

27 February 2018

NSW Department of Planning
PO Box 1226
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RE: DRAFT GREATER NEWCASTLE METROPOLITAN PLAN

Thank you for the opportunity to prepare a submission to the Draft Greater Newcastle Metropolitan Plan (GNMP).

The GNMP sets out strategies and actions to drive sustainable growth in the five councils of the Lower Hunter. There are a number of positives arising from the GNMP, including its visions and actions for promoting tourism, Aboriginal cultural heritage and affordable housing. The GNMP also seeks to reinforce a number of employment hubs in the Hunter including the Airport and Port, which is supported. The GNMP has attempted to link the Hunter Regional Plan the proposed State Infrastructure Contributions (SIC) plan and Urban Development Program (UDP) process.

There are some concerns, however, which will need to be addressed in more detail as the GNMP is finalised.

STATE LEVEL COMMITMENT

The underlying premise of the GNMP is coordination and collaboration between the State Government (e.g. Hunter Development Corporation (HDC), Department of Planning and Environment) and Local Council's. This was clearly articulated as a positive benefit in Greg Clark's work prepared for the Department based on overseas examples. At no point in the GNMP is this matter addressed, nor is there any commitment from the State Government to invest in an agency or commission to drive the outcomes desired in the GNMP. HDC has been identified as providing a coordination role, and a proposed Committee for Greater Newcastle has been identified to "advise" the government. At present there appears to be no authority or agency who will be responsible for ensuring the implementation of the GNMP.

As an example, in June 2013 the then Minister for Planning, Brad Hazzard, announced funding as part of the Housing Acceleration Fund (HAF) for an intersection at Lochinvar on the New England Highway. To our knowledge some five years later the design process has only just been initiated.

GOVERNANCE

It is recommended that a Commission be established to oversee the implementation of the GNMP with relevant authority to ensure it is implemented. At present it is unclear how the relationship between the proposed Committee for Greater Newcastle and the Hunter Development Corporation will interact. The Committee is identified as having an “advisory role” and Hunter Development Corporation as a “coordination role”. The question remains as to who is overseeing the GNMP and ensuring its implementation.

In addition, the success of the GNMP will depend on a number of factors specifically the role and engagement of other State agencies (outside of Planning). How is an advisory committee and/or a coordination authority supposed to ensure other government agencies are implementing the relevant matters in the GNMP that would apply to them (e.g. RMS).

LOCAL ABORIGINAL LAND COUNCILS (LALC's)

The Hunter Regional Plan identified that the Department of Planning and Environment would work with LALC's to *identify priority sites that can create a pipeline of potential projects, and identify landholdings and map the level of constraint at a strategic scale for each site to develop options for the potential commercial use of the land*. These actions in the Hunter Regional Plan have not been translated or identified in the GNMP and is a significant gap. In fact, the GNMP appears to contradict the Hunter Regional Plan in this respect. The Hunter Regional Plan clearly articulates that economic independence is a core aim of the Aboriginal Land Rights Act 1983 (NSW). It is uncertainty how the DPE intends to address this when the GNMP clearly states that the DPE will focus housing delivery efforts on strategic centres, priority housing areas and urban renewal corridors. We hope that the intent of the statement in the Hunter Regional Plan was not just for the Department to map areas and/or constraints but to actually assist LALC's in developing their landholdings and ensure the long term economic independence of the LALC's in the Hunter. It would be recommended that the Department clarify their role with assisting LALC's.

EMPLOYMENT

Overall, the GNMP identifies the need to strengthen major employment area in the Hunter (e.g. Airport) and this is supported. However, the following issues appear not to have been considered:

- There is a significant area of land zoned in Black Hill yet the target for employment has been set at only 200 jobs. This seems to be way under the potential jobs in this area.
- It is a concern that there are no ‘catalyst areas’ (from Figure 4 of the GNMP) in Lake Macquarie. Given some of the larger single owned lots in Lake Macquarie compared to Newcastle it is unclear why there are no ‘catalyst areas’ in Lake Macquarie.
- It is unclear why the Department is proposing to discuss relocating the Carrington Coal Facility and other employment areas on the Carrington peninsula. The Department should provide clarity on why this is being proposed when this coal facility contributes significantly to the coal handling capacity of Newcastle Port, and the GNMP specifically identifies the Port as a major employment area into the future.

