From:
To:

Cc: <u>DPE PSVC Hunter Mailbox</u>

Subject: Buchanan - Submission to draft Hunter Regional Plan 2041

Date: Thursday, 20 January 2022 10:29:49 PM
Attachments: Buchanan - Submission to HRP 2041.pdf

Dear

Please accept this email as a submission to the draft Hunter Regional Plan 2041 on behalf of landowners at Buchanan.

We support many of the initiatives in the regional plan including Buchanan's recognition as a Priority Growth Area that can help delivering cost-effective growth for the region.

We also support the opportunity to work with government agencies, Council and the Department to deliver a unique and logical structure plan for Buchanan and the surrounding area. We look forward to being involved as the detail on how these plans progresses.

However, we have recommended slight amendments to the draft plan which are further discussed in the attached.

Namely:

- 1. Amending the boundary of the Buchanan Growth Area to **reduce significant risk from flooding** and help deliver sensible growth in the area
- 2. Identifying a **High Speed Bus or transit Corridor** for the Hunter Expressway to reduce car dependency and deliver sustainable growth for the region
- 3. Connecting **new homes to the Richmond Vale Rail Trail** to help support active and healthy lifestyles in the area.

We look forward to working with you and your team throughout the finalisation of the Hunter Regional Plan 2041 and the delivery of structure plans for Buchanan. Regards,

Buchanan Growth Area

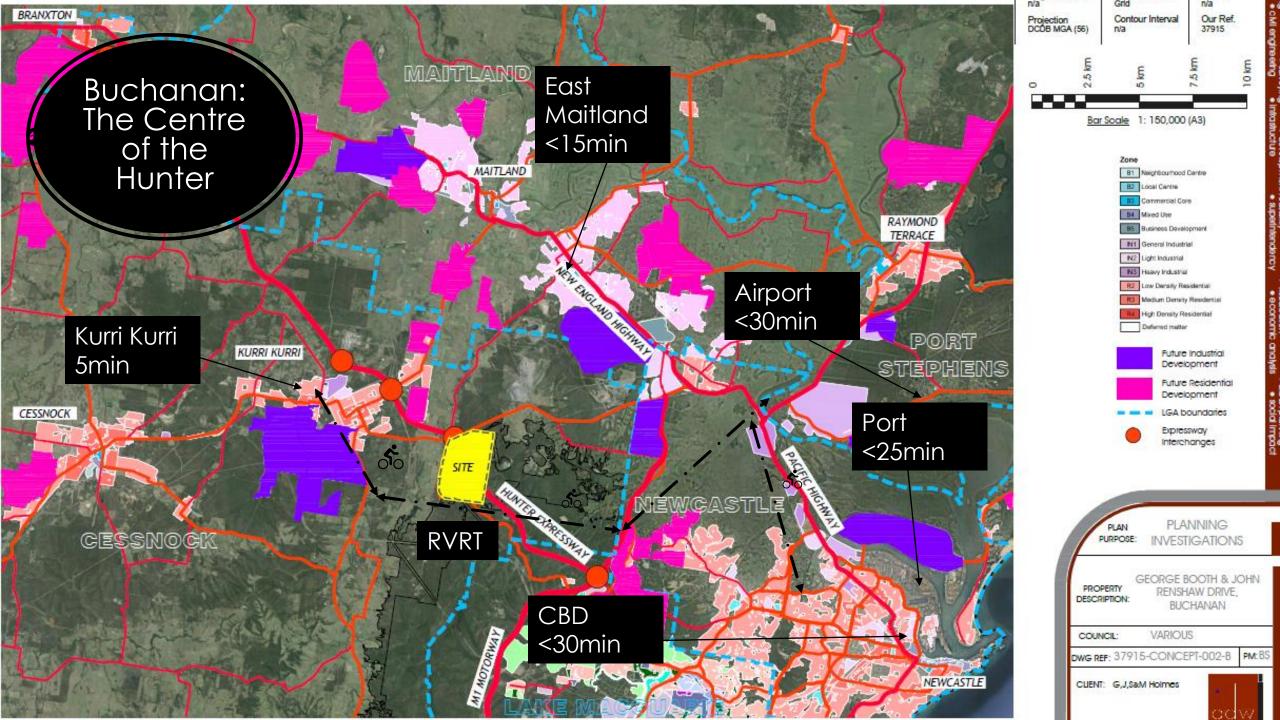
THE CENTRE OF THE HUNTER – DELIVERING A LEGACY FOR THE HEX AND THE RICHMOND VALE RAIL TRAIL

Proposed amendments - Summary

- 1. <u>Amend the boundary of the Buchanan Interchange Growth Area to:</u>
 - Remove land that is subject to significant flooding risk
 - Reflect existing employment land uses on the ground
 - o Support activation and extension of the Richmond Vale Rail Trail (RVRT) cycle network through Buchanan.
- 2. Support cost-effective growth along active transport corridors by strengthening the opportunity for development at Buchanan.
- 3. Identify a <u>high-speed bus-corridor</u> for the Hunter Expressway to help deliver a 30-minute Hunter Region and reduce car-dependency in the Hunter.
- 1. Amend Figure 7 to identify Growth Areas and infrastructure opportunities across the Metropolitan Area.

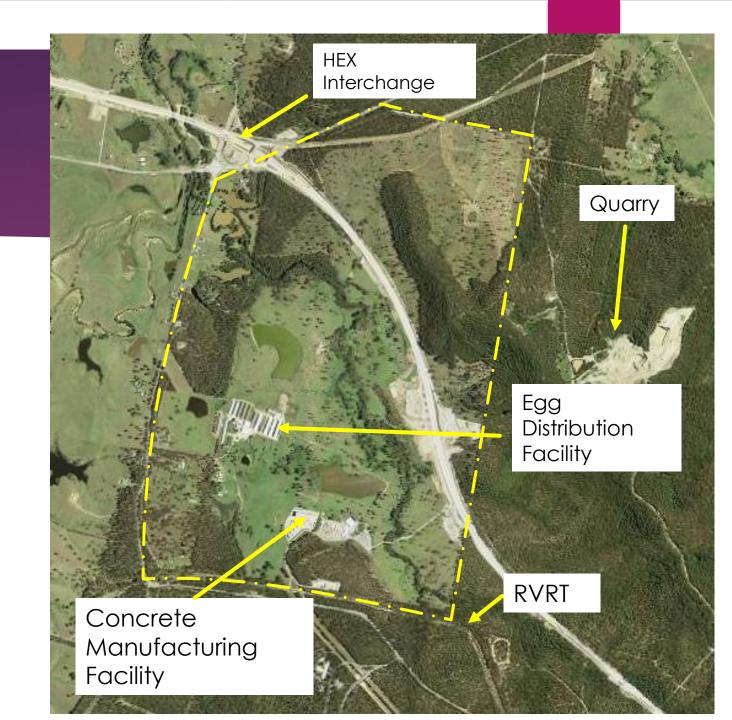
Context

BUCHANAN – DELIVERING COST-EFFECTIVE GROWTH AT THE CENTRE OF THE HUNTER



Site

- ► Employment generators
- Concrete facility The only facility of its kind in NSW, RMS.
- Opportunity to activate RVRT





Structure Plan

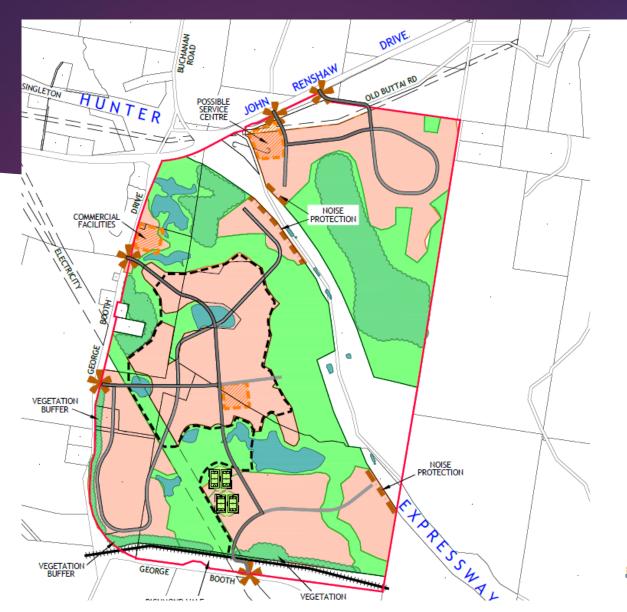
1: Deliver costeffective growth;

2: Connect cycle and walking paths to RVRT

3: Conserve environmentally significant areas

4: Reduce risk to property and life

5: Provide world-class infrastructure to support active and healthy lifestyles



Buchanan Village



Preliminary Structure Plan

Origin of levels
n/a

Projection
DCDB MGA (56)

North Direction Grid Contour Interval Intial plan date 02/04/2014 Survey n/a Our Ref.

LEGEND

STUDY AREA

CADASTRAL BOLINDARI

NOISE PROTECTION

CYCLEWAY

RICHMOND VALE RAIL LINE

MINOR ROAD

MAJOR ROAD

Urban Land

OPEN SPACE / CONSERVATION

EXISTING DAMS

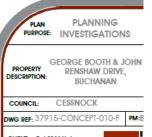
SPECIAL USES (CONVERCIAL, SERVICES CENTRE,

CHILD CARE, VILLAGE CENTI

VEGETATION BUFFER

INTERSECTIONS ONTO EXISTING ROAD





Strategic
Alignment of
Buchanan

DELIVERING COST-EFFECTIVE GROWTH IN THE CENTRE OF THE HUNTER

Map 2: Productive SINGLETON Site Critical Viticultural Cluster Airport Hunter Expressway Rail Corridors (Public & Private) Ellalong Lagoon Regional Roads Future Major Employment Nodes Greater Blue Mountains World State Forrest Hospital National Park Hunter Valley Wine Country Sub-regional Centre Mount Yengo Local Centre Emerging Local Centre

Cessnock LSPS

- Buchanan is identified as Future Major Employment Node in the Cessnock LSPS
- The LSPS supports growth where it facilitates opportunities surrounding the HEX

Hunter Regional Plan 2041 - Alignment

Draft HRP 2041 Policy

- ▶ 15 Min Neighbourhood
- 30 Min connections
- Growth within 30min of Newcastle Airport
- ► Connect new homes and jobs to open space, expand growth areas where connected to active transport (5.3).

Buchanan aligns with new policies in the HRP

- <5min to Kurri Kurri, <15min to East Maitland
- <30min to Newcastle Airport, CBD and Port
- RVRT (active transport) on the doorstep of Buchanan which provides an opportunity to support active lifestyles in the Lower Hunter.

Cost-effective growth

- ► HEX contains significant capacity for increased growth Opportunity to build on the \$1.7 Billion Infrastructure Legacy
- Local intersection upgrades at the cost of the developer (where above existing demand)
- Open-Space or other local infrastructure delivered by the Developer
- Lead-in Waste/Water connection \$8.2M (\$3,000 per lot, assuming 2500 lots) at the cost of the Developer

Suggested Amendments

SUMMARY

1: AMEND THE BOUNDARY OF BUCHANAN GROWTH AREA

2: IDENTIFY THE BUCHANAN PRECINCT IN THE INTERCHANGE GROWTH AREA

3: IDENTIFY HIGH-SPEED PUBLIC TRANSPORT ALONG THE HEX

4: IDENTIFY GROWTH AREAS IN ALL MAPS, INCLUDING THE METROPOLITAN AREA

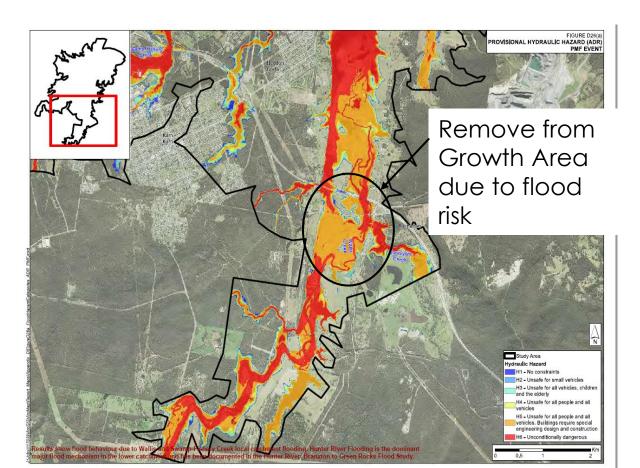
1.0 - Amend theBuchanan InterchangeGrowth Area Boundary

REDUCE RISK TO LIFE AND PROPERTY

STRENGTHEN ALIGNMENT WITH HRP 2041 BY DELIVERING GROWTH ALONGSIDE INFRASTRUCTURE

Summary – Amend the Growth Area Boundary to reduce risk from flooding and support activation of the RVRT

