

Planning and Regulatory.PChrystal/JGaynor
Ref: 4779959
Phone: 02 4974 2879



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Ms Monica Gibson
Director Regional Hunter and Central Coast
Newcastle Regional Office
Department of Planning and Environment
PO Box 1226
NEWCASTLE NSW 2300

PO Box 489, Newcastle
NSW 2300 Australia
Phone 02 4974 2000
Facsimile 02 4974 2222
Email mail@ncc.nsw.gov.au
www.newcastle.nsw.gov.au

Dear Ms Gibson

SUBMISSION ON THE DRAFT HUNTER REGIONAL PLAN AND THE DRAFT PLAN FOR GROWING HUNTER CITY

I refer to the above matter and thank you for the opportunity to make a submission on the draft plans.

Newcastle City Council supports the introduction of a new regional plan for the whole of the Hunter Region and commends the Department of Planning and Environment on its willingness to engage with stakeholders to determine the final form and content of the Plans.

Regional planning has a significant role to play in the future prosperity and liveability of the Hunter region, including Newcastle. Strong regional planning is imperative to ensure that coordinated planning across LGA boundaries can be achieved. Issues such as regional transport and infrastructure provision, regional habitat corridors and regional land supply to meet living and employment demands are all issues that are difficult for Councils to address individually. The focus of this submission is to ensure the regional planning framework can provide Newcastle City Council with the necessary context within our region to support more effective planning at the local level.

Not only will the final Regional Plans influence Council's strategic planning framework it will also shape the expectations of the community and the development industry in relation to land use and infrastructure planning. For these reasons, it is important that the final Regional Plan is based on robust evidence and clearly defines the framework for growing the Hunter Region and be supported by smart, measurable and achievable actions. Most importantly, the maps within the Regional Plans should be detailed enough to provide a snapshot of the key features, constraints and opportunities across the region. Council's comments set out in the submission, include recommendations that Council considers will improve the clarity and usability of the Regional Plans.

Thank you again for the opportunity to be involved in this important planning initiative for the Hunter Region. Should you have any questions in relation to this submission please contact Patricia McCarthy, Coordinator Urban Planning on 4974 2879.

Yours faithfully

Peter Chrystal
DIRECTOR PLANNING AND REGULATORY
Encl.

Newcastle City Council Submission on the Draft Hunter Regional Plan and Draft Plan for Growing Hunter City

1. Draft Hunter Regional Plan

1.1 Structure

- a) For simplicity and consistency in regional and metropolitan plans it is recommended that the Hunter Regional Plan and Plan for Growing Hunter City be consolidated into one plan and renamed "A Plan for Growing the Hunter".
- b) For ease of reference, the final Regional Plan should contain a summary table of the directions, associated actions and commitments.

The provision of two Regional Plans for the Hunter seems unnecessarily complex and cumbersome. Other examples of recent regional planning are contained within a single document, for example, the Draft Central Coast Regional Plan and Illawarra-Shoalhaven Regional Plan. Even Sydney also only has one plan: 'A Plan for Growing Sydney'. A Plan for Growing Sydney is comprised of six sub regions or districts (that includes 41 Local Government Areas). The Hunter Regional Plan also identifies four landscape sub-regions - including Hunter City. Hunter City, in turn, is comprised of five districts. It is recommended these be consolidated within the single plan.

Combining the two Plans and renaming the document 'A Plan for Growing the Hunter' would better reflect what the document is - a guide for development and investment in the Hunter Region. For ease of reference, the plan should contain a summary table of directions and associated actions. It also needs to be made more apparent that 'Growing the Hunter' benefits the communities of the Hunter. For example, the Plan should show how future infrastructure will be delivered via growth in the Region.

