



28 February 2018

Attention: Monica Gibson
Director Hunter Region
Department of Planning and Environment
monica.gibson@planning.nsw.gov.au

Dear Monica

RE: PIA Hunter Submission - Draft Greater Newcastle Metropolitan Plan

PIA commends the Department progressing the commitment in the Hunter Regional Plan 2036 (Regional Plan) to prepare a Metropolitan Strategy. The strategic links and objectives between the Regional Plan and draft Greater Newcastle Metropolitan Plan (GNMP) are clear and the identification of priority locations for economic growth furthers the intentions of the Regional Plan to generate the jobs which are the foundation for the growth of the region.

However, PIA believes that further work is required to transform the GNMP to a document that can provide the level of confidence, commitment and certainty required to deliver on its objectives. In particular, more details are required in relation to governance, implementation, financial commitments, prioritization and the use of proposed associated strategies that can take the GNMP from one with significant potential to one that can deliver. This submission summarises some of the areas of the draft Strategy that can be further enhanced and provides some recommendations on how these suggested improvements could be achieved.

State commitment to the Metropolitan Plan

Central to the success of this strategy will be the ongoing commitment from all relevant NSW agencies to achieving its objectives. Currently, there are major gaps in cohesive commitment to the implementation of regional and district plans. State agencies are not aligning budgets and priorities to the directions and actions in these region shaping plans and there are resulting major gaps in the alignment of development and infrastructure.

Considering lessons learned in other Australian States such as Victoria and Queensland, as well as the overseas examples identified in the Metropolitan Plan, it is difficult seeing the level of ongoing commitment required being achieved unless the implementation strategy is managed and lead politically by a sub-committee of Cabinet and/or by highly influential agencies such as Premiers and Cabinet or NSW Treasury in partnership with DPE. Given the significant economic contribution of Greater Newcastle to the nation and NSW generally,

PIANSW would like to see this commitment explicitly identified in the NSW State Plan and Premiers Priorities.

Governance, leadership and implementation

A plan is only as good as its implementation. Governance and implementation are the key issues as is the case with the Hunter Regional Plan 2036.

The GNMP references how it will be implemented (page19) with reliance on existing planning legislation and associated Ministerial Directions. A diagram illustrating the relationships between the broader implementation tools and a summary of the different roles they will play would assist all stakeholders invested in the success of Greater Newcastle and the Hunter region.

The Collaboration Agreement with the five Lower Hunter Councils is a good initiative. The proposed establishment of a collaborative governance framework is supported and the advice provided by Professor Clark is both useful and consistent with previous advice provided on this matter.

The collaborative governance framework can be led by the five Mayors of the Councils, the Parliamentary Secretary for the Hunter and the Minister for Planning. The five Mayors structure may be a derivative of the Joint Organisation of Councils or a separately constituted body. A Memorandum of Understanding should strongly underpin this Governance Framework and the role to be played in leading the implementation. It is critical that the influence, priorities and leadership of this Collaborative Body has direct connection with State political and bureaucratic leaders for inputs into NSW Treasury, budget and project and program prioritisation by infrastructure and service delivery agencies.

Professor Clark's discussion paper refers to various cities and metropolitan regions around the world and to various plans and strategies and covers far broader aspects of planning and delivery than identified in the draft Metropolitan Plan. The corresponding financial commitments in these documents appear to far outweigh those outlined or committed to with this draft Metropolitan Plan.

For example, it is unclear what will be the roles of the Hunter Development Corporation and the Committee for Greater Newcastle. How will they fit/supplement each other? It is not anticipated that the HDC will have determining influence over the activities of other key State agencies. The draft Plan does not explain or outline the role of other plans and strategies and the role these will play in terms of integrated implementation. For example the recently exhibited Hunter Transport Plan 2056 should explicitly align key actions and relevant implementation timeframes with the GNMP.

In the absence of terms of reference, it is also unclear how the Committee will work in practice. Who will have the "authority" and "power" to act or compel action if the Metropolitan Plan is not being implemented as intended.

The backbone to the Metropolitan Plan's success will be providing a rigorous governance and city growth framework detailing commitments to its delivery that –

- includes all agencies and levels of government.
- involves regular:
 - open reporting on priorities and progress
 - opportunities for public, professional and industry comment and review
- establishes:
 - relationship to and alignment with State government decision making, - prioritization -and budget
 - commitments and responsibilities of all involved
 - funding; and
 - timing.

Without these elements being fully outlined and committed to within the finalised Plan, its capacity to achieve real change will be significantly limited.

The rigor and broad acceptance of data analysis underpinning the Strategy

Much of the data collation and analysis underpinning the draft Plan (excluding Professor Clarkes metropolitan research contributions) appears to be unpublished. MacroPlan completed extensive, rigorous analysis which underpins the draft Plan. As with any good plan this data and analysis should be open source and published to provide rationales for the recommendations and the basis for further engagement, investigations and collaboration with and between stakeholders.