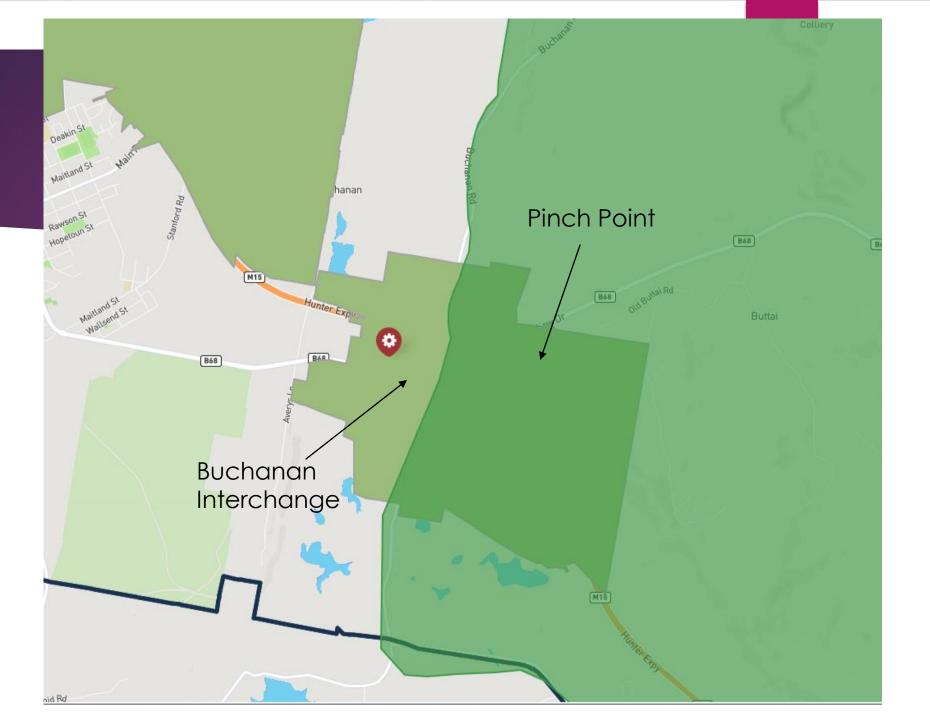




Overlapping Boundaries

Reason 1:

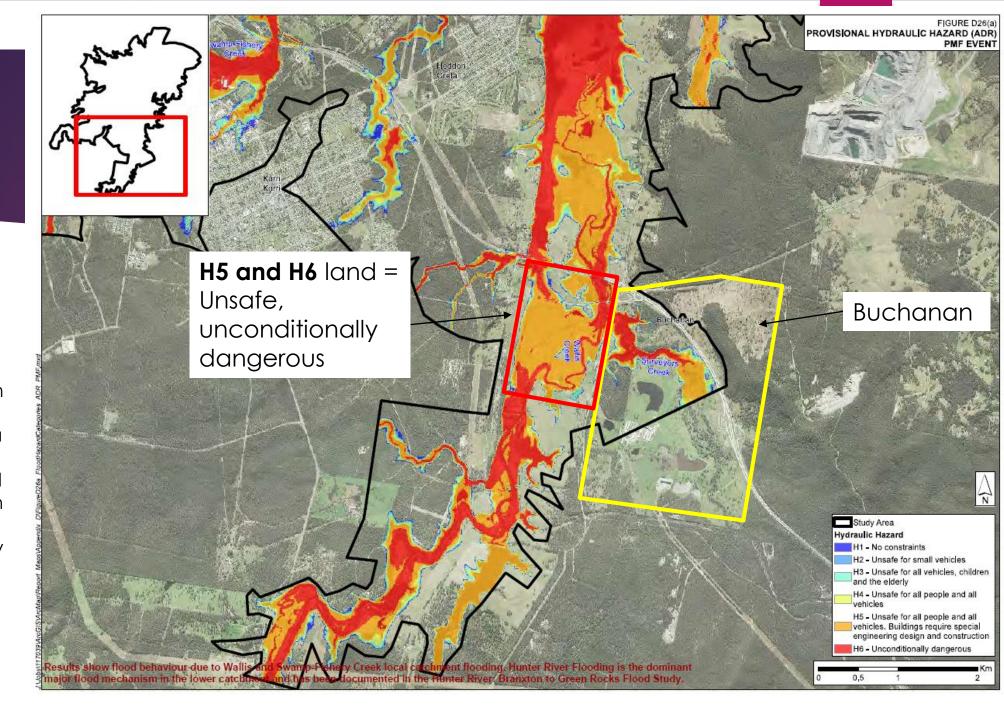
The Pinch Point and Buchanan Growth Areas in HRP 2041 overlap and have conflicting objectives. These competing objectives undermine the effectiveness of delivering new growth in Buchanan.



Flooding Risk

Reason 2a:

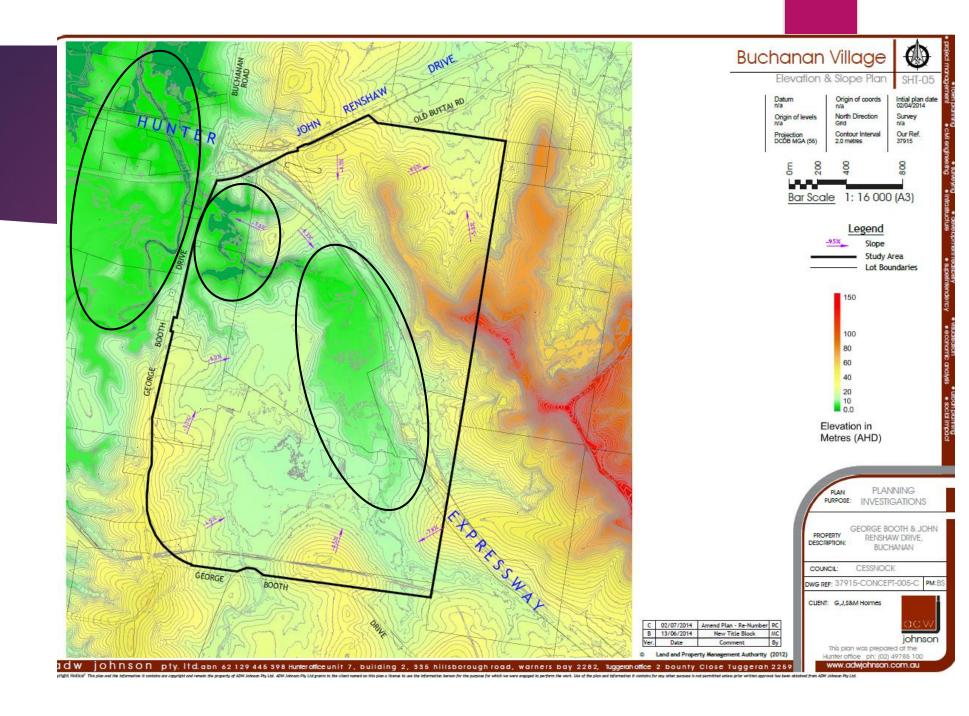
There is significant flooding risk for the land in the Red. This land is identified as a future area for employment in the growth area, which could never be achieved, given the risk. To manage risk and deliver on the legacy of the HEX, suggest new investigations areas are identified.



Flooding Risk

Reason 2b:

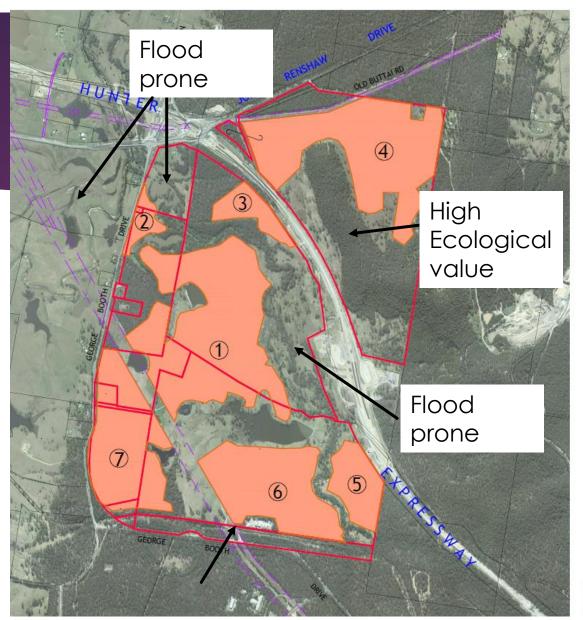
Buchanan structure planning has considered flooding risk.



Flooding Risk

Reason 2b continued:

Previous structure planning has considered risks and identified safe development footprints.







Precinct Plan

Origin of coords

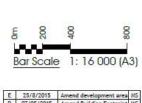
Origin of levels

North Direction Grid Contour Interva Intial plan date 02/04/2014 Survey n/a Our Ref. 37915

- Precinct 1 Predominantly Cleared, flat, Views to eastern ridgeline and Mt. Sugarloaf. Existing dam to be reduced in size. Developable Area = 87.16 ha.
- Precinct 2 Cleared, Direct Access to George Booth Drive, Preferred Commercial Site. Development Area = 5.68 ha.
- Precinct 3 Moderately Sloping, Cleared to Ridge Line, Potential Noise Issues from Hunter Expressway. Bushfire threat from West. Access over major creekline. Development Area = 10.34 ha.
- Precinct 4 Generally cleared. Moderate slope, access issue to John Renshaw Drive. Potential service centre site. Development Area = 69.43 ha.
- Precinct 5 Moderate sloping, Bushfire issues to east, potential noise issues from Under Expressway Access across minor creekline. Development Area = 16.22 ha.
- Precinct 6 Moderate sloping plus flat flood liable land, requires clearing of EEC and some filling. Adjoins Richmond Vale Rail Trail, Access to George Booth Drive.

 Development Area = 44.90 ha.
- Precinct 7 Scattered trees, cleared understorey plus some bushland (EEC). Development Area = 45.66 ha.

Total Precinct Development Area = 279.39 ha.

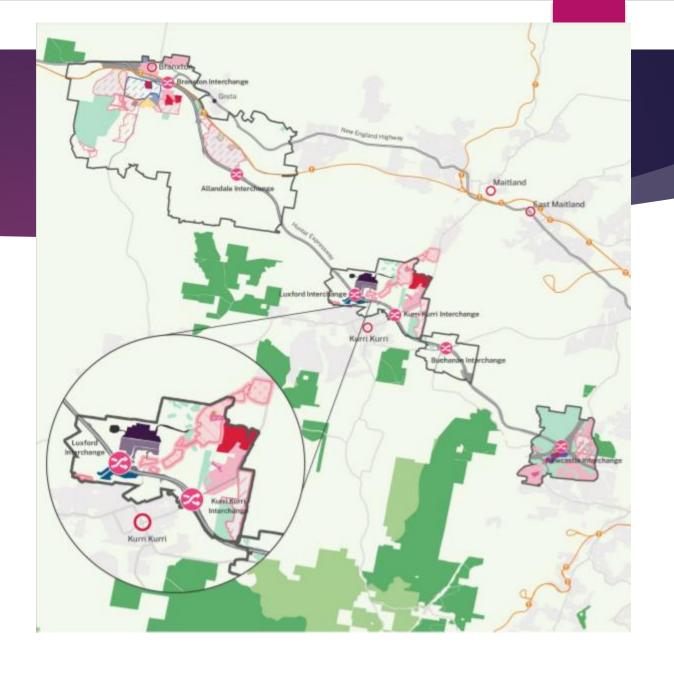




This plan was prepared at the

Align infrastructure with growth

- ► Reason 3: Align infrastructure with growth
- The cost to service growth in Buchanan is approximately **\$3k/Lot**.
- The RVRT runs adjacent to the site which provides an opportunity to deliver sustainable growth serviced by active transport.
- The \$1.7Billion HEX is on the doorstep of Buchanan. Recent transport upgrades support cost-effective delivery of new growth in the centre of the Hunter.
- ► The approach to Buchanan is inconsistent with all other interchanges.

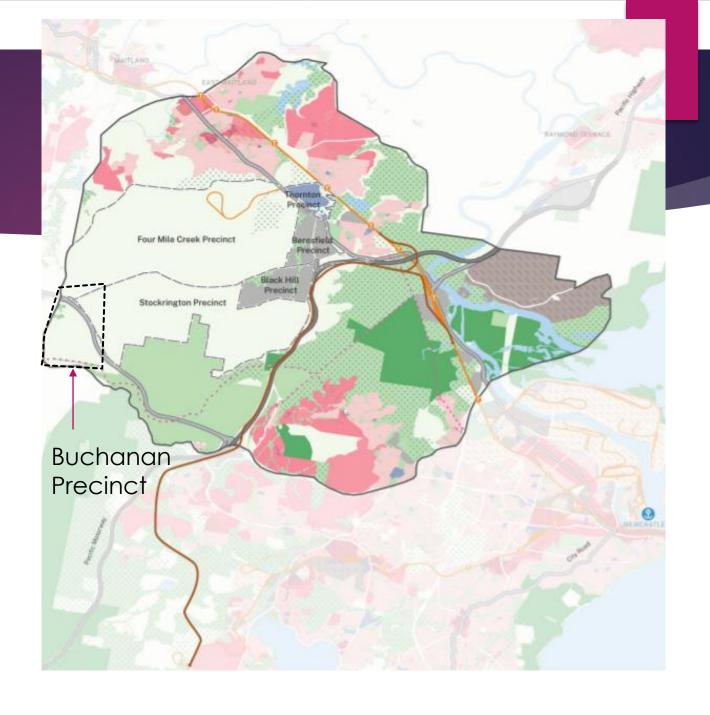


2.0 - Amend the National Pinch Point Precinct

ALIGN THE BUCHANAN INTERCHANGE GROWTH AREA AND NATIONAL PINCH POINT GROWTH AREA

Summary

Identify a
Buchanan Precinct
and include placebased objectives



Proposed objectives – Buchanan Precinct

Existing (Stockrington)

- Conserve high environmental value lands
- Promote rural lifestyles
- ► Enable ongoing resource extraction

Proposed (Buchanan)

- Conserve high environmental value lands
- Minimise risk from flooding and bushfire
- Activate new housing along the Richmond Vale Rail Trail Corridor to support active and healthy lifestyles
- Connect cycle paths in surrounding developments to the Richmond Vale Rail Trail
- Secure land for freight, logistics and employment land uses at the Buchanan interchange
- Limit encroachment of sensitive land uses close to the Buchanan interchange

Reasons to identify the Buchanan Precinct

- 1. Support a legacy of aligning growth with active transport in the Hunter:
 - Support investment in the RVRT whilst delivering new homes and jobs in close proximity to active transport;
 - Provide cost-effective growth as Buchanan will only cost approximately
 \$3,000/Lot to deliver growth in the area.
- 2. Provide clarity between the Pinch Point Growth area and the Buchanan Interchange Growth Area.

