

24 March 2016

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### **Planning Institute Australia – Submission on the Draft Hunter Regional Plan and the Draft Plan for Growing Hunter City**

The Planning Institute of Australia (PIA) is pleased to have the opportunity to lodge this submission in response to the public exhibition of the NSW Department of Planning and Environment's (DP&E) Draft Hunter Regional Plan and Draft Plan for Growing Hunter City. This submission has been prepared by Members of the Hunter Branch of the Planning Institute of Australia NSW Division (PIA NSW).

The Planning Institute of Australia (PIA) is the peak body representing professionals involved in planning Australian cities, towns and regions. The Institute has around 5000 members nationally and around 1200 members in New South Wales. PIA NSW plays key roles in promoting and supporting the planning profession within NSW and advocating at all levels in relation to key planning and public policy issues.

## **Executive Summary**

This is the first regional land use plan for the Hunter since the release of the Lower Hunter Regional Strategy (LHRS) in 2006 and the first ever to incorporate both the Lower and Upper Hunter regions and is long overdue.

PIA strongly supports the need for an updated regional plan for the Hunter and moreover supports the companion document namely the Draft Plan for Growing Hunter City. Notwithstanding, PIA believes that there are a number of areas where the plan can be strengthened and we remain confident that the Department of Planning and Environment (DP&E) can capitalise on these opportunities for improvement and deliver a stronger and more robust regional plan that will effectively chart the growth and development of the Hunter over the next 20 years.

The key themes that PIA believes would benefit from further work are detailed in the following pages.

## The Vision

Good strategic plans need to clearly set out the vision for an area and shape the objectives that follow. There should also be a clear connection from the Vision through to the mechanisms to drive the actions committed to achieve that vision. PIA believes the vision should be a simple statement that clearly defines where we are heading in the Hunter. The current vision is a long-winded statement that specifically references the Government's vision rather than the community's vision. PIA suggests a simple vision such as for the *Growing Sydney* plan "*Sydney will be a strong global city, a great place to live*"; a simple statement that everyone can understand. The absence of references to the challenges of transitioning the Region and its urban areas to a low carbon economy over the coming decades should be addressed.

## Governance

PIA considers that identifying an appropriate governance structure that will be implemented is one of the key issues for this plan. The Hunter has experienced ten years of inaction from the State Government on the LHRS. The LHRS identified that it would be updated annually by an Urban Development Program however this has never been done. This does not provide the confidence and credibility required that any co-ordination and monitoring committee nominated in the regional plan will be effective or committed to for the life of the Plan.

PIA supports the inclusion of the reference to delivering the Plan and the proposal for establishing the Hunter Regional Plan Co-ordination and Monitoring Committee (together with the proposed composition of that Committee). However, the detail on delivering the plan does not go far enough and should be expanded. The role of the Hunter Regional Plan Co-ordination and Monitoring Committee should be defined in terms of responsibilities for implementation, monitoring and review.

In addition, it should be clearly stated how this Committee will influence decision making to see the Plan delivered and remain relevant and effective.

## Infrastructure

The Plan in its current state does not include an integrated infrastructure plan that defines how infrastructure will be delivered. PIA considers this a key flaw in the draft Plan and something that would add significant value to the final Plan. The inclusion of an infrastructure plan to complement the regional land use plan would be a vehicle to identify key infrastructure priorities, both current and proposed and also serve to guide future land releases. The current plan notes that there is enough land zoned for the expected future population growth, however the delivery of infrastructure to unlock this land and specifically the sequencing of infrastructure provision is vital and well overdue. Coupled with this is the need for an integrated transport plan that identifies key priorities and includes all modes of transport including public transport, active transport, freight and commercial transport.

## Detailed submission

### Governance

As outlined above, PIA supports the inclusion of a reference to delivering the Plan and the proposal for establishing the Hunter Regional Plan Co-ordination and Monitoring Committee (the Committee). However, the discussion on delivering the Plan does not go far enough.

There needs to be fewer generalisations and more detail on the actions, in order to enhance clarity. The draft Plan would benefit from more precise actions that establish what should be done, by whom, by when, and how they will be monitored and reported.

PIA understands the process that is involved in achieving the cohesion and leadership of State Government agencies to deliver such a regional plan. PIA strongly supports the Minister for Planning and the Department of Planning & Environment to take on this leadership role.