1.2 Operation and Delivery of the Plan

- a) Council supports the establishment of a Coordination and Monitoring Committee, particularly to support infrastructure delivery; however, this should not become another layer of decision-making that would add complexity or delays to local planning processes.
- b) Given the significance of Newcastle University and the John Hunter Hospital to the region it is recommended that the NSW government agencies responsible for planning education and health facilities should be included in the coordination and monitoring committee.
- c) Consideration should be given to the establishment of a 'Metro Newcastle Area Commission', similar to the Sydney Commission.

Council supports the establishment of a Coordination and Monitoring Committee to monitor delivery of the plan and to support infrastructure delivery. However, Council would be concerned if the Committee were to become another layer of decision making that would add complexity or delays to local planning processes.

The draft Hunter Regional Plan focuses on hard infrastructure. While this is clearly important, 'soft infrastructure' such as health and education also need to be considered within the plan. The John Hunter Hospital and the University of Newcastle have been identified as 'strategic centres' with a specific direction for growth and diversification.

In addition, the expected population growth and change necessitates the direct involvement of the NSW government agencies responsible for education and health facilities to be included in the proposed coordination and monitoring committee.

The draft Plan includes the statement "*The scale of Hunter City and its significant potential warrant a metropolitan approach to planning*". If a metropolitan approach to planning is warranted, it also stands to reason that a metropolitan approach to the operation and delivery of the Plan is necessary. The establishment of a "Metro Newcastle Commission", similar to the Sydney Commission, could help achieve this.

1.3 Vision

- a) To ensure the vision for the Hunter also reflects the vision identified by local communities, it should be amended to encompass social and environmental outcomes in addition to economic outcomes.

The draft Plan states the Government's vision and goals for economic growth and how the government will act to achieve these goals and what it expects from local councils in realising the vision. While the document is no longer referred to as a 'Regional Growth Plan', the emphasis of the vision, goals and directions appears to remain on economic growth. The draft Plan would benefit by including goals emphasising that the Hunter will continue to be a great place for people.

Based on consultation with the Newcastle community, undertaken in the preparation of the Community Strategic Plan (CSP), our community established a vision for Newcastle to become a "smart, liveable and sustainable city", through better connections between places, protecting the environment, activating places, being a caring and inclusive community that has a liveable and distinct built environment, being a smart and innovative city with open and collaborative leadership. The Regional Plan should also reinforce this integrated, sustainable approach to planning.

The Regional Plan should demonstrate the link between economic growth and investment in the region and realising a broader community vision as contained within the CSP.

1.4 Goal 1: Grow Australia's Next Major City

- a) For consistency in terminology with other regional plans, identify a metropolitan area that should be referred to as 'Metro Newcastle'.
- b) The Metro Newcastle area should generally be defined as the geographical area around Newcastle, northern Lake Macquarie and southern Port Stephens.
- c) To avoid confusion around the purpose of the hinterland, clearly map and define the function of this area.
- d) Include statements in the directions and actions clarifying the benefits in growing the Hunter, such as in Direction 1.1: Grow and diversify centres across the City to provide affordable, enjoyable living.

Council has reservations about the concept of, and nomenclature of, Hunter City, and it is suggested that Newcastle continues to be recognised as the Regional City. Terminology should be similar to that used in the Illawarra-Shoalhaven Regional Plan and the Plan for Growing Sydney, which both refer to 'metro' areas.

It appears that there is some indecision as to whether to consider the Hunter a region or a metropolitan area such as Sydney. This should be resolved rather than have a hybrid plan. It is also unclear what is to be achieved through the creation of 'Hunter City'.

Declaring this expansive area as a metropolitan area similar to Sydney raises significant expectations in relation to services and infrastructure provision, however, this is not addressed in either of the draft Plans.

The proposed 'hinterland' cannot be a rural lifestyle / rural production area and a place for urban growth. These mixed messages often lead to future land use conflict. It is important that this area be clearly mapped and its function clearly defined and delineated.

1.5 Goal 2: Grow the Largest Regional Economy in Australia

- a) Include a specific action to investigate the diversification of the industry base across the region to assist in determining employment land needs and the infrastructure (including transport) required to support it.