Scenario Planning

What are the known mega trends and existing and emerging technological trends that will influence the Greater Newcastle Metropolitan Plan and our communities approaching 2036. This discussion and sign posting is missing in the draft Plan. Driver-less cars and increased automation are likely to be the norm in many Hunter industries. How can these challenges and changes potentially shape the metropolitan form. Will scenario planning be tackled by the Committee for Greater Newcastle?

Greater Newcastle Metropolitan Plan - A living document

The Draft Strategy, as per the Regional Plan, starts off with a broad vision and objectives which provide context, as well as general purpose and direction. The content and direction are generally supported. However, the document struggles with wearing the twin hats of leading a broad vision and objectives as well as being a specific land use strategy. This could be resolved by separating the 'front end' – the vision, objectives and their intent, from the 'back end' which outlines how this will lead future land use and infrastructure decisions. This approach would provide greater capacity to refine the strategic directions and priorities for land use and infrastructure planning over the life of the document.

This suggestion would support the GNMP as a living document, able to accommodate rapidly changing information, technology and leading practices to support Greater Newcastle as a

Smart City on the global stage. Overall, this approach would serve to integrate governance, economic, social and environmental aspects of the strategy. To further empower the GNMP, it is recommended that the 'front end' of the strategy be jointly lead with the Department of Premiers and Cabinet with relevant agencies given ownership of the strategic delivery and review aspects of the plan.

'Five Elements Shaping Greater Newcastle'

It is understood that the intent of this part of the GNMP is relatively clear as is the role and importance of each element. However, while the first four elements have a clear spatial context, covering the area of the GNMP the fifth element is not so easily defined in geographic terms. The importance of the fifth element 'Iconic Tourism Destinations' is not disputed, but perhaps it would fit more appropriately in the economic elements of the Plan. Alternatively, this element could be integrated into each of the first four elements/place types.

Catalyst Areas and Local Government Areas Narratives

The intent of both these aspects of the GNMP are supported. However, they would benefit significantly by the provision of greater local content available in relevant local plans and strategies. These documents provide a lot of the context required to give greater depth and justification to the intentions currently summarized in these parts of the draft Plan.

Outcomes and Strategies

It is recommended that the four outcomes proposed on Page14 be more definitive, particularly when they are intended to summarise how they 'will deliver the Hunter Regional Plan goals'. The diagram at the bottom of this page also requires further elaboration to identify how it relates to all relevant local plans and strategies, rather than just LEPs.

Where do other relevant regional land use and infrastructure plans and strategies fit into this diagram such as the SIC? Further information on how success will be measured and associated reporting, monitoring and review for each Outcome and associated Strategy would be beneficial.

Concluding comments

PIA supports the Department in its commitment to deliver a Greater Newcastle Metropolitan Plan. The Vision and Strategies of the draft metropolitan plan set a solid basis for directing future decision making. However significant work is required to ensure these are brought to fruition through the operation of the GNMP and associated strategies.

Central to this is providing greater direction and commitment to a rigorous, inclusive and sustained governance framework. Also, further detail on how non-land use aspects of the Plan will be progressed is required.

The document could be enhanced by providing greater local context to the objectives and intentions for Catalyst Areas and Local Government Areas. It is recognised that this is likely to improve with the development of the proposed Local Housing Strategies. However, greater

recognition of local contexts and influences up front will further assist in setting the direction for each of these Strategies and the consideration of any proposals in the interim.

PIANSW is committed to collaborating with the Department and all Greater Newcastle stakeholders to see the finalised plan and subsequent implementation provide the planning and governance framework required to see this happen. Further detailed comments and clarifications for the Department's consideration are attached. If you have any questions concerning this submission please contact Scott Anson PIANSW Hunter Convenor c/o nswmanager@planning.org.au.

Yours sincerely

A handwritten signature in black ink, appearing to be 'S. Anson'.

Scott Anson FRPIA
PIANSW Hunter Convenor

A handwritten signature in black ink, appearing to be 'J. Rudolph'.

Jenny Rudolph
President PIA NSW

APPENDIX – Detailed comments, questions and clarifications

Metropolitan Plan Vision –

The vision provides a clear way forward and needs to be validated with stakeholders.

Additional comments relating to Catalyst Areas –

There is a significant area of land zoned in Black Hill yet the target for employment has been set at only 200 jobs.

It is recommended that Figure 4 - 'catalyst areas' for jobs targets include additional centres including: –

- Cardiff/Glendale
- Charlestown

What is the definition of a job for the purposes of this strategy (full time equivalent?).

