greater Capital City Statistical Area (GCCSA). The boundary has a major bearing on the provision of services and infrastructure, which are currently provided at a lower standard than if the area was classified as 'metropolitan' and adversely affects competitiveness with other Australian metropolitan regions.
- 2. The metropolitan boundary would be likely to substantially co-incide with the current ABS SA4 area and be restricted to the existing Newcastle and Lake Macquarie local government areas east of the M1 Motorway, plus industrial and urban development north to, and including Newcastle Airport.

- 3. The plan should include principles to apply within the metropolitan area. These planning principles would be complementary with those identified for the Hunter Region as outlined above. Key principles would include:
 - a. including a single metropolitan planning and governance framework, and integrated public transport planning and management,
 - b. locating development according to accessibility principles and requiring that travel-generating development (housing, employment, education, health etc) be closely tied to the regional metro network, which would define the broad urban structure or urban 'backbone'.
- 4. The metropolitan area requires a public transport network underpinned by rail providing inter- and intra- regional connections. The plan needs to spatially identify the location of key elements of the network which are:
 - a. protecting an east coast high speed rail (HSR) corridor through the region,
 - b. protecting the corridor for an intercity Glendale HSR Kurri Kurri Maitland rail link (provides a Newcastle freight bypass),
 - c. investigating a potential intercity rail link to Newcastle Airport,
 - d. developing a regional metro network.
- 5. With the aim of no net loss of regional biodiversity, a regional biodiversity offset strategy and fund should form part of the plan implementation program.
- 6. The plan should identify a major program to address the legacy of environmental degradation resulting from a century and a half of mining and heavy industry. This should be undertaken as part of the transition to a globally competitive service economy within a high quality environment. Important candidates would be the Lower Hunter Wetlands and the region's many mining voids. Such projects would be of great symbolic significance, and have significant implications to regional image and tourism opportunities.
- 7. The plan should identify the boundaries of water and sewer service areas, and a staging plan for future infrastructure provision.

The Draft Hunter Regional Plan and Draft Plan for growing Hunter City provide an important opportunity to support economic development and sustainable land use in the region, to raise the profile of the region's metropolitan opportunities at the state and national level, and to support improvements to the liveability and economic prosperity of the region.

I hope that these comments will assist in further development of these plans.

Yours sincerely

M. Fallding

Martin Fallding **Principal, Land & Environment Planning** 7 March 2016