Council supports the action to support sustainable growth of mining industries and to diversify NSW energy supplies. Support for diversifying the energy supply will open up new investment and employment opportunities as the mining industry starts to decline. A specific action to investigate the diversification of the industry base across the region would be of benefit and assist in determining employment land needs and the infrastructure (including transport) needed to support it.

1.6 Goal 3: Protect and Connect Natural Environments

- a) All maps should be more detailed and the Regional Habitat Connectivity map should be similar to that provided in the Lower Hunter Regional Strategy and Newcastle Lake Macquarie Western Corridor Strategy to provide enough clarity and certainty.
- b) Actions should be reviewed and amended to demonstrate how the impacts of development will be minimised on land of high environmental value and regional habitat corridors.
- c) Clearly outline how the assessment, protection and management of focus areas for sustaining regional habitat connectivity differs from the areas of high environmental value.
- d) Give consideration to a regional biodiversity certification process as this may fit with the biodiversity fund that has been established.
- e) Recognise the importance of the Hunter estuary to the region within the final Regional Plan.
- f) Ensure the actions relating to the health of coastal lakes and estuaries consider both stormwater quality and quantity to ensure that the health of significant wetlands can be appropriately managed.

At its meeting on 1 March 2016 Council's Environmental Advisory Committee recommended:

"Council include in its submission as part of the Draft Hunter Regional Plan and Draft Plan for Growing Hunter City, to protect biodiversity corridors across the local government area, including the Watagans to Stockton green corridor."

Council supports the inclusion of mapping of high environmental value land and the identification of regional habitat corridors, and its public availability through planning e-view. The implementation of appropriate strategies to protect and manage habitat connectivity and high environmental land will also provide greater certainty for investment.

However, the generality of the maps, actions and directions in the draft Plan does not provide clear guidance on this land. For example, Council has reviewed the draft Plan in relation to Council owned land at Black Hill. In the Lower Hunter Regional Growth Plan, the Council owned site was mapped as 'Watagan Stockton and Wallarah Green Corridor' and later in the Lake Macquarie Western Corridor Planning Strategy 2010, the site was identified as 'employment lands investigation'. Council is unable to determine whether the land is high environmental value or employment lands investigation under the draft Regional Plan. The mapping of regional habitat corridors should be at a finer scale (not necessarily to individual parcel accuracy, but finer than large arrows on a map) to provide greater certainty for all stakeholders.

The associated actions need to demonstrate how the maps will be used to minimise the impacts of development on areas of high environmental value. It is not clear from the actions whether or not it is proposed to introduce new legislation to protect high environmental value land or to introduce a new framework for the assessment and management of biodiversity offsets. The associated actions should clearly demonstrate how protection and management of regional habitat corridors will be achieved. The Regional Plan should clearly specify that bio-banking offsets should target these regional corridors. The Plan should also clearly outline how the assessment, protection and management of focus areas for sustaining regional habitat connectivity differs from the areas of high environmental value.

The Hunter estuary is the most important estuary in NSW for shorebirds and is internationally protected and this should be recognised within the Regional Plan. Both stormwater quantity and quality impact on the health of wetlands in this area. The Hunter wetlands are the receiving environment for the urban release areas of the inner west district and the Regional Plan should address the importance of stormwater quantity as well as quality to this environment. There may also be opportunity to capitalise on this feature as a tourist destination.

1.7 Goal 4: Support Robust Regional Communities

- a) To ensure that the directions and actions are clear, amend Direction 4.3 to acknowledge both hazards of natural and human origin.
- b) Consider the development of regional benchmarks for hazard data that could be adopted and applied by all Councils in the region.

Direction 4.3 is "*Build the region's resilience to natural hazards*"; however, it also includes references to hazards of human origin, ie. mine subsidence. The wording of the direction should be amended to reflect that it encompasses hazards of both human and natural origin.

The draft Regional Plan seeks to "*investigate opportunities to improve the quality and consistency of hazard data in the region*"; however, it is unlikely that the proposed commitments will achieve this. It might be more valuable to develop regional benchmarks for hazard data that could be adopted (and consistently applied) by all Councils in the region.