3.0 – Identify a high-speed transit or bus corridor on the Newcastle Link Road and Hunter Expressway

SUPPORT DELIVERY OF THE 15 MINUTE NEIGHBOURHOOD AND CITY BY REDUCING CAR-DEPENDENCY IN THE HUNTER

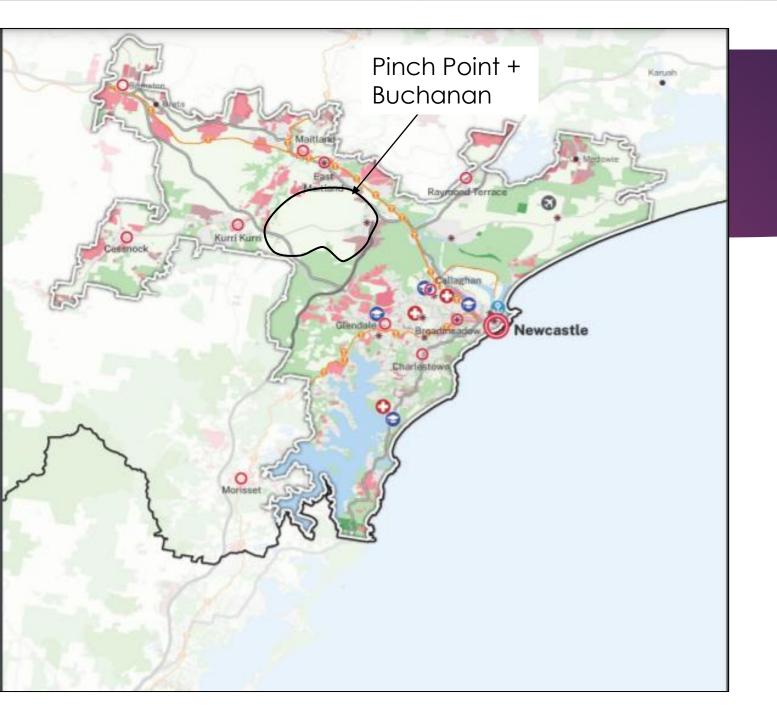
Newcastle Potential high-speed bus corridors

Identify high-speed public transport corridors

- Identify Public Transport Priority Areas – Recommend High Speed Bus Corridors to service growth fronts and deliver the 30min region.
- Increase resilience The Maitland to Newcastle rail corridor is prone to flooding.
- Increase choice
- Reduce private vehicle usage.

4.0 – Amend Figure 7

IDENTIFY GROWTH AREAS AND INFRASTRUCTURE OPPORTUNITIES



Reinforce priority growth areas

Suggested Amendment:

Within the context and growth area maps, identify priority metropolitan Growth Areas to strengthen their significance moving forward.

Suggested amendments on Figure 7

Buchanan Growth Area - Summary

- 1. <u>Amend the boundary of the Buchanan Interchange Growth Area to:</u>
 - Remove land that is subject to significant flooding risk
 - o Support activation and extension of the Richmond Vale Rail Trail (RVRT) cycle network through Buchanan.
- 2. Support cost-effective growth along active transport corridors by strengthening the opportunity for development at Buchanan.
- 3. Identify a <u>high-speed bus-corridor</u> for the Hunter Expressway to help deliver a 30-minute Hunter Region and reduce car-dependency in the Hunter.
- 4. Amend Figure 7 to <u>identify Growth Areas</u> and <u>infrastructure opportunities</u> across the Metropolitan Area.

Hunter and Central Coast Regional Plan





Hunter Regional Plan

The Environment Policy branch has reviewed the draft Hunter Regional Plan. In future, we would appreciate if we could contribute to or comment on a draft version of the regional plans of finalisation, especially so we can advise on emerging policy issues relevant to the region.

We have identified the following for consideration:

 The regional plans should consider the NSW Treasury Audit that identified land use planning in particular the regional plans to help address climate change. https://www.audit.nsw.gov.au/our-work/reports/managing-climate-risks-to-assets-and-services

Natural Hazards

- The Plan should consider the principles in the <u>Strategic Guide to Planning for Natural</u> Hazards.
- It is unclear if the identified growth areas have considered the Strategic Guide to Planning
 for Natural Hazards or been chosen due to their limited exposure to natural hazard risk or
 ability to build resilience in their communities.
 Natural hazard resilience should be incorporated into all aspects of the plan i.e. planning
 growth areas, greening cities, selecting road upgrades, infrastructure etc.

Coastal Issues and Marine Policy

- Opportunities for identifying blue carbon should be incorporated into the regional plan. The blue carbon approved method can be found here https://consult.industry.gov.au/blue-carbon-method.
- There are opportunities for further consideration of the coastal environment, particularly in Part 3.
- The marine estate is valuable to regional areas particularly for tourism, in 2018-19 it was estimated that the marine estate contributed \$15.4 billion in value added (2.7% of NSW economy) and approximately 108,000 FTE jobs (2.5% of total NSW employment) with an estimated 87% of those industries dependent on a healthy marine estate (please note this information is not yet public and should not be released). As such, the regional plan should consider the importance of the marine park and aquatic reserves and how they have been accounted and protected in terms of population growth, tourism and environmental impacts. They should also be shown on a Figure similar to the previous regional plan
- The plan should identify the Port Stephens Great Lakes Marine Park and Ramsar wetlands on a Figure.
- Suggest strategic planning and development more broadly look at the improvement of
 water quality measures to protect marine parks and aquatic reserves, as well as any other
 environmentally sensitive downstream assets. This could include water sensitive urban
 design and ensuring appropriate locations and intensity of development.
- Note for information only: there is currently a new marine park network plan on exhibition that should be considered. This is can be found at: https://yoursay.marine.nsw.gov.au/70682/widgets/345063/documents/

Hunter and Central Coast Regional Plan





Environmental Issues and Koalas

- Consideration should be given to including a goal to prepare a Koala Plan of Management under the Koala SEPP to strategically plan for and protect the local koala population.
- The Regional Plans should reference the importance of protecting koala populations in the region. In particular, the Hunter plan should acknowledge the important koala population of Port Stephens, Port Stephens Council's commitment to protecting koala populations via its long-standing Koala Plan of Management made under the Koala SEPP framework. The plans should also encourage councils with koala populations to work with DPE to develop new plans of management under the Koala SEPP framework
- Suggest the inclusion of a figure showing NPWS, nature reserves and marine areas more generally for the region.
- Consideration should be given to state significant agricultural land noting the draft State Agricultural Land Use Planning map https://www.dpi.nsw.gov.au/agriculture/lup

Climate Change

 Consideration should be given to the Adapt Climate Projections and changes in expected weather patterns which can be found at:

https://climatechange.environment.nsw.gov.au/projections-map

All regional plans should be addressing the Climate Risk Ready Guide and carrying out an assessment for their areas.

https://climatechange.environment.nsw.gov.au/sites/default/files/2021-06/NSW%20Climate%20risk%20ready%20quide.pdf

More specifically:

- Page 8 and 10 could benefit from including a statement about building resilience because of the natural hazard events the region has been through.
- Page 11 should have a point on building long term resilience and risk mitigation for long term sustainable development and climate change adaption including sea level rise.
- Page 14 states that the region is climate resilient. Consideration should be given to how
 this is the case and how it can be improved moving forward, the area has just experienced
 some devastating natural hazards over the last few years.
- Page 17, the urban development program committee should also add in building resilience to natural hazards that will reduce long term economic impacts.
- All the principles on Page 18 should consider natural hazard resilience as part of their identification and upgrading of areas to build long term risk reduction and climate adaption into the region. For example, the following could be considered: #1 should mention consideration of natural hazards (including projected future hazards with climate change) when identifying growth areas; #2 should consider natural hazard and climate risks to infrastructure and designing for resilience/adaptability; #3 should list resilience to natural hazards as a public benefit to be considered in multi criteria analysis; #4 should list natural hazards and climate resilience as factors to be considered in place strategies (alongside biodiversity and flooding).
- Strategy 1.1 should add a dot point regarding appropriate development for any risk from natural hazards.
- Objective 3 should discuss locating different uses appropriately to build resilience through buffers to natural hazards such as public space.

Hunter and Central Coast Regional Plan



- NSW
- Strategy 3.1 should discuss locating things like schools and hospitals in appropriate
 locations so they can continue to maintain functionality if the communities are affected by
 natural hazards.
- Strategy 3.2 refers to environmental disturbance which is not always a "minor impact", particularly if occurring in environmentally sensitive areas or locations with contamination or hazard constraints. Suggest reworking final sentence to reflect this.
- Objective 4 should have regard for the ability of local roads and infrastructure to cope with the evacuation of residents in emergency situations as well as the ability of services to maintain functionality especially in growth areas and higher densities proposed or isolated areas. This also needs to have regard for transient communities and tourist seasons.
- Objective 4 suggest also adding avoiding encroachment on environmentally sensitive areas to the list under 'Housing development in the Hunter will need to:'
- Objective 5 consider adding a strategy to address Blue Carbon storage. For example, 'Identify and plan for the protection of high carbon storage potential in areas such as mangroves, salt marshes and seagrasses. Ensure that development in these areas is compatible for its biodiversity value and carbon storage capability.'
- Objective 5 support the environmental context but there could be communications around utilizing natural features to the advantage of development by using them as buffers and ensuring they do not pose additional risk to communities.
- Strategy 5.1 could include location of public spaces as buffer areas and to appreciate natural assets that help to build resilience like banks of rivers and wetlands which can absorb water before it impacts development.
- Strategy 5.6 should reference threatened species and ecological communities
- Strategy 5.7 could be enhanced by discussing about utilizing public space between the housing development and biodiversity areas to increase resilience for both types of land.
- Strategy 5.12, the coastal management framework guides the management of the entire coastal zone (not just sensitive coastal lakes and estuaries). This broadly includes the open coast and foreshore areas, coastal lakes and lagoons, estuaries, areas of coastal wetland and littoral rainforest and areas adjacent to coastal areas where development has the potential to impact upon the scenic, social and coastal values of the coast.
- Objective 6 reword to 'reach net zero, increase resilience and provide sustainable infrastructure'.
- Objective 6, page 50 should discuss the principles in the strategic guide to planning for natural hazards.
- Objective 6 page 50 should reference the most up to date resilient infrastructure plan/policy, such as Guidelines for Resilience in Infrastructure Planning: Natural Hazards
- Objective 6, page 50 paragraph 2 could also mention significant coastal erosion events since 2016 (e.g. various events at Stockton Beach – widely reported in media). The climate change snapshot box could also mention projected changes in coastal hazards (including sea level rise and coastal inundation).
- Objective 6, page 51 'The more successful we are in mitigating the worst implications of climate change, the less pressure there will be to successfully adapt to those consequences' consider rewording to '...in mitigating the impacts of natural hazards and the expected increase of intensity and frequency due to climate change, the less...'
- Strategy 6.1 should reference the Strategic Guide to Planning for Natural hazards which I think is referred to as a draft planning for a more resilient NSW? This should also consider referencing the Resilient Infrastructure plan for the state.
- Strategy 6.2 consideration should be given to expand 'these' plans. It could specifically list plans or reference 'the best available guidance at the time' and possibly refer to the

Hunter and Central Coast Regional Plan



strategic guide to planning for natural hazards resources kit. This could also refer to plans/policies developed by councils (not just State government), such as Coastal Management Programs (or Coastal Zone Management Plans). Consideration should be given to an additional strategy that discusses the design of suburbs with buffer uses between hazards and encouragement of green infrastructure – strategy 6.5 could also tie this in. An additional strategy could also reference the strategic guide to planning for natural hazards like the North West Regional Plan

- Consideration should be given to including a graphic of the hazards for considerations when developing plans. Such as Figure 3 or 4 in the strategic guide to planning for natural hazards. North West regional plan has adopted this.
- Objective 8 and Figure 5 Hunter inter-regional transport connections has this considered the resilience of the roads, rail and sea in the event of natural hazards, is there options to enhance this or identify new routes that could be more resilient to natural hazards and other freight related shocks and stresses?
- Please ensure the priority areas for future housing been identified using the principles in the strategic guide to planning for natural hazards. Some of the growth areas on face value appear to be vulnerable to natural hazards and climate change. This is also relevant for identification of potential future growth areas in Figure 2 of Objective 4. The guide to planning for natural hazards toolkit gives guidance on where to find resources on natural hazards. Some resources which might be useful for identifying areas with coastal hazards, in particular, include:
 - List of significant open coast locations: p.16 of the <u>Coastal and Estuary Grant</u> <u>Guidelines</u>
 - Inundation hazard: <u>NSW Estuary Tidal Inundation Exposure Assessment (ZIP 9.2MB)</u> provides information about the exposure of current development to tidal inundation with sea level rise. (Note: this is the exposure of existing development, so some areas with high hazard but limited existing development may still be assessed as having low exposure.)