- Land on the northern side of Industrial Drive needs to be considered for a range of uses that compliment or supplement the Port as well as the surrounding residents. The NSW Chief Planner has presented previously on the nature of 'business precincts' and their mix of uses, yet the GNMP does not seem to contemplate the Port as having a mix of uses. The northern side of industrial drive (outside of the lease area) would seem an obvious choice to allow other uses that would support the port (e.g. accommodation, vehicle hire premises, business services). The terminology used in the GNMP as well as the permissible land uses in the Three Ports SEPP does not provide any confidence to any investor that the Port will be a modern 'business precinct' and that services for adjoining residents are warranted. In relation to bulky goods, the Department will need to consider that the redevelopment of Wickham and the CBD will create ongoing pressure for bulky goods retailers to establish near the centre of Newcastle. The Department should consider this in the final GNMP – the land off Industrial Drive (outside of the lease area) provides opportunities for a range of businesses and to promote employment growth in this area.

HOUSING SUPPLY

The GNMP articulates that there is enough zoned land to cater for potential population growth in the Lower Hunter. This statement continues to be perplexing when sufficient evidence exists that supply is not meeting demand. As the table below identifies between the 2011 and 2016 Censuses the number of *new* private dwellings in the five Lower Hunter Council's averaged 2,619 dwellings per annum. That this rate, based on the targets in the draft GNMP, there will be a shortfall of nearly 8,000 dwellings.

	2011-2016¹ Change in Dwelling Numbers	Total Dwellings Continuing Trend between Censuses (over 20 years)	GNMP Target	Difference to Target²
LGA				
Newcastle	3,117	12,468	16,800	-4,332
Lake Macquarie	3,135	12,540	13,700	-1,160
Port Stephens	1,833	7,332	11,000	-3,668
Cessnock	1,277	5,108	6,300	-1,192
Maitland	3,733	14,932	12,500	2,432
Total	13,095	52,380	60,300	-7,920
Average Per Annum	2,619		3,015	-396

1. All private dwellings excluding improvised dwellings (e.g. rough sleepers).
2. Negative value means a shortfall.

While it is recognised that there may have been an increase in development applications (DAs) in recent years this does not negate the fact that at current construction/completion rates this will leave a shortfall of dwellings over the life of the GNMP. Comments such as that there is enough zoned land are misleading and also contradict the Plan's aim of promoting affordable housing. This comment is even more perplexing when the GNMP aims to have a larger proportion of infill development within centres. A large proportion of infill development will require site amalgamation. Who is going to undertake amalgamations? If Council's are not meeting targets (as may potentially occur as the UDP is rolled out) who is going to champion the cause for site amalgamations to occur? This is a major concern, and issue, when the GNMP states that

'comprehensive consideration of all residential release areas and urban renewal potential will need to be undertaken prior to identifying new release areas'.

The Department is fully aware that all rezoned areas for residential development do not meet their intended capacity at rezoning due to a number of issues such as mine subsidence, biodiversity and lead in infrastructure provisioning.

It is highly recommended that the Department clearly articulate in the final GNMP that Council's should identify enough land (both greenfield and infill) well in excess of their targets to ensure targets are being addressed.

This is also important because as obvious land for redevelopment in Newcastle LGA starts to dissipate other Council's areas may have to take up the slack, over the life of the GNMP.

DEVELOPMENT OF LAND BY LALC'S

The Hunter Regional Plan clearly articulated an action that the Department will work with Local Aboriginal Land Council's (LALC's) to identify a pipeline of projects to ensure the economic independence of LALC's. There is a major gap in the GNMP which has not identified how this action in the Hunter Regional Plan. It is hoped that the intent of this action in the Hunter Regional Plan was not for the Department to help "master plan" sites and then leave the "potential" rezonings to Local Councils, or for Council's to "potentially" identify them in a housing strategy. It is hoped that the Department will follow through on this action and assist in the rezoning of relevant lands owned by the local Aboriginal land council's. It is therefore recommended that the Department clearly articulate in the GNMP that local Councils will identify/engage with LALC's in preparing their Housing Strategy to identify LALC land for redevelopment, or alternatively the Department identify that they will work with LALC's to identify priority precincts for LALC's to redevelop.

CONCLUSION

Thank you for the opportunity to prepare a response to the exhibition of the Draft GNMP. Should you have any further queries please do not hesitate to contact the undersigned.

Yours faithfully,
MONTEATH & POWYS PTY LIMITED



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