2. Draft Plan for Growing Hunter City

2.1 Direction 1.1: Grow and Diversify Centres Across the City

- a) To provide clarity and certainty to the community, clearly define the role and function of each strategic centre.
- b) That the Implementation and Monitoring Committee recommend the development of a strongly integrated public transport network and that each component be reviewed regularly starting with a review of bus services.

The draft Plan identifies nine (9) strategic centres and two (2) global transport gateways; however, it does not identify a hierarchy of centres or provide guidance on the role of each centre. Some of the identified strategic centres have significant constraints, such as Broadmeadow which is constrained by flooding. The lack of guidance on the role and functions of each centre is likely to result in increased development expectations and conflict. The role and function of each strategic centre should be clarified in the Regional Plan to ensure certainty for all stakeholders.

Action 1.1.1 refers to improving public transport, but does not provide any firm commitments. Several previous reports commissioned by the State Government have recommended increased frequency on several key routes. Increased frequency on key routes and their promotion could effect change in mode share. There is a clear need to integrate public transport across the region including a review of bus services to facilitate this needed integration.

2.2 Direction 1.2: Provide a Greater Mix of Housing Types to Meet Changing Demand

- a) Specific and measurable actions/commitments in relation to the delivery of infrastructure and the coordination of services should be included in the Regional Plan.
- b) Proximity / ease of connection with existing transport infrastructure should be added to the criteria for assessment of new release areas.

Direction 1.2 indicates that new housing will be accompanied by the delivery of infrastructure to support communities. However, there are no actions to address the delivery of infrastructure or in relation to the coordination of service delivery such as schools, hospitals, and emergency services. Although a Coordination and Monitoring Committee is proposed which may include agencies that manage infrastructure and services, it will be difficult to plan and monitor the success of the Regional Plan in addressing this issue unless specific actions and commitments are included.

Action 1.2.2 details criteria for the assessment of new land release areas. It is suggested that the criteria be expanded to include 'proximity / ease of connection with existing transport infrastructure' in addition to cost of new infrastructure.

2.3 Direction 1.3: Enhance City-Wide Transport

- a) Consideration be given to improved public transport to all employment lands as well as between strategic centres, transport gateways, key destinations and open space. The proposed Newcastle light rail system could be extended to connect these strategic locations including to the Newcastle Airport, John Hunter Hospital, Hunter Stadium and Glendale Interchange. It will be important for the Regional Plan to identify the necessary corridors to provide these links.
- b) Action 1.3.1 should be amended to acknowledge that public transport is primarily a state government responsibility and that councils would welcome consultation on improving public transport. The establishment of a Hunter Regional Transport Authority is supported.
- c) Similar to Action 2.3.2 within the Draft Hunter Regional Plan, Action 1.3.1 should be amended to recognise and protect key transport and freight corridors in consultation with Councils, including the Lower Hunter freight corridor and corridor for high speed rail.

The draft Regional Plan has a strong focus on roads. Access to public transport is a significant issue for the Hunter and the ageing population and the trend away from younger people obtaining a driver's license means good access to public transport will become more important in the future.

Industrial employment lands are currently poorly served by public transport and transport plans need to ensure access between centres and other employment lands. For example, Beresfield has similar employment figures to Charlestown, but has limited public transport options.

Inner Newcastle has great potential for mode substitution, but a coordinated approach is needed, with provision for incentives (eg. frequent, reliable public transport services) and disincentives (parking costs).

Action 1.3.1 suggests that the NSW Government will work with councils to progress transport plans; however, public transport is primarily a state government responsibility. Councils have little involvement in bus planning and virtually none in rail. This is something that NSW government can and should progress, though consultation with Council is welcome.

Identification and protection of freight corridors, particularly the Lower Hunter freight corridor, should be recognised within both the Draft Hunter Regional Plan and the Draft Plan for Growing Hunter City.