The documents in the package give specific information for each region – **see 5.3.2 of the main report for the Hunter region**. The report lists the 10 most exposed estuary systems in NSW as:

- 1. Lake Macquarie
- 2. Georges River
- 3. Brisbane Water
- 4. Tuggerah Lake
- 5. Richmond River
- 6. Hunter River
- 7. Tweed River
- 8. Clarence River
- 9. Parramatta River
- 10. Port Stephens.
- Sea level rise: <u>Coast Adapt</u> has sea level rise information (including maps) by LGA for different possible climate change scenarios
- Council information:
 - coastal hazard maps in LEPs and DCPs these sometimes go by other names like 'coastal planning area', and differ council-to-council in what they are showing
 - coastal erosion/hazard information on Council websites (there is often a dedicated webpage)



NSW

Hunter and Central Coast Regional Plan

- Stage 2 studies done for Coastal Management Programs (these include a risk assessment, which may include identifying coastal risks) – <u>this webpage</u> summarises the progress made on CMPs and provides hyperlinks to documents on Council webpages
- Coastal Zone Management Plans (CZMPs) prepared by councils CZMPs are the predecessor to CMPs, prepared under the old coastal framework. These can have important information on coastal hazards.
- Each of the district planning and growth areas have a diagram that incorporates 'sustainable and resilient' as a factor informing the growth in the area, there is little to determine how this is actually being incorporated.
- Coastal environments have been considered as a district planning priority for the 'Coastal' district, but other parts of the Hunter have sensitive coastal locations (including, but not limited to, coastal wetlands and/or littoral rainforests mapped under the Coastal Management SEPP). Suggest having this as a priority in other districts with sensitive coastal locations.
- The 'Coastal' district section notes where significant open coast locations (SOCLs) have been identified in the area. There are SOCLs in other districts in the plan (e.g. Stockton Beach in the Greater Newcastle district) which should also be noted in the relevant sections. A list of SOCLs is available at page 16 of the <u>Coastal and Estuary Grant</u> <u>Guidelines</u>.
- The Central Coast district sections include references to limiting development in environmental hazard areas (e.g. see p.62 Woy Woy Peninsula). Something similar should be adopted for the relevant areas within the Hunter District Plan.
- Page 126consider incorporating natural hazards and resilience as definitions that as taken from the Strategic guide to planning for natural Hazards.

Hunter and Central Coast Regional Plan





Central Coast Regional Plan

The environment policy team have reviewed the Central Coast Regional Plan, it is noted that this plan was not sent to us prior to exhibition and is very similar to the Hunter Regional Plan

We have identified the following for consideration:

 The regional plans should consider the NSW Treasury Audit that identified land use planning in particular the regional plans to help address climate change https://www.audit.nsw.gov.au/our-work/reports/managing-climate-risks-to-assets-and-services.

Natural Hazards

- The Plan should consider the principles in the <u>Strategic Guide to Planning for Natural</u> Hazards.
- It is unclear if the identified growth areas have considered the Strategic Guide to Planning for Natural Hazards or been chosen due to their limited exposure to natural hazard risk or ability to build resilience in their communities.
- Natural hazard resilience should be incorporated into all aspects of the plan i.e. planning growth areas, greening cities, selecting road upgrades, infrastructure etc.

Coastal Issues and Marine Policy

- Opportunities for identifying blue carbon and carbon storage areas should be incorporated. The method can be found here https://consult.industry.gov.au/blue-carbon-method.
- There are opportunities for further consideration of the coastal environment, particularly in Part 3.
- Suggest strategic planning and development more broadly look at the improvement of
 water quality measures to protect marine parks and aquatic reserves, as well as any other
 environmentally sensitive downstream assets. This could include water sensitive urban
 design and ensuring appropriate locations and intensity of development.
- For your information, there is currently a new marine park network plan on exhibition that should be considered. This is can be found at: https://yoursay.marine.nsw.gov.au/70682/widgets/345063/documents/

Environmental Issues and Koalas

- Consideration should be given to including a goal to prepare a Koala Plan of Management under the Koala SEPP to strategically plan for and protect the local koala population.
- Suggest the inclusion of figure showing NPWS, nature reserves and marine areas more generally for the region.
- Consideration should be given to state significant agricultural land noting the draft State Agricultural Land Use Planning map - https://www.dpi.nsw.gov.au/agriculture/lup

Climate Change

 Consideration should be given to the Adapt Climate Projections and changes in expected weather patterns.

https://climatechange.environment.nsw.gov.au/projections-map





All regional plans should be addressing the Climate Risk Ready Guide and carrying out an assessment for their areas.

https://climatechange.environment.nsw.gov.au/sites/default/files/2021-06/NSW%20Climate%20risk%20ready%20guide.pdf

More specifically:

- Page 10 and 11, could benefit from including a statement about building resilience because of the events the region has been through.
- Page 13 should have a point on building long term resilience and risk mitigation for long term sustainable development and climate change adaption including sea level rise.
- Page 16, states that the green infrastructure promotes community resilience. This does not
 address resilience from natural hazards or other shocks and stresses. Consideration should
 be given to how resilience can be incorporated moving forward, the area has just
 experienced some devastating natural hazards over the last few years and should be a key
 consideration.
- Page 19, the urban development program committee should also add in building resilience to natural hazards that will reduce long term economic impacts.
- Page 21, all these principles should consider natural hazard resilience as part of their identification and upgrading of areas to build long term risk reduction and climate adaption principles to the region. For example, the following could be considered: #1 should mention consideration of natural hazards (including projected future hazards with climate change) when identifying growth areas; #2 should consider natural hazard and climate risks to infrastructure and designing for resilience/adaptability; #3 should list resilience to natural hazards as a public benefit to be considered in multi criteria analysis; #4 should list natural hazards and climate resilience as factors to be considered in place strategies (alongside biodiversity and flooding).
- Objective 1 could discuss the road and rail linkages for evacuation and access during emergencies as well as freight of goods to keep the area functioning.
- Objective 3 should also discuss locating different uses appropriately to build resilience through buffer uses to natural hazards such as public space.
- Strategy 3.1 should discuss locating things like schools and hospitals in appropriate locations so they can continue to maintain functionality if the communities are affected by natural hazards.
- Strategy 3.2 environmental disturbance is not always a "minor impact", particularly if occurring in environmentally sensitive areas or locations with contamination or hazard constraints. Suggest reworking final sentence to reflect this.
- Objective 3.5 and 3.9 should also address the capacity and ability for roads to cope with increased population and the access and egress requirements for emergency evacuation planning.
- Objective 4 should have regard for the ability of local roads and infrastructure to cope with the evacuation of residents in emergency situations as well as the ability of services to maintain functionality especially in growth areas and higher densities proposed or isolated areas. This also needs to have regard for transient communities and tourist seasons.
- Objective 4 suggest also adding avoiding encroachment on environmentally sensitive areas to the list under 'Housing development in the Central Coast will need to:'
- Objective 5 The Hunter Plan discusses improving the natural environment, consideration should be given to incorporating this for the Central Coast

Environment Policy Review

Hunter and Central Coast Regional Plan





- Objective 5 consider adding a strategy to address Blue Carbon storage. For example, 'Identify and plan for the protection of high carbon storage potential in areas such as mangroves, salt marshes and seagrasses. Ensure that development in these areas is compatible for its biodiversity value and carbon storage capability.'
- Objective 5, page 42, paragraph 2 discusses connecting the green network, this should also discuss about connecting the blue network.
- Objective 5 support the environmental context but there should be communications around utilizing natural features to the advantage of development by using them as buffers and ensuring they do not pose additional risk to communities from natural hazards.
- Strategy 5.2 could include location of public spaces as buffer areas and to appreciate natural assets that helps to build resilience like banks of rivers.
- Strategy 5.3 could discuss replanting and the balance to not increase risk to bush fires.
- Strategies 5.5 and 5.6 appear to be missing.
- Strategy 5.7 could be enhanced by discussing utilizing public space between the housing development and biodiversity areas to increase resilience for both types of land.
- Strategy 5.7 should reference threatened species and ecological communities.
- Strategy 5.14 the coastal management framework guides the management of the entire
 coastal zone (not just sensitive coastal lakes and estuaries). This broadly includes the open
 coast and foreshore areas, coastal lakes and lagoons, estuaries, areas of coastal wetland
 and littoral rainforest and areas adjacent to coastal areas where development has the
 potential to impact upon the scenic, social and coastal values of the coast.
- Objective 6 reword to 'reach net zero, increase resilience and provide sustainable infrastructure'
- Objective 6, page 49 could discuss the principles in the strategic guide to planning for natural hazards.
- Objective 6 page 49 should also reference the most up to date resilient infrastructure plan/policy, such as Guidelines for Resilience in Infrastructure Planning: Natural Hazards
- Objective 6, page 49 paragraph 2 could also mention significant coastal erosion events since 2016 (e.g. events at Wamberal and Terrigal Beaches in 2020, described on this council webpage). The climate change snapshot box could also mention projected changes in coastal hazards (including sea level rise).
- Objective 6,page 50 'The more successful we are in mitigating the worst implications of climate change, the less pressure there will be to successfully adapt to those consequences' consider rewording to '...in mitigating the impacts of natural hazards and the expected increase of intensity and frequency due to climate change, the less...'
- Strategy 6.1 should reference the Strategic Guide to Planning for Natural hazards which I think is referred to as a draft planning for a more resilient NSW? This should also consider referencing the Resilient Infrastructure plan for the state.
- Strategy 6.2 consideration should be given to expand 'these' plans. It could specifically list plans or reference 'the best available guidance at the time' and possibly refer to the strategic guide to planning for natural hazards resources kit. This could also refer to plans/policies developed by councils (not just State government), such as Coastal Management Programs (or Coastal Zone Management Plans).
- Consideration should be given to an additional strategy that discusses about design of suburbs with buffer uses between hazards and encouragement of green infrastructure – strategy 6.4 could also tie this in. An additional strategy could also reference the strategic guide to planning for natural hazards like the North West Regional Plan.

Environment Policy Review

Hunter and Central Coast Regional Plan





- Consideration should also be given to including a graphic of the hazards for considerations when developing plans. Such as Figure 3 or 4 in the strategic guide to planning for natural hazards. North West regional plan has adopted this.
- Figure 5,page 60consideration should be given to resilience of the roads, rail and sea in the event of natural hazards, is there options to enhance this or identify new routes that could be more resilient to natural hazards and other freight related shocks and stresses?
- Please ensure the priority areas for future housing been identified using the principles in the strategic guide to planning for natural hazards. Some of the growth areas on face value appear to be vulnerable to natural hazards and climate change. The guide to planning for natural hazards - toolkit gives guidance on where to find resources on natural hazards. Some resources which might be useful for identifying areas with coastal hazards, in particular, include:
 - List of significant open coast locations: page16 of the <u>Coastal and Estuary Grant</u> <u>Guidelines</u>
 - Inundation hazard: <u>NSW Estuary Tidal Inundation Exposure Assessment (ZIP 9.2MB)</u> provides information about the exposure of current development to tidal inundation with sea level rise. (Note: this is the exposure of existing development, so some areas with high hazard but limited existing development may still be assessed as having low exposure.)

The documents in the package give specific information for each region – see 5.3.3 of the main report for the Central Coast. The report lists the 10 most exposed estuary systems in NSW as:

- 1. Lake Macquarie
- 2. Georges River
- 3. Brisbane Water
- 4. Tuggerah Lake
- 5. Richmond River
- 6. Hunter River
- 7. Tweed River
- 8. Clarence River
- 9. Parramatta River
- 10. Port Stephens.
- Sea level rise: <u>Coast Adapt</u> has sea level rise information (including maps) by LGA for different possible climate change scenarios
- Council information:
 - coastal hazard maps in LEPs and DCPs these sometimes go by other names like 'coastal planning area', and differ council-to-council in what they are showing
 - coastal erosion/hazard information on Council websites (there is often a dedicated webpage)
 - Stage 2 studies done for Coastal Management Programs (these include a risk assessment, which may include identifying coastal risks) – this webpage summarises the progress made on CMPs and provides hyperlinks to documents on Council webpages
 - Coastal Zone Management Plans prepared by councils CZMPs are the predecessor to CMPs, prepared under the old coastal framework. These can have important information on coastal hazards.

Environment Policy Review



Hunter and Central Coast Regional Plan

- Each of the district planning and growth areas have a diagram that incorporates 'sustainable and resilient' as a factor informing the growth in the area, there is little to determine how this is actually being incorporated.
- Coastal environments have been considered as a district planning priority for the 'Coastal' district within the Hunter Regional Plan, but not within the districts of the Central Coast Regional Plan. Areas of the Central Coast also have sensitive coastal locations (including, but not limited to, coastal wetlands and/or littoral rainforests mapped under the Coastal Management SEPP). Suggest including 'Coastal environments' as a priority in other districts with sensitive coastal locations.
- The 'Coastal' district section in the Hunter Regional Plan also notes where significant open coast locations (SOCLs) have been identified in the area. Any SOCLs in the area of the Central Coast Plan should be noted and the meaning explained in the relevant sections. A list of SOCLs is available at page 16 of the <u>Coastal and Estuary Grant Guidelines</u>
- References to limiting development in environmental hazard areas (e.g. see p.62 Woy Woy Peninsula) should refer to 'current and predicted future environmental hazard areas' (or similar) to account for climate change, including the impacts of sea level rise.
- Page 103 consider incorporating natural hazards and resilience as definitions that as taken from the Strategic guide to planning for natural Hazards.

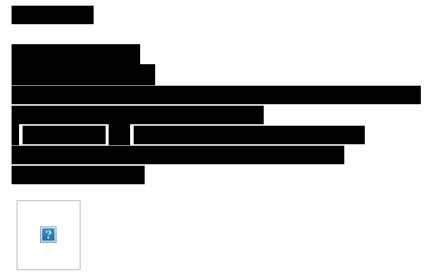
From: To: Cc: Subject: Hunter & Central Coast Regional Plan comments.docx

Date: Friday, 4 February 2022 11:49:30 AM

<u>Hunter & Central Coast Regional Plan comments.docx</u> <u>image001.png</u> **Attachments:**

Thanks again for meeting with us to discuss the Hunter & Central Coast Regional Plans last week. The Environment Team has reviewed the plans and provides the following specific advice. I hope this helps, please reach out if you have any specific questions about the feedback. I followed up on corridor mapping and we don't currently have this available to us. Please see attached document.

All the best



Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

From: DPE PSVC Hunter Mailbox To:

Cc:

Subject: Date: Submission to the Draft Hunter Regional Plan 2041

Wednesday, 2 March 2022 1:22:23 PM

Attachments:

image001 jpg image003 png image004 jpg 20220223 HRP Submission 239936 pdf

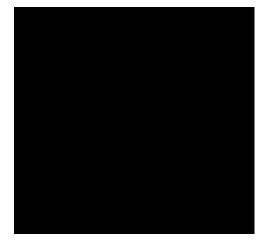
To Whom it May Concern,

Please accept the attached submission to the Draft Hunter Regional Plan 2041.