Monitoring and particularly review are crucial roles that the Committee will need to perform given the dynamic social, economic, environmental and technological context in which the 20 year plan will be implemented. For example it is predicted that a number of current jobs could be replaced by robotics within the next 20 years. Additionally this monitoring will allow for the projected population to be reviewed as required to ensure the Plan maintains currency.

Any Committee charged with monitoring the implementation of the Plan needs strong leadership with objectives and key performance indicators that at the end of each year can relate performance back to demonstrable achievement of the vision, the four goals and the directions contained in the Plan. As with any professionally operating Board there should be elements of independent auditing of such performance as part of annual review.

The Draft Hunter Regional Plan should at a minimum go to the extent of the Illawarra Shoalhaven Regional Plan which in Appendix 2 summarises the actions and is more precise around relating direction, actions, lead agency (IES), key stakeholder (S) and timing. It is noted that even this implementation framework falls short of international best practice, such as practiced in parts of the United States.

PIA believes that the Government should nominate a dedicated Minister for the Hunter to provide leadership and ensure the appropriate level of commitment to the Hunter within Government.

Currently the proposed composition of the Committee includes 11 Councils, six State agencies and potentially supporting groups with the Chair being the NSW Department of Planning & Environment (the current 11 Councils that would be on the committee will reduce to nine if the Local Government Reform agenda is implemented with the amalgamations of Newcastle and Port Stephens Councils and Dungog Shire and Gloucester Shire Councils). Nevertheless even with nine Councils, it means a minimum

of 17 members of this committee with the potential for parochial behaviours, rather than the more impartial, broader sub-regional perspectives that need to be taken. The four "landscape sub-regions" nominated in the Draft Regional Plan do provide some potential basis for commissioner representation to provide that overview and impartiality needed for cohesive implementation. This has been the approach adopted by the State Government in establishing the Greater Sydney Commission.

Accordingly PIA recommends that the composition of the Committee be reviewed in light of the above comments. PIA welcomes the opportunity for dialogue with the Department of Planning & Environment regarding the approach to implementation and governance of the Hunter Regional Plan.

### **Infrastructure Planning**

PIA notes that there is not a lot of detail relating to the specific infrastructure required throughout the Hunter although it is acknowledged that some further detail is provided in the Draft Plan for Growing Hunter City. Whilst more specific comments are provided below, PIA recommends that the DP&E incorporate more specific actions with relation to the provision of infrastructure that will enable the goals and directions to be achieved. Further there is no allocation of funding identified or a process for how future funding will be achieved and prioritised by the State. Greater confidence could be achieved if a funding mechanism was identified and put in place.

PIA supports the direction for the need to enhance inter-regional transport connections and the identification of the global transport gateways, being the Port of Newcastle and the Newcastle Airport. Further PIA supports the recognition of the importance of the freight network within the Hunter. There is mention in the Draft Plan of specific large-scale road infrastructure projects such as the M1 to Raymond Terrace, the Newcastle Inner City Bypass and the freight rail project. The Plan then refers to an alternate process being undertaken by Transport for NSW regarding their regional corridor planning process. The Hunter Regional Plan should describe how the directions and actions would be integrated in the Transport for NSW corridor planning process. Further, other major infrastructure projects such as the Glendale interchange are omitted from the plan.

PIA supports and agrees that substantial opportunity exists for the Hunter from the Port of Newcastle. PIA supports the idea of encouraging cruise ships to berth in the Port to complement the existing uses of coal and agriculture and other potential future uses such as a container terminal. PIA recommends that some aspirational targets be included in the Plan, such as an increase in quantity of non-bulk freight, such as containers and the number of cruise ships to a nominated frequency and that the Plan identifies a clear link to the provision of the infrastructure upgrades that are necessary to provide for this increase.

PIA is aware that the Australian Rail Track Corporation is currently in the planning stage of the Melbourne to Brisbane Inland Rail (MBIR) project, one of the largest current infrastructure projects in Australia. While the Growing Hunter City Plan includes a reference to investigation of high speed rail between Melbourne and Brisbane, there is no



reference to the MBIR. PIA strongly recommends the inclusion of an action to ensure that the opportunities for the Hunter and the connection to the MBIR can be realised.