Opportunities for the construction of a high speed rail line to connect Newcastle to Sydney should be acknowledged within the Draft Plan for Growing Hunter City. Fast rail would provide significant opportunities to grow the Hunter region.

2.4 Direction 1.4: The City's Blue and Green Network

- a) The various types of open space should be clearly identified in the Regional Plan to ensure that appropriate planning is undertaken to provide sufficient green space that is useable and fit for purpose.
- b) The delivery of a green grid plan for Hunter City is important to address the gaps in parkland provision within existing communities in addition to new release area and opportunities for connections between open spaces.

Council supports the objective to identify new open space in land release areas together with connecting existing open space. However, for the plan to be effective, the specific types of open space need to be identified. The word 'open space' incorporates a wide variety of green spaces, including; parks, sportsgrounds, bushland, drainage reserves, road reserves, utility easements, wetlands and conservation areas. The plans supports that *"an overwhelming majority of residents live within 800 metres or a 10-minute walk of a 'green space' which are highly valued by the City's residents and visitors"*. Whilst valuable, the mapping project referenced within the draft plan does not distinguish between the types of 'green space' or whether the spaces are useable / fit for purpose spaces.

Research undertaken during the development of the Newcastle City Council's Parkland and Recreation Strategy identified:

- i) Whilst there are a large amount of 'green spaces' or 'open spaces' within the Newcastle LGA, the number of fit for purpose parks accessible in close proximity to the community is limited.
- ii) There are a large number of parks performing drainage roles with recreation functions a secondary benefit. Many parks border wetlands, creeks, stormwater channels, overland flow paths and riparian zones. While a number of these parcels are not designated 'drainage reserves', they are affected by stormwater and perform important overland flow functions.
- iii) The quality, functionality and usability of local parks are affected by a number of constraints including topography, gradient, flooding, access, size, dimensions and street frontage. Fit for purpose and constraints free spaces are limited primarily to district standards parks.
- iv) Only approximately half of all Newcastle City Council LGA residents are located within 500m of parkland 0.5ha or greater in size. A number of factors such as gradient, the presence of railway lines, major roads, and lack of crossing points, creeks and stormwater channels provide additional barriers to parkland access. While residents may be within a 500m radial distance to parkland, the presence of these barriers significantly increases distance and the 'real' location from parkland. Improved pedestrian and cycling connections to existing open space opportunities will also be an important strategy in overcoming access barriers.
- v) The standard distance of 500m is widely accepted as a 'walkable' distance for most residents from their home to a local park. This is reinforced in a number of studies of best practice that analyse walking distance and access to local destinations within communities. Many transport strategies also refer to walking distances of no more than 500m. Further, it is noted that the United Nations set an Environmental Accord in relation to Green Cities that included the objective: *"Ensure that there is an accessible public park or recreational open space within 500m of every city resident by 2015"*.
- vi) The size of local parkland within the Newcastle City Council LGA is generally small. The recommended size of local parkland is 0.5h - 2.0ha. This provides sufficient space for a range of recreational activities such as playgrounds, escape and relaxation, ball play and picnics. 25% of all parks are less than 0.2 ha in size whilst 53% per cent of all parks are less than 0.5 ha.

2.5 Direction 1.5: Grow and Manage Industrial Activity in the City

- a) That the draft Regional Plan includes a map which identifies all existing and proposed industrial land within 'Hunter City'.

Council supports the initiative to monitor the size, location and capacity of industrial land across 'Hunter City' to ensure industrial land has the capacity to meet employment needs in suitable locations. In this regard, Council notes that the Jemena site in Hamilton South will add a significant supply of industrial land to the city, once it is rehabilitated / remediated.

2.6 Direction 1.6: Coordinate Infrastructure to Support Growth

- a) Clear guidelines should be developed to ensure land is not rezoned out of sequence or targeted for growth in the absence of an infrastructure delivery plan.