Regards,







2nd March 2022

SUBMISSION TO DRAFT HUNTER REGIONAL PLAN 2041

Introduction

The following submission to the Draft Hunter Regional Plan 2041 (Draft HRP) is made on behalf of being the owners of approximately 574 hectares of land at Lot 3057 DP1208470, straddling the border of Lake Macquarie City Council (LMCC) and City of Newcastle (CoN).

Background & Context

The are identified as being the biggest single future housing release area under the Greater Newcastle Metropolitan Plan 2036 (GNMP) and Newcastle Local Strategic Planning Statement (LSPS) 2024 (see Figures 1 and 2).

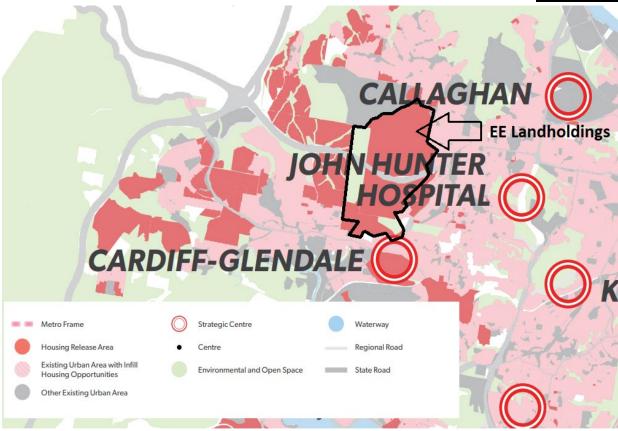


Figure 1: Extract from GNMP Figure 8 – Housing Opportunities

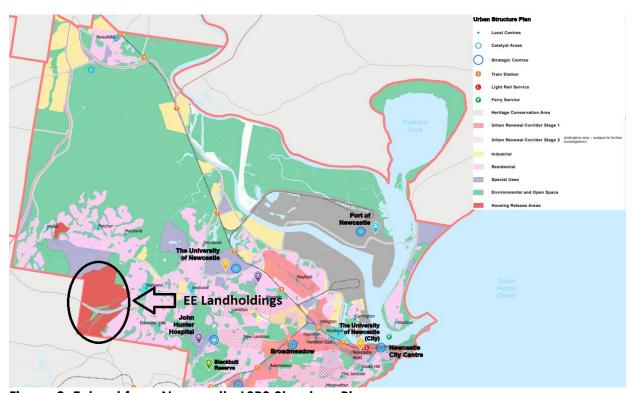


Figure 2: Extract from Newcastle LSPS Structure Plan



The are also one of only two areas identified as "investigation areas" under Figure 2 of the Draft HRP (i.e. land identified for future housing which is not yet zoned) (see Figure 3).

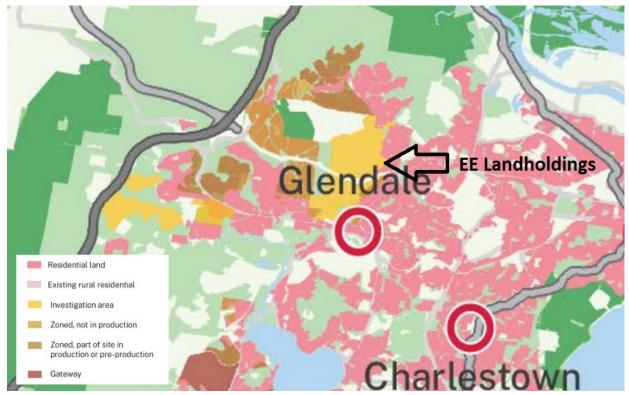


Figure 3: Extract from Draft HRP Figure 2 – Housing

Due to the ideal strategic positioning of this land, has submitted a planning proposal with both LMCC and CoN to support the future delivery of up to 3,000-3,500 lots/dwellings.

Submission

Fundamentally, wish to convey their support for the Draft HRP in its clear and deliberate promotion of infill development; coordinated infrastructure and growth delivery; higher densities and diverse housing; and encouragement of mixed land uses, to pave the way for the Hunter to evolve into a 15 minute city. Further, the key goals and strategies identified within the Draft HRP very closely align with the vision has for the re-development and master-planning of their landholdings.

Whilst fully appreciate the "high level" nature of the Draft HRP, the document does identify specific sites as being appropriate for future growth, and it clearly discourages the rezoning of "out of sequence" land.

Part 3 of the Draft HRP lists district planning and growth areas where government will focus efforts for future growth. The fall within the Greater Hunter District where under Figure 7 of the Draft HRP they are identified as "Hunter UDP" (Hunter Urban Development Program) (see Figure 4).



Figure 4: Extract from Draft HRP Figure 7 – Greater Newcastle district

The UDP is the NSW Government's program for managing land and housing supply and assists with infrastructure coordination in the Hunter. The Draft HRP provides the following figure illustrating the UDP's benchmarks and timeframes.

Urban Development Program benchmarks



10 to 15 years of land capacity required at any one time

The placement of the into an "investigation area" under the Hunter UDP, suggests development across this site may not be realised for 10-15 years.

Whilst the above benchmarks provide a rational timeframe at a base level, they don't recognise the fact that existing zoned land may not be able to be developed in the near future due to fragmented ownership or environmental constraints. With this in mind, it is important for the Draft HRP to acknowledge and encourage large landholdings which are currently unzoned, strategically positioned, and controlled by one owner, as being a vital way to achieve the objectives of the plan in the near future.

Request: Given the housing crises currently being experienced across the State, would strongly encourage inclusion of clear wording in the Draft HRP which can facilitate more immediate timeframes for unique situations such as the

Request: Further to the above, it is considered that the be mentioned under the Greater Newcastle District extract due to their significance and strategically ideal position for future growth. This section includes mention of new release areas in North-West Lake Macquarie; Wallsend; and the Hydro site at Kurri Kurri, but not the (pg. 65).

Within the introduction section of the Draft HRP, it states that the plan been prepared concurrently with Transport for NSW's draft Hunter Regional Transport Plan. Figure 11 of the Draft HRP identifies the northern portion of the pinchpoint place area" (see Figure 5). This area is noted as experiencing rapid growth and as a result acknowledges the importance transport infrastructure planning will play to the area.

Request: ask that the Draft HRP be re-notified concurrently with the draft Hunter Regional Transport Plan, in order to undertake a wholistic review of growth in the area.

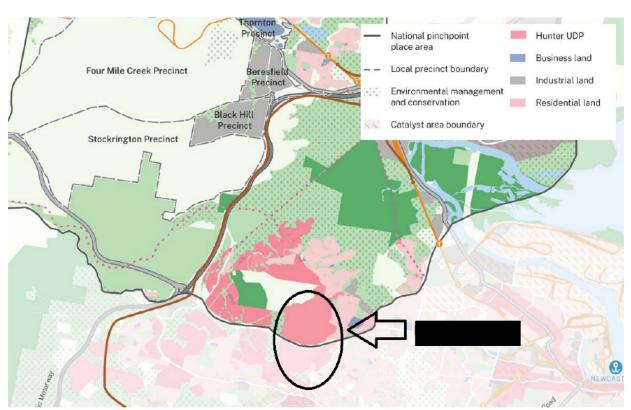


Figure 5: Extract from Draft HRP Figure 11 – National Pinchpoint



Summary

welcomes the development of the Draft HRP and the clear shift in policy towards a more sustainable future for housing in NSW. We would however, ask that the Department consider the requests made within this submission, to ensure developers such as are able to deliver great communities to the region within a timely manner.

We would welcome the opportunity to discuss this submission further with the Department, either at a site specific level, or more generally as a key stakeholder in the Hunter. I can be contacted at

Yours faithfully,



From:

To: DPE PSVC Hunter Mailbox

Subject: Submission - Draft Hunter Regional Strategy 2041

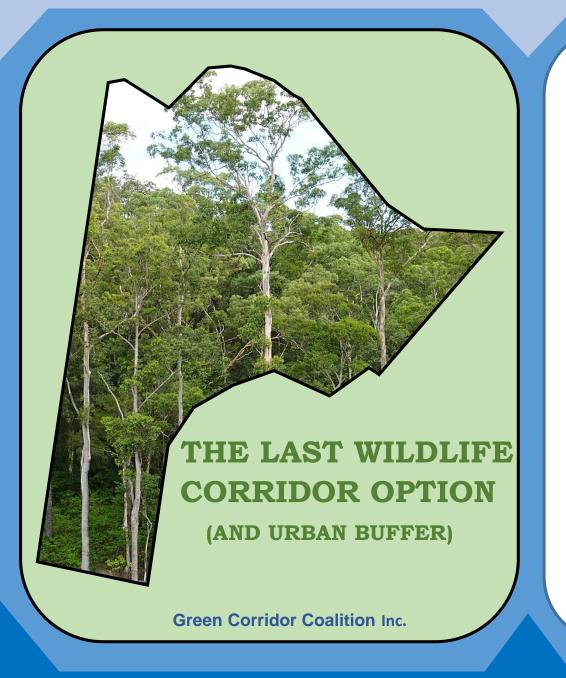
Date: Thursday, 3 March 2022 10:12:44 AM

Attachments: 2022 Submission 505 Minmi Road Fletcher.pdf

ATTENTION

Hello

Attached is Submission to Draft Hunter Regional Strategy 2041 as discussed on Tuesday. Please note Submission Section 2 Map L . 505 Minmi Road Fletcher is wrongly zoned as shown on the map and requires correction. Regards,





505 MINMI ROAD FLETCHER

DRAFT HUNTER
REGIONAL STRATEGY
2041
SUBMISSION
MARCH 2022

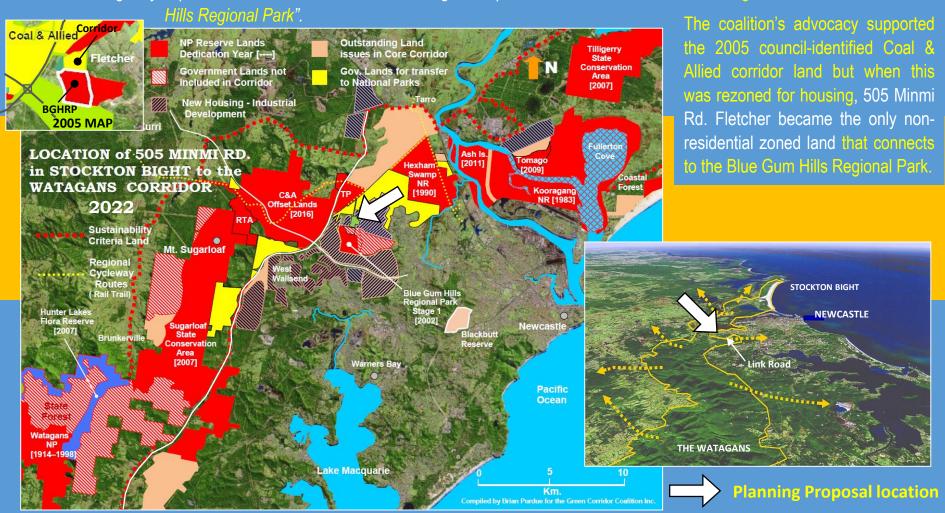


GREEN BIODIVERSITY CORRIDOR - BACKGROUND INFORMATION

The "Green Corridor" was launched at the Shortland Wetlands Centre in November 2003. The coalition that supports the corridor is comprised of over 40 Conservation and Community Groups, and were the main driving force that resulted in around 19,000 hectares of important wildlife habitat being added to the National Parks Estate, with a further 1,500 hectares pending – the Regional Park Corridor being part of these pending lands.

Extract from 2003 Green Corridor Coalition "Vision Statement"

"Conservation and, where needed, revegetation of the transitional ecosystems between the wetlands and the forests, including the strategically-important "Tank Paddock", the Pambalong Swamp Nature Reserve and the connecting areas to the Blue Gum



URBAN DEVELOPMENT PLANNING DECISIONS

Planning decisions for new housing developments in far western Newcastle will determine the ongoing liveability of this unique part of the city for current and future residents. Also at stake is the local extinction of a great deal of Newcastle's remaining native Wildlife (some threatened or endangered) due to the excessive clearing of their bushland habitat, with any remaining bushland in narrow gullies or on other development constrained land.

Enlightened outer-city planning is needed to retain some sustainable areas of vegetation, and scientific-width connecting corridors, to help ease the severity of ecological damage caused by ad-hoc urban sprawl; with this bushland and corridors also contributing to a positive lifestyle for residents and the city's heat sink.

The seemingly uncontrolled clearing of native bushland (950 hectares) for the huge number of new houses (8,000 projected) highlights the proposed clearing and subdivision of the partly gullied and heavily forested "505 Minmi Road at Fletcher" as urban development "gone too far", and is basically pointless by only adding a minute number (100) to the overall housing stock.

All too often ecological planning principles are overridden by "Greenfield" site exploitation, which could be seen as happening on this and neighbouring sites. This remnant strip of native bushland is the only sustainable Wildlife corridor left that connects the gene pool of the "Tank Paddock" (National Parks) and the "Regional Park" (National Parks), as well as being an urban-softening vegetated buffer - these being far more important than using the 17 hectares to build the proposed 100 houses.

Despite the unprecedented scale of the two nearby approved and proposed urban developments and the planning proposal's insignificant increase in housing of around 1%, our future city planners still come down on the side of this comparatively minor housing subdivision....This is unacceptable and irrational when weighed against the overall loss/benefit.

