



Date 22<sup>nd</sup> March 2016  
To

## **SUBMISSION**

### **DRAFT HUNTER REGIONAL PLAN**

The draft appears very general in its proposed approach to virtually all the key planning issues, often citing broad State or national level plans or policies as the basis for the Regional plan. It does not take the next step of clearly articulating the implications of these generic statements for particular localities within the Hunter.

There is a serious risk that the high level major growth objectives of the Plan, without specific forecasts or targets for sub-areas, will be used by developers and pro-development Councils as justification for further greenfield developments throughout the Hunter which cumulatively could far exceed the overall need.

The Plan needs to accommodate realistic growth projections while at the same time allocating them appropriately to sub-areas i.e. providing both a 'floor' and a 'ceiling' for further development, particularly in areas of high environmental value which need protection from over-development.

Despite frequent use of the word 'sustainable', the Draft Plan does not demonstrate how it fulfills the principle of Ecologically Sustainable Development (ESD) which is a fundamental objective of the Planning System, as expressed in the Environmental Planning and Assessment Act 1979 (Section 5(a)(vi)). There is no recognition that environmental and social objectives may impose limits on acceptable



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population and economic growth for the Region, and their consequent land-use demands and impact on natural resources.

The Draft Plan contains little detail on how it is proposed to be implemented in an integrated way. What government bodies or privatized infrastructure providers are expected to make the detailed plans and policies? It will be too easy for separate decisions to be made on such matters as road and other transport infrastructure, water supply waste management etc.

## **GOAL 1: GROW AUSTRALIA'S NEXT MAJOR CITY and associated draft Plan for Growing Hunter City**

The area defined as 'Hunter City' appears arbitrary- we would have expected a more detailed rationale for its boundaries, perhaps based on statistics for 'journey to work' or other interactions.

The proposed future role of "Hunter City" could also have been defined in more detail. For example, should it be the site of State/ Commonwealth Regional administrations? What its role as a cultural hub - galleries/museums/ theatre/ specialist education/ sporting events/media etc?

There is no discussion of governance and no linkage to the Government's proposed Council merger proposals. We might have expected proposals for a Hunter City to be matched by a proposal for a metropolitan LGA with similar boundaries.



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This would however have left the eastern part of Port Stephens (outside Hunter City) effectively cut off from other regional/rural areas.

The draft Regional Plan includes a concept of the ‘Hunter City’s Hinterland (Figure 2 Landscape Sub regions) but this concept is ill defined and the proposed boundaries imprecise. It is not clear for instance how much, if any, of the Tilligerry and Tomaree peninsulas is included in the hinterland. We understand that the Department sees the hinterland as an area of potential land-use conflicts, but this is not clearly articulated in the Draft Plan.

We have a particular interest in how the Hunter City proposal would affect the Tomaree and Tilligerry peninsulas, and the implementation of the wider Hunter Regional Plan in this ‘remnant’ fringe area. While the peninsulas are included in the Hunter’s North-East Coast sub-region they would not have even a single road link with the rest of that sub-region (effectively the Great Lakes LGA) that does not pass through Hunter City.

There will be not unreasonable fears that the needs of the Tomaree and Tilligerry areas may be neglected by those involved in developing and implementing the plans both for Hunter City and for the Hunter’s North-East Coast sub-region. How does the overall plan intend to ensure that these fears are not realized?

We note the references to Nelson Bay in the one page of the Draft Plan devoted to the NE Coast sub-region, including this: ‘facilitating urban infill and higher residential densities in Nelson Bay and Forster–Tuncurry’ (p.84). If mandated by the Minister in a final plan, this could have very significant implications for the future of Nelson Bay, the low-rise character of which is currently protected in the Port



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Stephens LEP. We look for more detailed justification for this objective in the context of the overall regional population growth, and the apparently contradictory assurances about protecting the natural environment of the NE Coast.

## **GOAL 2: GROWING THE LARGEST REGIONAL ECONOMY IN AUSTRALIA**

The draft plan gives no real indication on how the expected growth in jobs is to be achieved.

There appears to be an emphasis on the growth of coal mining and it being the priority within the Hunter. This may have been applicable in the last decade but although coal will still be a part of the regional economy for a while, it is in serious decline. Since this document was written there have been several coal mines closed in the Hunter with several hundred people now out of work in the mining and supporting industries. It is predicted that at least another thousand workers will lose their jobs in 2016.

The emphasis would have been better given to alternative industries like the renewable energy sector, and other industries including saving the ship building in Newcastle. This would show that a transition from coal could drive the economy forward.

We might reasonably have expected some attempt to identify potential growth industries and their location and infrastructure needs. The potential for employment in



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industrial, and agricultural growth around the airport could be included and expanded. In primary Industry there could be potential for very intense food and other cropping as is emerging with the large-scale Tomago glasshouse. There are locational advantages being close to the Sydney market and Newcastle Airport. The recent experience of the private airport at Toowoomba is a lead. This has opened up a major export market to Asia for horticulture and other food products. The Hunter river floodplain once supported much more intensive horticulture -

We now only use Bolwarra flats for turf cultivation!!! There are many other rich agricultural areas in the Hunter, which are now used far less intensively that they could be. Prime agricultural lands should be noted and protected.