Council supports the monitoring of development activity to support infrastructure planning and the re-establishment of an Urban Development Program. Clear guidelines are needed to link growth and infrastructure delivery so that land is not rezoned out of sequence or targeted for growth in the absence of an infrastructure plan.

2.7 Inner Newcastle District

- a) Amend Action 2.1.1 to acknowledge the Newcastle Urban Renewal Strategy and the planning framework that it established for the city centre.
- b) Amend Action 2.1.2 to acknowledge the flooding and environmental constraints which will influence opportunities for development around Warabrook rail station.
- c) Amend Action 2.1.3 to acknowledge the flooding constraints which will limit opportunities for residential development in Broadmeadow.
- d) To ensure appropriate consideration is given to flooding constraints, include flood maps similar to that shown for the Maitland area.

Action 2.1.1 is to "*Deliver the long term aspirations and vision for Newcastle City Centre*" and refers to establishing planning controls to achieve the long term vision for the city centre. However the Newcastle Urban Renewal Strategy (NURS) and associated amendments to local planning controls have already established this.

Council supports Action 2.1.2 to "*Diversify employment activities at the university and hospital campuses and enhance their connectivity to the region*", however, has some concerns with suggested development of Warabrook rail station and its surrounds, including for commercial development. This area is constrained by flooding and proximity to wetlands mapped under State Environmental Planning Policy 14 - Coastal Wetlands. These constraints should be acknowledged as they may limit the ability to develop this area.

Council has concerns with the identification of Broadmeadow as a strategic centre without any guidance on the hierarchy and role of each centre or the acknowledgment of environmental constraints. Action 2.1.3 to "*Support the development of the Broadmeadow precinct as a preferred place to live, work and play*" raises expectations for housing growth in this area. However, increasing the population living in this area is constrained by flooding.

2.8 Inner West District

- a) Include an action to investigate the establishment of new local centres in the western corridor.

Council acknowledges the importance of supporting existing centres although notes that there may be a need for new centres within the western growth area to support new communities. An action to ensure new growth areas within the western corridor are supported by new centres may be of value. These will need to be appropriately located so as to not undermine existing centres and account for constraints such as flooding.

2.9 Maitland-New England Highway Corridor District

- a) Direction 6.1 should be relocated to the section 'Managing growth and change in Hunter City' as this pinch point affects the whole of 'Hunter City'.

Council supports Direction 6.1 which aims to address the pinch point in the habitat corridor and transport network. As this 'pinch point' affects the whole of 'Hunter City' and not just the Maitland-New England Highway Corridor district, it should be addressed in the section 'Managing growth and change in Hunter City'. In addition, the corridors should be identified and management actions should be included in the plan.

There is currently a large parcel of land (343 acres) for sale within the pinch point area (Black Hill), which is immediately adjacent to National Parks and Wildlife Services land and Council requests the NSW Government investigate acquiring this land as an offset for the proposed M1 Pacific Motorway Extension to Raymond Terrace.

2.10 Other Matters - Heritage

- a) Include a specific direction and action to identify, protect and manage items and areas of heritage significance across the Hunter region.

The draft Regional Plan does not adequately address Aboriginal or European heritage across the region. The Newcastle community has consistently identified the protection of heritage as an important issue. The Regional Plan should include a specific direction and actions to ensure that appropriate consideration is given to the protection and maintenance of heritage in the Hunter region.

Council resolved on 8 December 2015 to provide In-Principle support for the inclusion of the Coal River Precinct on the National Heritage List (NHL). It has also committed funds towards a project to prepare a heritage master plan that presents the Coal River Precinct in a way that aligns with related Council activities including the City Centre Revitalisation Program, the Aboriginal Heritage Management Plan, the review of the Destination Management Plan, the Bathers Way program and the Walking Trails project. This is an important area for Newcastle and the Hunter Region and the Hunter Regional Plan and Plan for Growing Hunter City should reference this Coal River Precinct in a specific direction and action relating to identifying, protecting and managing items and areas of significance across the Hunter.