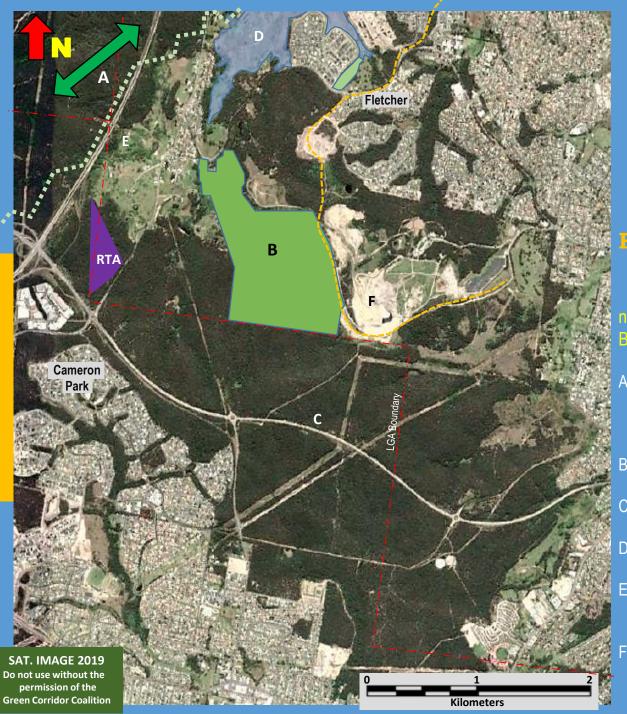


Section 1 INTERACTIVE MAPS & PLANNING DECISIONS 2022

Map 1 shows urban development in far western Newcastle and Lake Macquarie as of 2019.

Map 2 shows projected approved and proposed 5,800-lot developments and the 300 meter width (505 Minmi Road) Regional Park Wildlife Corridor and Fletcher / Minmi urban buffer.

Toggle maps back and forth to see development areas in relation to vegetated land, cleared land, gullies, creeks, etc.



MAP 1/2019

Go to Map 2 & back-step

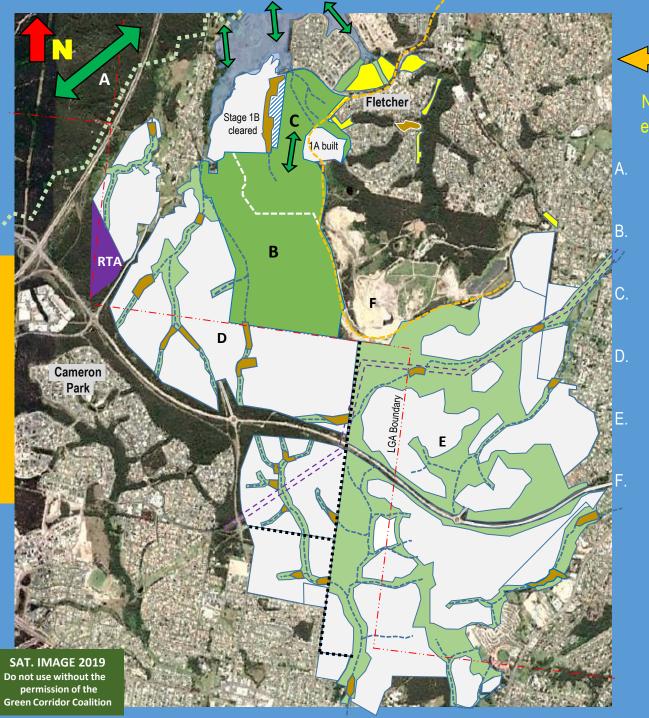
"BIG PICTURE" PLANNING DECISIONS

FAR WESTERN NEWCASTLE and LAKE MACQUARIE

Existing urban development & remnant key native bushland habitat - Green Corridor and Blue Gum Hills Regional Park relative location

- Stockton Bight to Watagans "Green Corridor" (Tank Paddock & Stockrington Conservation Area – NPWS)
- B. Blue Gum Hills Regional Park (NPWS)
- C. Newcastle Link Road
- D. Southern Hexham Wetlands (future NP)
- E. M1 Motorway & recommended Freight Rail Bypass Route
- F. Summerhill Waste Facility
 (City of Newcastle Council

Ridgeline

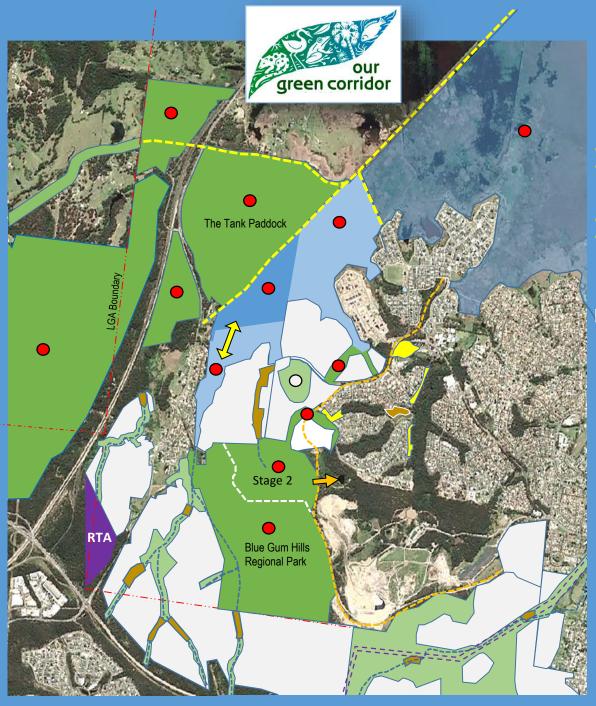


MAP 2/2022

Go back to Map 1 & repeat step

New 5,800 house sites & the strategic ecological location of 505 Minmi Road (C)

- Stockton Bight to Watagans "Green Corridor" (Tank Paddock & Wetlands)
- Blue Gum Hills Regional Park including part of Stage 2 (white dotted line)
- C. Wildlife corridor & Urban Buffer (505 Minmi Road, Fletcher plus E2 Blue-Green Grid)
- D. Winten Property Group (Coal & Allied Part 3A)Minmi Link Road development (Approved)
- Eden Estates (Newcastle) Pty. Ltd. (Xstrata Coal) Link Road (Proposed)
 - Summerhill Waste Facility (Newcastle Council)
 - Retained vegetation & gully creeks etc.
 - Regional Park Wildlife Corridor / Buffer
 - Proposed development areas LSPS
 - Infill housing (Current & proposed)
 - Stormwater detention basins (cleared)



MAP 3/2022 505 MINMI ROAD PLANNING PROPOSAL & PUBLIC OWNED ECOLOGICAL ASSETS

Map shows subject site subdivision would permanently isolate public ecological assets



Public owned assets



Privately owned gully



Ridgeline & Lookout

Richmond Vale Rail Trail (28 kilometer Cycleway)

HCCRPP EXTRACTS 505 MINMI ROAD GATEWAY DECISION 20 Sept. 2021

"......An independent report was presented to Council recommending that the matter could proceed to Gateway....."

A number of reports and internal documents are referred to in the Hunter & Central Coast Regional Planning Panel (HCCRPP) "Record of Decision" but some are not publicly available, or appear not to be? There needs to be full discloser to assess their contents and independence.

".....The Panel notes the nature of regional and metropolitan strategic plans and LSPS do not necessarily identify all areas that may be suitable for consideration for urban development......".

The HCCRPP overlooks a most disturbing and so far disregarded fact in this instance. Regional strategy mapping, Greater Newcastle Metropolitan Plan mapping and the Newcastle LSPS mapping show all developable land west of Wallsend (950 hectares) rezoned for housing or in a housing release area - except for one site - 505 Minmi Road, Fletcher. The Panel recommends that this small but key parcel of National Parks connecting native bushland should also be included, making the identified developable land for housing 100%.

If this is in fact so, then perhaps planning in NSW is worse than we thought.

NB Mapping from the 2006 Regional Strategy (Section 2 Map B) places the subject site in a non-housing "Regional Land" category and the 2009 Draft Western Corridor Strategy (Section 2 Map C) did not essentially change this because of the 2010 departmental rezoning refusal (Section 2 Map C). The HCCRPP's generalisation is not applicable in this case because 505 Minmi Road is clearly shown on the 2006 Regional Strategy mapping as part of a corridor to the Regional Park. The proponent's claim that the site has never been identified as a corridor is therefore false.

".....The Panel recognises the site is heavily vegetated and that a change in zoning would result in a loss of vegetation....."

What the Panel failed to recognise is a loss of this "last" vegetation (65% + cleared), when combined with the almost full clearing of surrounding subdivisions and 950 hectares for new housing, would leave no ecologically sustainable areas of vegetation and so no habitat or corridors for the continued survival of our Wildlife – local extinction of many species would be assured – but this does not have to happen if planned properly.

"...biodiversity corridors or policies applying specifically to the site, the consistency of the proposal against current biodiversity planning methods is a key consideration in determining the appropriateness of any mitigation requirements arising......"

The 2010 departmental rezoning refusal stated ".....the maintenance of habitat corridors which will be a determining factor in identifying the extent of

any residential development......" The importance of this Wildlife corridor is such that the <u>fully intact</u> corridor requires priority biodiversity offsets.

".....location of adjacent and nearby E2 zoned land to maintain the most viable biodiversity linkages to the remaining areas....."

There are three E2 zoned areas that form most of Council's "Blue-Green Grid" at Fletcher. All other bushland gullies are zoned R2 Residential or RE1 Recreation (Section 6 Map 1). This Blue-Green Grid is non-existent - all are narrow – all are wedged between subdivisions – one is permanently cleared for stormwater detention basins – and the last would be blocked by the proposed subdivision. The Panel appears not to realise this.



Section 2 HISTORY OF PLANNING PROPOSAL LAND USE IDENTIFICATION STRATEGIES & PLANS

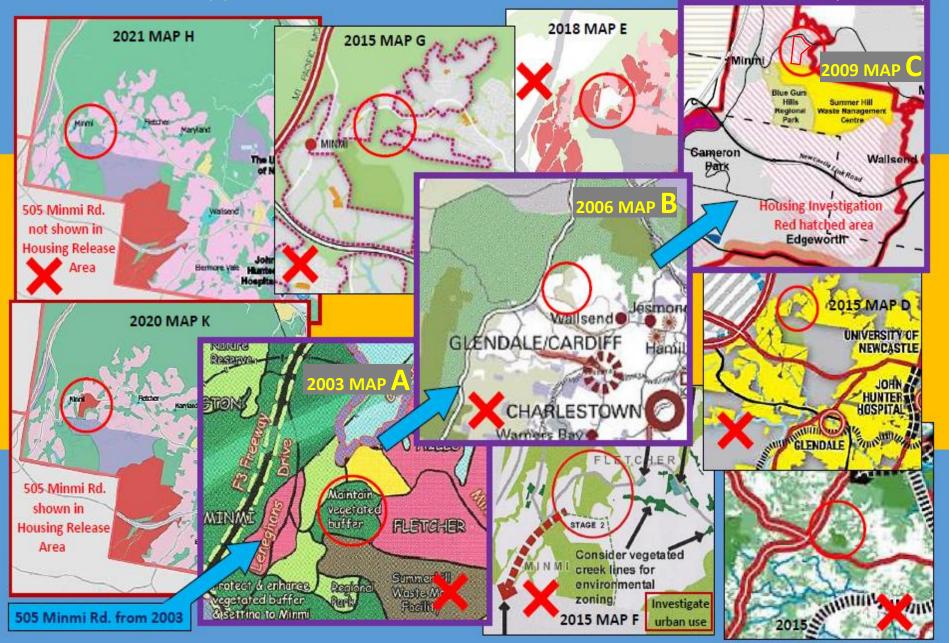
Green Corridor relies on verified mapping in Planning Instruments because this graphical form of information can only be interpreted one way - whereas wording in Planning Instruments may be manipulated and used out of context.

Section 2 contains mapping from Regional and Local Strategies and Plans that helped inform consecutive Newcastle Councils', over the past ten years, that resulted in the refusal of three rezoning proposals.

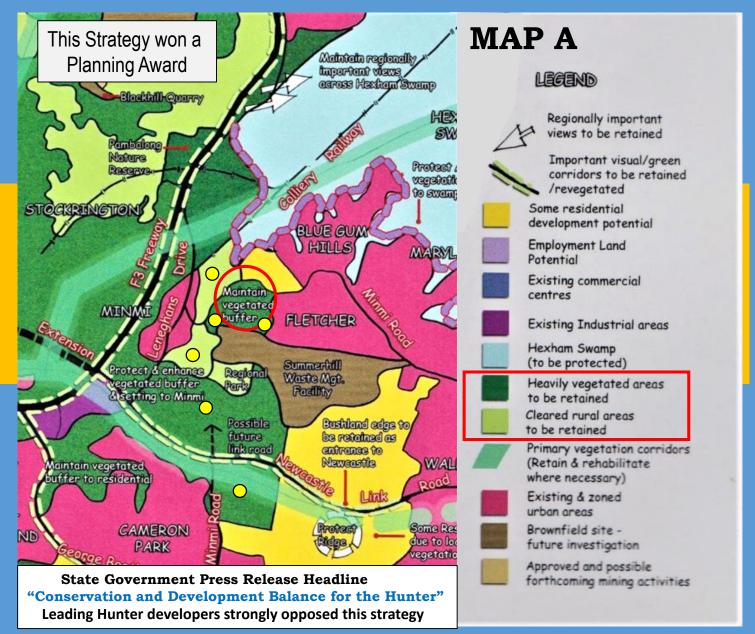
Also one refusal by the Department of Planning and one by the Joint Regional Planning Panel (2017)

505 MINMI ROAD RECORD OF HOUSING IDENTIFICATION

NINE (9) STRATEGIES OR PLANS NOT IDENTIFING SUBJECT SITE FOR HOUSING OR HOUSING INVESTIGATION ONE (1) STRATEGY IDENTIFING SUBJECT SITE FOR HOUSING INVESTIGATION (REFUSED)



DRAFT THORNTON - KILLINGWORTH SUB-REGIONAL CONSERVATION & DEVELOPMENT STRATEGY 2003



Location of 505 Minmi Rd marked by red circle and labelled to be maintained as a vegetated buffer. Mapping shows vegetated buffer lands east of freeway that have been rezoned for residential development O including those around the subject site.