PIA supports the action for integration of land use and transport planning identified in the Draft Plan for Growing Hunter City. Further we note that the Government will 'align the progress of transport plans for the Hunter City'. PIA notes that this can often be challenging when working with different Councils. PIA would like to see indicative timelines for alignment and delivery of these transport plans within the Regional Plan.

Further clarification is required on how infrastructure delivery will be prioritised. PIA supports the importance of the Inner West and Maitland–New England Corridors as that is where the bulk of new release land supply is; however some clarity on how future infrastructure planning can be prioritised outside of this corridor would be beneficial given that significant growth will also occur elsewhere in the Region. Therefore, it would be advantageous to set criteria for all significant urban growth areas, including outside of the Inner West and Maitland–New England Corridors.

PIA questions why the consideration of Special Infrastructure Contributions would be limited to the Inner West and Maitland–New England Corridors. Why not apply such contributions to relevant projects within the area covered by the Hunter Plan and Hunter City Plan?

PIA supports Direction 5.1 and the associated action as outlined in the Draft Plan for Growing Hunter City. PIA believes that this is critical to success of the Plan and recommends that it should be strengthened with confirmation of funding and also including a timeframe for completion. PIA is aware that some of these new release areas have or are currently seeking staged development consents. To ensure this direction and these actions are achieved this sub plan needs to be completed as soon as possible. It is clear that a well-coordinated urban growth strategy linked to infrastructure provision is needed.

PIA believes that further emphasis should be placed on enhancing and identifying the strategic vision for telecommunications. The reliance of communities and businesses on telecommunication infrastructure is ever increasing with recent examples of businesses in smaller villages unable to trade if services are not operational.

The need to manage existing and future infrastructure to be more resilient to natural hazards is supported. PIA suggests the inclusion of some conceptual targets / criteria within the Plan to assist in this regard.

### **Implementation of the Plan**

The generality of the maps, actions and commitments in the Draft Plan does not provide clear guidance on how the Plan will be implemented or funded to achieve the goals. Actions and commitments must be specific, measurable and have an appropriate time frame for implementation. Specific, measurable actions will ensure that progress in achieving the goals can be monitored and reported upon. Specific and measurable

actions will also allow the allocation of appropriate funds to ensure that the goals can be achieved.

Each 'Action' within the Draft Plan identifies the NSW Government's commitments to achieve the actions and directions in the Draft Plan. Many of the actions include a statement that the NSW Government "will work with" local Councils to deliver the action. However, the Draft Plan does not provide any specific detail on how the NSW Government will work with Councils to achieve the actions or how these will be funded.

It is also noted that some of the listed commitments have already been undertaken. For example, Action 2.1.1 of the Draft Plan for Growing Hunter City indicates that *"the NSW Government will work with Newcastle City Council, the private sector and local communities to maintain the long term vision and strategies for growth in the city centre, and establish planning controls that create the right conditions for this to occur"*. However the Newcastle Urban Renewal Strategy (NURS) and associated amendments to local planning controls have already established this. This should be acknowledged and commitments should reflect how these existing commitments can be implemented.

Actions also need to be clear and concise to ensure that all users of the Regional Plan have a clear understanding of the commitment that is to be undertaken. For example, in the wording in Action 3.1.1 it is not clear 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.

It is also important that the commitments proposed within each action are appropriate to the action. For example, Action 1.3.1 in the Draft Plan for Growing Hunter City 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.

### **The Evidence Base**

There has been much recent rhetoric and policy emphasis on the need for evidence-based planning. This refers to planning decisions that can be shown to have been informed by substantial data and an understanding of relevant elements. For example, *A New Planning System for NSW Green Paper* (July, 2012) proposed that 'all levels of strategic plans – regional, subregional and local – will now have common elements including: ...a strong evidence base and understanding of financial feasibility'. However, the current plan displays a lack of transparency in the way many of the strategies and other recommendations in the plan have been formulated, and poor supporting evidence in terms of both accuracy and the currency of the data.