The future direction and infrastructure needs for the wine industry deserve more attention in the plan. What is its scale and economic importance and where is it headed?

Given the significance of tourism to the Hunter economy the draft plan seems surprisingly light on any future direction for the tourist industry, and gives no mention to the effects a growing population might have on this important industry. With the seasonal nature of tourism, plans need to be implemented for infrastructure to support this; Accommodation, car parking, decent public facilities (toilets, shower and change rooms) picnic areas, shopping, roads and public transport to mention a few.

What future sites are available, or should be reserved for major tourist ventures? In this regard the Tomaree and Stockton hospital sites could even have been mentioned. What are the key tourist markets China? India? Domestic?

There is no forecast or recommendation on the relative share among the transport modes. We would have expected more emphasis on the public interest in a



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modal shift towards public transport? What role is predicted/proposed for high-speed rail (within the outlook period, at least in terms of reserving a corridor)? Or light rail, beyond the token and still unclear proposal for Newcastle CBD? To the extent that private car use will remain a major mode in some areas, what are the options? (Car-pooling, Uber, park and ride etc). A growing urban sprawl will impacts on the tourism value of certain areas.

As in the existing (but outdated) Lower Hunter Regional Strategy, there is insufficient discussion of the role of tertiary education (TAFE and Universities) and the potential for business and employment opportunities to be linked to them.

## **GOAL 3:POPULATION AND HOUSING**

The draft plan provides for significant population growth, yet there is no preliminary discussion about whether this is either necessary or desirable in the context of ecologically sustainable development (ESD). There are many unanswered questions on the scale of population growth and how this fits with the objectives within an ESD, which we thought has been accepted as the basis of the planning system.

With the decline of coal and as yet no real direction on a transition to other alternatives the draft plan's regional housing and population projections need to be revisited.



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The draft plan does not seem to adequately address the very significant issue of affordable housing, including for the very large retired population in our area, and including the role of mobile/relocatable homes. The draft seems to encourage 'more of the same' except for a half- hearted plea for some increase in medium density.

There is no discussion of the ever present and contentious issue of high-rise development in strategic locations such as Newcastle CBD, Nelson Bay and Forster. What is the plan to resolve conflicts and try to reach a consensus on appropriate locations for high-rise, and on areas where low-rise character should be preserved?

The draft plan appears weak on provision of essential infrastructure to support development – particularly water and sewerage, but also electricity and gas supply.

While general reference is made to improved telecommunications, there is surprisingly little emphasis on the potential of the NBN to support home based or remotely located businesses catering to a national or even international market (Tomaree already has many such businesses).

## **GOAL 4: PROTECT AND CONNECT NATURAL ENVIRONMENTS**

Careful thought needs to be given to the effects of population growth on environmentally sensitive areas, dwindling agricultural land and tourism attractions. Already there are areas showing the signs of decline through over use and ever encroaching development.



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The relevance of Crown Lands and their future use does not get a mention. The role of National Parks is not mentioned nor is there discussion of the adequacy of their land allocation.

While the draft Plan identifies areas of high environmental value (Figure 11: High Environmental Values, p 46), it does not appear to provide adequate protection for those areas – **many of them also remain subject to mineral exploration licenses.**

Proposals for maintaining habitat connectivity appear to rely heavily on private sector initiatives, including mine re-habilitation. **These are not guaranteed** – and there may be a looming crisis in how to deal with mining voids (which may however also offer employment opportunities).

Although bio-diversity is mentioned there is no mention of ways to protect and support this, particularly at the regional level.

The draft Plan appears to rely heavily on biobanking and offsets. This policy appears to have many shortcomings – surely some areas are too precious to lose and where offsets cannot be an adequate substitute for protection, particularly where they are not ‘like for like’?

The draft Plan appears not to adequately address protection of **drinking water catchments**, either from mineral /gas exploration and extraction, or from development.





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**See ref Fig. 7 page 23 relating to gas exploration titles in contrast to Action 3.2.1 Page 57.**

We are surprised that the major issue of contamination from the Williamtown RAAF base does rate a mention.

The draft Plan fails to address seriously the implications of climate change, in terms both of necessary changes in the local economy (away from fossil fuels) and of adaptation, including the constraints on land uses due to the predicted rising sea level, and increased flood risk, where the precautionary principle should apply.

There is no mention of the marine environment, which is a vital part of the lower Hunter tourism economy. Already this area is under pressure and increased population and aquaculture use will only exacerbate this. The marine parks system needs to be kept **and policed**.

## **GOAL 5: SUPPORT ROBUST REGIONAL COMMUNITIES**

Local communities are increasingly demanding greater participation in strategic planning decisions – more and more decisions seem to be being taken out of the hands of democratically elected local Councils and given to unelected appointed bodies, or decided remotely by the State government.

The draft Plan proposes a Coordinating and Monitoring Committee (p.11) with



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representatives of local councils. There will be understandable fears that this is a relatively weak governance mechanism leaving a major 'democratic deficit'. To the extent that Councils will be represented on this Committee, mechanisms need to ensure that the representatives reflect the diversity of views in each Council – not just the policies of any particular faction which may be in control at a particular point in time.

Please acknowledge receipt of this submission

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