2006 Hunter Regional Strategy and 2009 Draft Western Corridor Planning Strategy

NOTE: Strategy mapping show the subject site is **not** consistent with these strategies as underlined below.

Extract from Council 505 Minmi Rd. Planning Proposal Documents 2009, 2012 & 2015

 Is the planning proposal consistent with the objectives and actions contained within the applicable regional or sub-regional strategy (including the Sydney Metropolitan Strategy and exhibited draft strategies)?

Lower Hunter Regional Strategy (2006)

The Lower Hunter Regional Strategy projects an additional 5800 dwellings within new release areas within the Newcastle local government area. The dwellings will be provided within Blue Gum Hills (Minmi, Maryland and Fletcher), Elermore Vale and Wallsend.

The planning proposal is consistent (see Map B) with the Lower Hunter Regional Strategy, particularly with the following action:

Councils will revise their local environmental plans to be consistent with the dwelling capability projects for their local government area as identified in Table 5 (dwelling capacity projections)

The planning proposal will allow the continued release of additional dwellings within Council's new release areas.

Draft Newcastle-Lake Macquarie Western Corridor Planning Strategy (2009)

The planning strategy anticipates the Western Corridor area will cater for 8000 dwellings, the strategy identifies three main types of preferred future uses within the western corridor:

- Residential
- Employment lands
- Conservation/vegetation buffer

Wording from 2009 Planning Proposal document

The subject site has been nominated as residential and therefore the planning proposal is consistent (refer Map C & text) with the draft strategy.

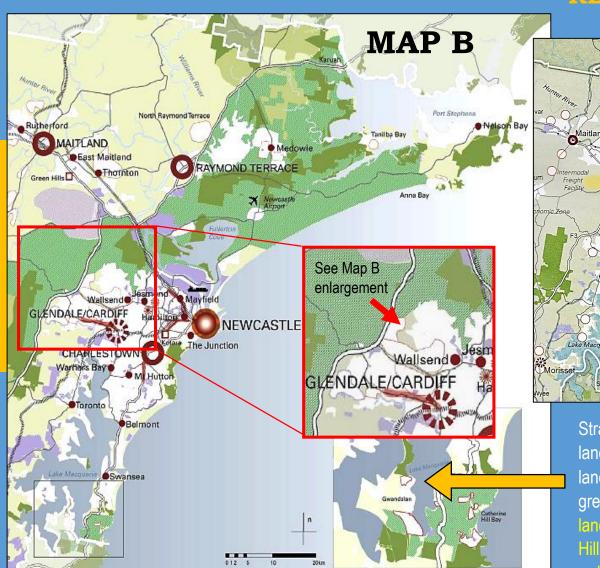
Corrected wording of 2012 & 2015 Planning Proposal document

The subject site has been nominated as residential investigation and therefore the planning proposal is consistent with the draft strategy.

Important planning information is contained in the next five slides.

LOWER HUNTER REGIONAL STRATEGY 2006

DRAFT LOWER HUNTER REGIONAL STRATEGY 2005



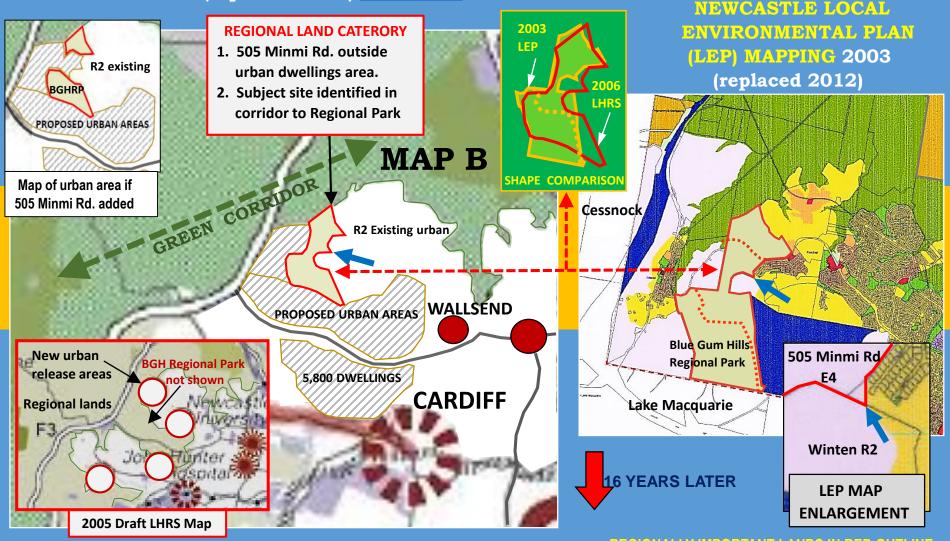
North Raymond Terrace Maitland Thornton Raymond Terrace Tanilba Bay Fullertor Newcastle

Strategy Map B shows "sustainability criteria" lands (Green Corridor) in bright green, with lands of regional importance in light olive green. Newcastle has a small amount of this land category at Nobbys Head and Blue Gum Hills (Fletcher) in far western Newcastle - in red box.

2006 LOWER HUNTER REGIONAL STRATEGY 505 MINMI RD. CORRIDOR MAPPING

LOWER HUNTER REGIONAL STRATEGY
MAPPING 2006 (replaced 2016) -Download-

Land in red outline Map B – LHR Strategy legend states: "Land that provides valuable economic, environmental and social benefits to the region".

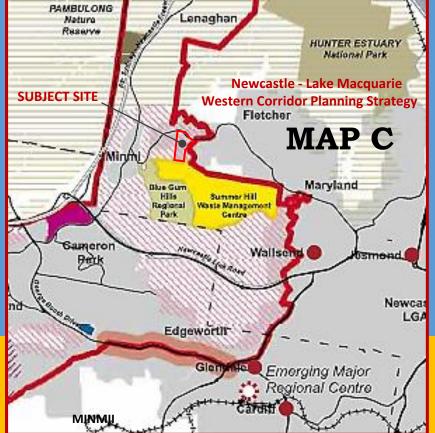


Legal advice was sought and given that "505 Minmi Rd. does not fall in the current urban or proposed urban areas.......As such, the explanation that the Planning Proposal is consistent with the LH Regional Strategy is not supported".

REGIONALLY IMPORTANT LANDS IN RED OUTLINE

- Dan Land Economic (Part 3A "Major Projects")
- 505 Minmi Rd. Social & Environmental
- BGH Regional Park Social & Environmental

2009 DRAFT WESTERN CORRIDOR PLANNING STRATEGY -Download-



The Green Corridor Coalition believes the following to be true and accurate due to relevant documentation and firsthand conformation.

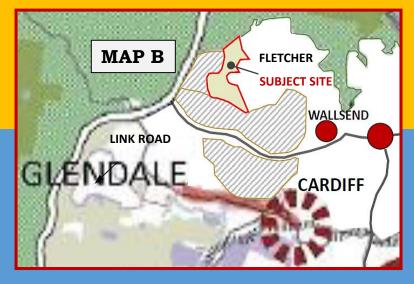
In 2010, the State planning officer who was responsible for the Newcastle-Lake Macquarie Western Corridor Planning Strategy was the same officer who recommended Gateway refusal of the subject site.

The 505 Minmi Rd rezoning refusal shows housing investigation does not mean housing development.

The 2010 State planning department's Gateway refusal letter stated that investigations must determine "......whether, or to what extent, residential development is suitable on this site" and "the maintenance of habitat corridors which will be a determining factor in identifying the extent of any residential development....."

In the 2003 LEP most of the above hatched lands were zoned **7(c)** "Environmental Investigation". No investigations were done despite many council resolutions.

In 2022 these lands (950 hectares) are being developed or are identified for housing development - with the noted exception of 505 Minmi Road (15 hectares developable).



2006 LOWER HUNTER REGIONAL STRATEGY

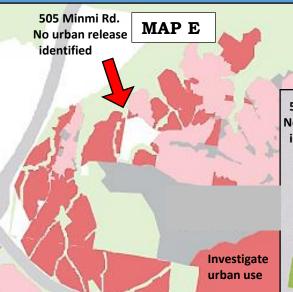
IDENTIFICATION OF WESTERN NEWCASTLE URBAN RELEASE AREAS

GREATER NEWCASTLE METROPOLITAN PLAN Sept. 2018

DRAFT PLAN FOR GROWTH HUNTER CITY Nov. 2015

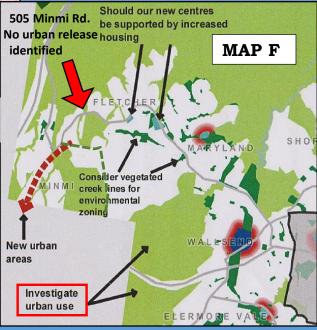


Draft Plan for Growth Hunter City does not identify 505 Minmi Road for urban use - but all other lands are identified for housing or housing investigation.



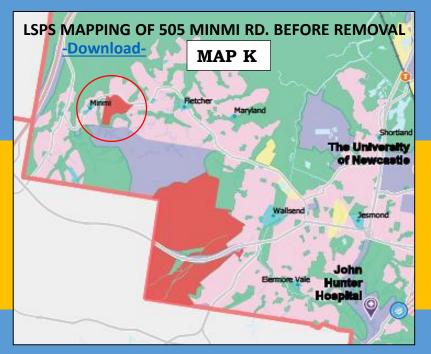
The Greater Newcastle Metropolitan Plan is quoted in the Planning Proposal document and sighted in regard to the Blue-Green Grid (Section 6 Plan 2) and Urban Infill (Section 6 Plan 1) but the proposal is excluded from the mapping because the Council has rejected the site as an Urban Release Area – the site in red box (Maps F & G) is being considered for Urban Release.

COUNCIL PLANNING STRATEGY WARD 4 MAPPING Feb. 2015



Greater Newcastle Metropolitan Plan and Council Planning Strategy do not identify 505 Minmi Road for urban use - with the local strategy Map F showing the subject site in the Blue – Green Grid.

505 MINMI RD. ADDITION & REMOVAL FROM NEWCASTLE LSPS





Extracts from HCCRPP Record of Decision: The Council resolved to not support the Planning Proposal and also resolved to remove the site from the recently adopted Local Strategic Planning Statement (LSPS)......The Panel notes the site's removal from the LSPS was not exhibited.......Notwithstanding the <u>late</u> removal of the site from the Housing Strategy and LSPS.......

- On 10 December 2019, Councillors were briefed on and received a personal copy of the Draft Newcastle Local Strategic Planning Statement (LSPS). No new "Housing Release Areas" were referred to or mapped in their draft copy of the LSPS, including 505 Minmi Rd.
- On 25 January 2020, the draft LSPS was released for public comment that showed 505 Minmi Rd. in a Housing Release Area.
- On 26 May 2020, the LSPS was adopted by Council that had 505 Minmi Rd. in a Housing Release Area but Councillors had written
 assurance that they would be informed if council officers' made any substantial changes to their draft copy of the LSPS.
- On 4 December 2020, Councillors became aware that a new 505 Minmi Rd. Planning Proposal (last PP in 2017) was in the following Tuesday night's meeting agenda and also became aware that the subject site was mapped in the LSPS's housing release area. Council officers have acknowledged this significant error of omission but have downplayed it.
- On 8 December 2020, Council resolved 8 to 2 to again refuse the planning proposal and also voted to remove 505 Minmi Rd. from
 the LSPS because of the council officer's unreported inclusion of the subject site.

Extract from 505 Minmi Road Planning Proposal 2020 Page 11 in reference to the Hunter Regional Plan 2036

The proponent continues to claim that 505 Minmi Road is part of the projected new dwellings when Planning Strategies and Plans show otherwise. Individual sites within a "Growth Area" does not necessarily qualify them for urban development.

The planning proposal is <u>consistent</u> with the following provisions of the HRP: Fact-check Every site in far western Newcastle is consistent with the below Planning Instruments.

Figure 4: Greater Newcastle 2036 (p13): mapped as within a 'Growth Area'

- Figure 11: Greater Newcastle Settlement Pattern (p52): within or adjacent to a Current Urban Release Area' and "Existing Residential Land".
- Local Government Narratives: Priorities for the Newcastle LGA (p68-69): Projected dwelling increase of 16,800 with an action to monitor residential development activity to assist with planning for 6,000 new dwellings.

The following is manipulation of the intent of the "Hunter Regional Plan 2036" that the proponent has used to refer to the site's proposed onsite E2 (undevelopable) gully area. These actions, however, do apply to the whole site's biodiversity corridor values and priority offsets must be used to protect these scientific-width corridor values.

- Direction 14: Protect and connect natural areas. Related Actions:
- 14.1 Identify terrestrial and aquatic biodiversity values and protect areas of high environmental value to sustain the lifestyle, economic success and environmental health of the region
- 14.2 Identify and strengthen biodiversity corridors as places for priority biodiversity offsets
- 14.4 Protect biodiversity by maintaining and, where possible, enhancing the existing protection of high environmental value areas; implementing appropriate measures to conserve validated high environmental value areas; developing local strategies to avoid and minimise the impacts of development on areas of high environmental value and biodiversity corridors; and identifying offsets or other mitigation measures for unavoidable impacts.



Section 3 WILDLIFE CORRIDORS IDENTIFICATION

Section 2 contains mapping from Wildlife Corridor Study that helped inform consecutive Newcastle Councils', over the past ten years, that resulted in the refusal of three rezoning proposals.