Areas where there appears to be a critical shortage of evidence include locations identified as having 'high environmental values' (where it is understood Councils have been asked for input that was not concluded in time) and the current housing market environment (it is understood that the Plan has been based on outdated information which has not considered more recent trends such as the effect that the decline in mining has had on sharply falling housing demand in the Upper Hunter). There are other aspects

that are not covered in a meaningful way, such as how the plan will protect scenic values, which are mentioned in the very first sentence: 'The Hunter region has a rich and diverse natural environment, scenic landscapes, extensive resources...' However, the Plan provides virtually no information on where these scenic landscapes are and how these will be protected.

### **Protect and Connect Natural Environments**

PIA supports the Plan's intention to protect and connect the natural environments within the Hunter. There are a number of known land use conflicts in the Hunter that directly impact on the natural landscape including mining, agriculture, viticulture and urban development. Given the level of historical activity in the Hunter Valley, remaining vegetation is typically of high environmental value. This will pose challenges for the State Government in achieving the appropriate balance between facilitating developments that generate employment and protecting the natural environment. As noted in the Draft Plan, many areas currently identified for growth contain high environmental values.

PIA supports the concept of identifying impacts at an early stage at a regional scale rather than at the development assessment stage and supports the implementation of strategic impact assessments in specific areas such as the Maitland–New England corridor. Further, any offsetting requirements should be focussed on the current offset policy settings and not duplicate requirements of other levels of government.

The need to ensure that mapping and information is updated is critical. PIA believes that this should be incorporated into Regional Plan reviews. There are a number of existing policies, Acts of Parliament, Regulations and guidelines that currently comprise the biodiversity requirements of the NSW Government. Given the existing complex legislative framework PIA would caution against the introduction of additional regulatory processes, but rather provide a clear pathway.

The Hunter boasts beautiful and iconic beaches and an outstanding coastline. Many industries rely on our coast, including the coal industry (the port is one of the largest coal export ports in the world) and tourism. PIA believes that not enough resources are directed towards the management of the coastal zone, particularly given the likely impact of climate change. PIA would strongly recommend that during the finalisation of the Plan the outcomes of the current review into coastal legislation being undertaken by the NSW Government be incorporated into the Plan.

### **City Centre Hierarchy**

It is commendable that the draft Hunter Regional Plan and companion document, the draft Plan for Growing Hunter City, adopts a metropolitan approach to the planning for Hunter City concept. The success of the Hunter City concept and its network of centres are inextricably linked. The Hunter Region as a whole is characterised by an existing hierarchy of centres, centred on Newcastle City Centre. This hierarchy is identified in various regional (LHRS) and local government planning strategies. Therefore, if the metropolitan strategy is to grow and sustainably manage the centres in the Hunter City concept, as well as enhance the productivity and economic development potential of the

broader Hunter Region, it must not undermine the established (and planned) centre hierarchy.

Whilst strategic planning for these centres has often occurred independently based on each local government area as identified by the LHRS, there are a series of natural sub-regions based on labour markets, housing markets and transport infrastructure corridors. Major Regional Centres, such as Maitland, Cessnock and Charlestown, act as the 'hearts' of these sub-regions and can attract economic opportunities by providing sufficient localised economic density and high levels of accessibility to their respective catchments. Specialised Centres, such as the University of Newcastle and John Hunter Hospital, focus on regionally significant economic or institutional activities that generate many work and visitor trips, which therefore require a high level of transport accessibility. Town centres, a network of smaller neighbourhood centres and villages, and a number of privately owned, stand alone shopping centres, all complement the established centre hierarchy. Each of these centres is provided with clear strategic guidance regarding the role and function of each within the established hierarchy of centres under the auspices of the LHRS.

With the exception of Newcastle City Centre, the draft plan differs markedly from the LHRS by removing reference to the established framework of centres and by providing limited strategic guidance on the role of each centre. This exclusion significantly reduces the level of strategic guidance that should be provided by the draft plan, and could result in development proposals and long term infrastructure and capital investment programs by both government and the private sector that undermine the established and planned centre hierarchy. Competition for capital investment is fierce and, without proper guidance in the Regional Plan, PIA is concerned that investment decisions arising from the draft Regional Plan could result in a disorderly centre hierarchy that does not ultimately benefit the Hunter community.