The land to the north of Industrial Drive is identified as prohibiting retail and bulky good premises. Given the need for diversification as a key economic driver and Mayfield being in an urban renewal corridor there will be increasing pressure for other services (e.g. bulky goods retail premises, vehicle car hire places and the like) to establish in this area. While this should not detract from the Port and its associated activities there will be a need for support services for the Port (e.g. vehicle rental, potential short term accommodation, business services) as well as uses building upon the renewal of the CBD and Mayfield (e.g. bulky goods premises). Industrial Drive is a major connection point and this land (e.g. Mayfield North Industrial precinct) will over time come under pressure to provide these services.

Additional comments relating to draft strategies –

Strategy 1.1

Could be enhanced by further referring to the roles and activities of Newcastle City Council as well other State Agencies in addition to HDC.

Strategy 1.2

The inclusion of some economic actions would be beneficial.

Strategy 1.3

Expand to further discuss role and activities of Commonwealth Government agencies and the NSW Department of Trade and Industry in generating further growth.

Strategy 1.4

Expand to provide greater recognition of regionally significant public and private health facilities and services located in other parts of Greater Newcastle and their inter-relationships with the John Hunter and East Maitland Health Precincts.

Strategy 1.6

Expand on the broader roles of State Government in informing, preparing and delivering an environment that supports 'the New Economy'.

Strategy 1.7

The statements about 'branding' major events are positive. However, there needs to be some direction and assistance given to Councils to prioritise tourist facilities.

Need to discuss the role of high quality and coordinated infrastructure provision and management as a contributing factor to attracting and sustaining major events.

Strategies 2.1, 2.2, 2.3 & 2.5

Intent of Actions are solid but further elaboration is required to provide the guidance and direction required for Councils and other parties to achieve these outcomes.

Need to spell out the responsibilities of State Agencies to achieving these actions (particularly those for 2.2).

Strategy 2.4

Could be enhanced by summarizing the intent and directions for rural residential development, linking this strategy to Strategy 3.4.

Recommend that the 'Newcastle Earthquake' be discussed as part of a new Strategy under Outcome 2. This could consider earthquake potential as well as other aspects of 'resilience' such as planning and responding to the potential impacts of climate change, flooding and bushfire hazards.

Strategy 3.1

States that there is enough zoned land to cater for projected growth. The Department is requested to clarify the following observation. For example, between the 2001 and 2016 Census Lake Macquarie (minus homeless, rough sleepers) added 3,135 dwellings. Over the 20 year life of the Strategy this will potentially leave Lake Macquarie 1,160 dwellings short of their projection.

Considering the Strategy wants a larger proportion of infill, the Strategy will rely on site amalgamation. To achieve this it is recommended that more guidance and direction be provided by the Department on how this will be achieved through the proposed development of local housing strategies. This includes:

- identifying specific areas that the relevant Councils and Department will focus on
- what actions are proposed for each of these areas to achieve these targets.
- timeframes and;
- responsibilities.

The same Census figures reveal that Newcastle LGA added 3,117 dwellings between the late two censuses. This suggests Newcastle would be some 4,300 dwellings short of their projection in the Strategy.

The Strategy's comments that "Comprehensive consideration of all residential release areas and urban renewal potential will need to be undertaken prior to identifying new release areas." This is a concern if renewal areas rely on site amalgamation for development to occur, but new release areas cannot go ahead.

Recommend including a reference to how these intentions are proposed to work in collaboration with environmental objectives.

A range of State agencies are critical to achieving these actions (as both infrastructure owners and managers as well as land owners). It is recommended that their participation is noted.

Strategy 3.4

Reference to economic feasibility of rural residential development should be in relation to the 'life of development' rather than initial construction and sale.

The Lake Macquarie Action appears to be in the wrong context here and as a result runs the risk of giving the wrong message.

Strategy 4.1

Actions should also make reference to the importance of links to Belmont, Glendale and Swansea.

Note the potential role of Inner Bypass as an express connection between some of the centres.

Strategy 4.2

The justification provided, referencing 'national and international' case studies lacks a clear relationship to the Newcastle context. Further elaboration and investigation into potential benefits and other potential impacts required.

Strategy 4.3

What are the roles of Transport for NSW, Roads and Maritime Services and the Commonwealth Government in advancing these Actions?

Strategy 4.4

Recommend an additional action accommodating the ongoing investigation by the State government in collaboration with industry groups into emerging technological changes and how they can be capitalized on in Newcastle and surrounds.

Newcastle Port – Carrington Precinct

The Port of Newcastle, working with Newcastle City Council and NSW Department of Planning and Environment, will:

- *investigate the potential to relocate coal export facilities and bulk fuel storages away from residential areas and explore options to renew the Carrington Precinct for alternative uses (including tourism) [page 84]*

The utility of this action relating to the Carrington terminal is queried given that the Port of Newcastle has a 99 year lease and is guided by Newcastle Port Development Plan 2020. It is recommended that this action be revised and revisited as part of a future scheduled review.