The draft plan relegates Cessnock (identified by the LHRS as a Major Regional Centre) and Morisset (identified by the LHRS as an Emerging Major Regional Centre) to the town centre level in the proposed centre hierarchy. PIA considers that this approach within the draft plan does not recognise the strategic importance of these two centres within the context of the overall centre hierarchy established for the Hunter Region and does not respond to the key drivers for growth within these areas and could diminish the prospects for further capital and infrastructure investment. Further, the classification of standalone shopping centres, such as Green Hills, at the same level within the proposed centre hierarchy as major regional centres such as Maitland and Raymond Terrace, do not send clear and coherent messages to the Hunter community, developers and local and state government agencies regarding the preferred types of uses within each centre.

To address this, it is recommended that a framework is developed within the Draft Plan that identifies a clear centre hierarchy for the Hunter Region and describes the role and function of each centre nominated within the Draft Plan. Whilst it is acknowledged that the current LHRS has not benefitted the Hunter Region through the years of inaction, it does nonetheless provide a clear centre hierarchy and framework for investment and capital expenditure decisions and should somehow be reflected in the Plan.



## Housing / Land Supply

The Draft Plan for Growing Hunter City identifies approximately 60,000 more dwellings will be needed between 2016 and 2036 in Hunter City to support expected population growth. The Department of Planning and Environment's population and dwelling projections identify that this number is likely to be approximately 70,000 new dwellings across the entire Hunter Region. The Plans identify that land already zoned for residential development has the capacity to deliver around 42,400 lots with the remainder of the demand to be taken up by infill development, and thus there is already sufficient land supply to cater for the project demand in new dwellings.

Unfortunately, there is a large discrepancy between what land is actually zoned and what is delivered on the ground. A review by the UDIA identified a significant discord between the number of lots proposed in the previous Lower Hunter Regional Strategy (2006) and that actually delivered. The Lower Hunter Regional Strategy (LHRS) of 2006 identified the need for approximately 115,000 dwellings between 2006 and 2031 (approximately 4,600 dwellings per annum). In March 2013 the then Department of Planning and Infrastructure (DP&I) released *The Lower Hunter over the Next 20 Years: A Discussion Paper*. The Discussion Paper reported that around 2,200 dwellings per year had been constructed in the Lower Hunter, but was below the underlying demand of around 2,500 to 3,000 dwellings per year (DP&I, 2013). Australian Bureau of Statistics (ABS) Census data for 2006 and 2011 indicates an actual average annual growth of 2,483 dwellings per year (1.16% annually). In sum, even the Department's own figures have identified a shortfall in actual dwelling construction compared to population growth identified in the previous strategies.

PIA therefore recommends and supports the establishment of an Urban Development Program (UDP) or something similar to monitor development and actual dwelling construction in the Hunter and to continue to monitor progress in achieving a balance between population / household growth and dwelling construction.

Secondly, PIA also identifies that the Plans for the Hunter need to include provisions or guidance in bringing new residential rezoning proposals to fruition. Comments in the Draft Plan for Growing Hunter City that rezoned land plus infill development can 'deliver' the estimated growth in the Hunter are unrealistic. There are many examples in the Hunter and North Coast where land has been rezoned for residential development but no dwellings have been constructed due to other issues (e.g. infrastructure provisioning, biodiversity, mine subsidence). The Plans for the Hunter cannot rely solely on land being rezoned to ensure dwelling construction. The Hunter Region Plan needs to ensure that the processes are in place to ensure additional residential land can be rezoned to provide sufficient supply to match demand.

In regards to higher density forms of development and infill development, there are numerous town centres in the Hunter Region that can accommodate this. The Draft Plans appear to be predominantly focused on Newcastle City Centre. While PIA supports the revitalisation of Newcastle City Centre, there are opportunities outside of the Centre that can accommodate infill development, including areas around train stations (e.g. Hamilton)

and close to specialised centres (e.g. University of Newcastle Callaghan Campus). PIA recommends that the Plans, specifically the Hunter City Plan, should encourage the revitalisation of Newcastle City Centre, but also encourages Councils to examine all town centres in their area for redevelopment opportunities. This latter point is also related to the ability of people to downsize / age in place.

The Institute welcomes ongoing engagement on the Hunter Plans and is happy to elaborate on any of the matters covered in this submission.

Yours Sincerely



Marjorie Ferguson MPIA CPP  
**NSW President**