Also one refusal by the Department of Planning and one by the Joint Regional Planning Panel (2017)

PROTECTION OF WILDLIFE CORRIDORS HUNTER REGIONAL PLAN 2036

GOAL 2

Page 37

GOAL 3

Page 45

A biodiversity-rich natural environment

The Hunter's diverse natural environment includes some of the most unique ecological systems in Australia. Within the region there are three terrestrial bioregions – the Sydney Basin, North Coast and Brigalow Belt South, and the Hawkesbury and Manning Shelf marine bioregions.

The natural environment sustains important terrestrial and aquatic ecological systems and good habitat connections, including part of a national corridor extending from Victoria to Far North Queensland.

Pristine natural areas are conserved in a network of protected areas, from the World Heritage values of the Greater Blue Mountains to the Port Stephens—Great Lakes Marine Park.

Residents and visitors are fortunate to have ready access to many of the region's natural areas—and an array of unique experiences. These areas contribute to the region's identity and the health of its communities. They are also important for recreational and tourism activities, as a focus for investment and a factor in where people choose to live.

Direction 14: Protect and connect natural areas

Investing in conservation (including biodiversity offsets) that protects, and where possible, enhances habitat connections will deliver multiple benefits to the environment and the community. Investments have already been made in the Green Corridor (identified in the 2006 Lower Hunter Regional Strategy), which is an important link in the Great Eastern Ranges initiative. Identifying other priority conservation areas is also important.

Modelling that identifies habitat connectivity is the first step to identifying and protecting existing habitat links and then establishing new links to support the movement of animals across the landscape.

Many of the region's natural features are already subject to a high level of regulation to protect their environmental values. Strategic land use planning should identify and take account of the location and extent of these areas of high environmental value.

Thriving communities

Direction 18: Enhance access to recreational facilities and connect open spaces

The Hunter has an extensive network of oper space spread across 9,775 hectares of land 1 provides many opportunities for people to experience the environment. Has 2036, the network of recreation facilities, open space a... bushland will extend to form a 'green grid' across the region. Within Greater Newcastle, this means there will be connections between Glenrock State Conservation Area, Blue Gurn Hills Regional Park and Blackbutt Reserve.

Protection and enhancement of forested corridors in Newcastle LGA over the next 15 years

High Environmental Value Vegetation Mapping

Figure 11 - Draft Hunter Regional Strategy 2015



NPWS MINIMUM WIDTH WILDLIFE CORRIDORS

Regional Habitat Corridors – wide enough to have their own ecological integrity including sufficient habitat for resident populations of focal species and interior habitat for species detrimentally impacted by edge effects. Corridors should be in the order of kilometres wide, however, a minimum of 500 metres would be acceptable in certain instances but typically at least 1000 metres width is envisaged. Where ever possible, regional corridors should occupy all available landforms to ensure representation of habitat variation and resources.

Sub-regional Corridors – Wide enough to support resident populations of at least a subset of priority species or wide enough to provide a substantial link between key habitats. A minimum width of 300 metres is envisaged but, where possible, they should be wider (eg. 400 – 1000 metres). They should be positioned to maximise the protection and linkage of available landforms.

Local Corridors – May be narrower than regional and sub-regional corridors (eg. less than 500 metres width). Whenever possible local corridors should link into the wider regional and sub-regional network.

EXISTING LOCAL CORRIDORS (GULLIES) WIDTHS AT FLETCHER

• Minimum width average is approx. 50 meters with an average maximum of approx. 100 meters.

LOCAL CORRIDOR WIDTHS ON 505 MINMI ROAD EASTERN BOUNDARY

• Minimum width is approx.40 meters with an average maximum width of approx. 80 meters.

LOCAL CORRIDOR WIDTHS ON 505 MINMI ROAD WESTERN SIDE (INSIDE WINTEN)

- Minimum vegetated riparian corridor width is approx. zero meters with an average maximum width of approx. zero meters (see Figure 6)
 REGIONAL PARK CORRIDOR WIDTH FOR UNDEVELOPED 505 MINMI ROAD
 - Minimum width is approx. 250 meters with an average maximum width of approx. 350 meters connects a large vegetated area to a regional corridor.

EXTRACT FROM COUNCIL 2005 MEETING PAPERS IDENTIFING A 700 METER-WIDE REGIONAL PARK CORRIDOR

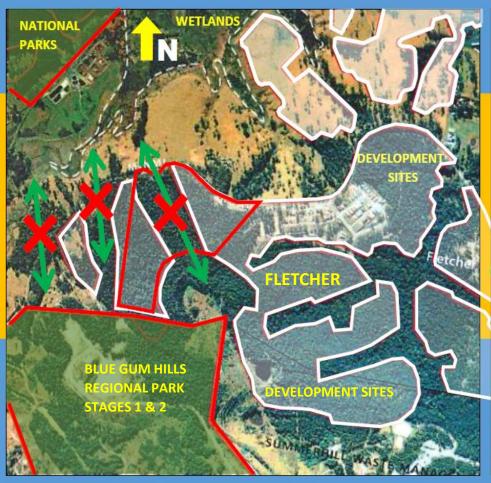
".....In the vicinity of Blue Gum Hills West (BGHW), both Core 1 and Core 2 corridors (see next slide) have been identified in the Umwelt Report. In fact, the entire western half of BGHW (Site B and C) is affected by a Core 2 corridor. This, together with the recommendations of the Thornton- Killingworth Strategy, creates a compelling case for Sites B and C to be rezoned for conservation purposes.

It is noted that Council has commenced work on the rezoning of the nearby Tank Paddock for conservation purposes and it may be opportune for Council to include Sites B and C within BGHW in that process so that the Tank Paddock and Sites B and C are all rezoned for conservation purposes as a package......"

MINMI/FLETCHER WILDLIFE CORRIDORS IDENTIFICATION

Blue Gum Hills Regional Park Corridors by National Parks & Wildlife Service 2000

Council "Minmi Corridor Assessment" by Umwelt Australia 2003 <u>-Download-</u>

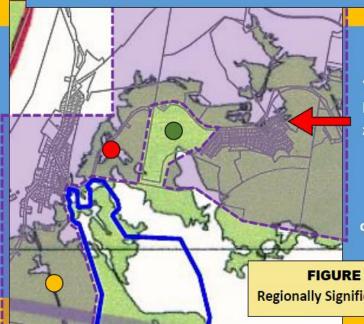


THE GREEN CORRIDOR CORE 1 Council B & C Corridor **FLETCHER BLUE GUM** HILLS REGIONAL PARK

Mapping done in 2000 by the National Parks & Wildlife Service showing corridor connections between the Regional Park and the now National Parks Green Corridor. Mapping shows three corridors running through Coal & Allied lands and 505 Minmi Rd. Since that time nearby Wetlands have been purchased by the government for dedication as National Parks.

Council commissioned a study of biodiversity corridors near Minmi in 2003 which identified a Core 1 corridor with a Core 2 corridor running up to the Regional Park and connecting to other Core 2 corridors. All the Core 2 corridors have been zoned for residential use and 505 Minmi Rd, remains the only possible vegetated corridor left not zoned R2.

EXTRACTS FROM NEWCASTLE COUNCIL "MINMI CORRIDORS ASSESSMENT" 2003



The green filled "Regionally Significant Habitat" not cleared or zoned R2 is outside the light shaded area

All native vegetation currently being cleared from DP lots

FIGURE 4.1 **Regionally Significant Habitat**

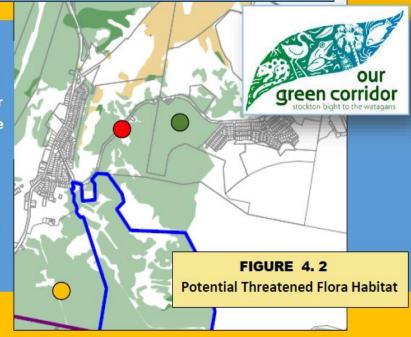
Figure 4



Subject land 505 Minmi Road **All Regionally Significant Habitat**

All native vegetation to be cleared from DP lots

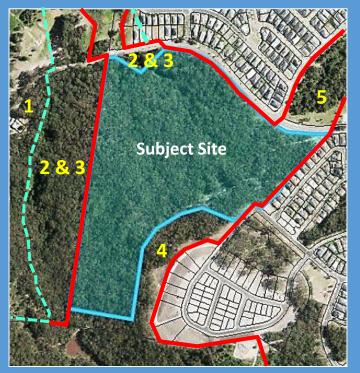
Threatened Fauna Habitats in Newcastle LGA 1





ACTIONS TAKEN BY GREEN CORRIDOR TO MAXIMISE REGIONAL PARK WILDLIFE CORRIDOR WIDTH

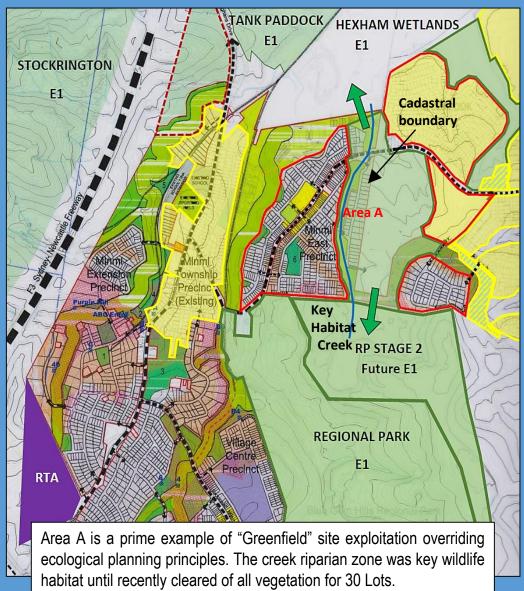
- In 2003, the City of Newcastle council identified a 700 meter-wide Regional Park Corridor lying between Minmi township and 505 Minmi Road. Green Corridor supported this wide corridor, however, in 2012 this somewhat degraded bushland was zoned for residential housing and has recently been cleared of all vegetation.
- 2. In 2005 and 2011, Green Corridor made submissions to the Part 3A State Significant "Dan Land" and Coal & Allied developments bordering 505 Minmi Road, that identified small areas of land that maximised the corridor's entry into the Hexham Wetlands. Subsequently, the opposite happened with both developments being granted maximum development areas. Inexplicably, development was also granted in the E2 Wetlands zone that further decreased the corridor entry width.



- 3. In early 2015, Green Corridor approached Coal & Allied and the owner of 505 Minmi Road with detailed plans that maximised the corridor's width (see next slide). The 505 Minmi Road landowner ejected the proposal outright but Coal & Allied said it may consider it if it was a stickily commercial arrangement (residential rates).
- The Regional Park Wildlife Corridor's width has, by default, been increased over a sizable portion of its length by the inclusion of the mine subsidence E2 zoned land immediately abutting 505 Minmi Road to the east. It has been widely promulgated by council officers that this E2 land on its own is of sufficient width for a wildlife corridor (average width 60 meters).
- If the site is fully secured for conservation the E2 zoned gully corridor in the northern right hand corner will allow access into the main corridor. The current Planning Proposal develops this corner and blocks this "Blue-Green Grid" corridor.

PROPOSED COMBINED COAL & ALLIED - 505 MINMI ROAD REGIONAL PARK WILDLIFE CORRIDOR 2011

COAL & ALLIED CONCEPT PLAN & REGIONAL PARK WILDLIFE CORRIDOR



EXTRACT FROM COALITION SUBMISSION TO COAL & ALLIED CONCEPT PLAN 2011

Green Corridor Coalition (GCC) wishes to bring to the attention of NSW Planning one design feature of C&A's proposed development that results in a large environmental loss for a small increase in development potential (30 Lots). This is the result of the all-too-common practice of working to property boundaries when a development constraint is immediately adjacent.

GCC directs Planning's attention to the enclosed map 'Blue Gum Hills – 2030'. This map featured in a recent Public Voice presented by GCC to Newcastle City Council to demonstrate that a final hour solution to this problem is achievable. Part of the C&A Concept Plan (4.4.3 The Preferred Option) features a narrow strip (averaging less than 100 meters wide) of housing wedged between the creek line riparian zone and the C&A cadastral boundary line common with another private property (505 Minmi Road).

The position of GCC is that this narrow strip of housing (marked as Area A in red) should be removed from the suite of developable lands and redefined as conservation land. Once combined with a proportion of the neighbouring property (505 Minmi Road) a more sound wildlife corridor could be secured.

LOOKING WEST ACROSS 505 MINMI ROAD - HCCRPP E2 ZONE LOCATION "WINTEN" E2 STORMWATER BASINS Points 1, 2 and 3 show these areas exhibit none of the scientific criteria for sustaining a "viable" biodiversity corridor, so it is possible the HCCRPP could have been misled. The Council HCCRPP has abandoned the "viable" long-identified wildlife corridor to the Blue Gum Hills approved Regional Park and instructed Council officers to only pursue development options for this **Detention Basin** wildlife E2 Zone site. corridor E2 Zone The "adjacent" E2 Zone referred to in below (3) The "Nearby" highly-tenuous extract is the creek riparian zone on the western vegetated gullies are biodiversity side of 505 Minmi Rd., which will be fully cleared "dead ends" that link no large of vegetation for stormwater detention basins. vegetated areas. Multiple rezoning refusals 2) The "adjacent" E2 Zone referred to in below 505 Minmi Rd. eastern bounda extract is between the two yellow dotted lines. approved R2 Zone western **Council Blue and Green Grid**

"The manner in which the zone boundaries have been informed by the location of adjacent and nearby E2 zoned land to RECORD OF DECISION maintain the most viable biodiversity linkages to the remaining areas of native vegetation adjacent to the site and in the locality'



Section 4 WILDLIFE HABITAT LOSS VEGETATION EXTENT 1998 to 2022

Nowhere in the "Record of Decision" does the HCCRPP recognise that over the past thirteen (13) years this heavily vegetated site has been the sustained subject of a Wildlife Corridor and Urban Buffer.

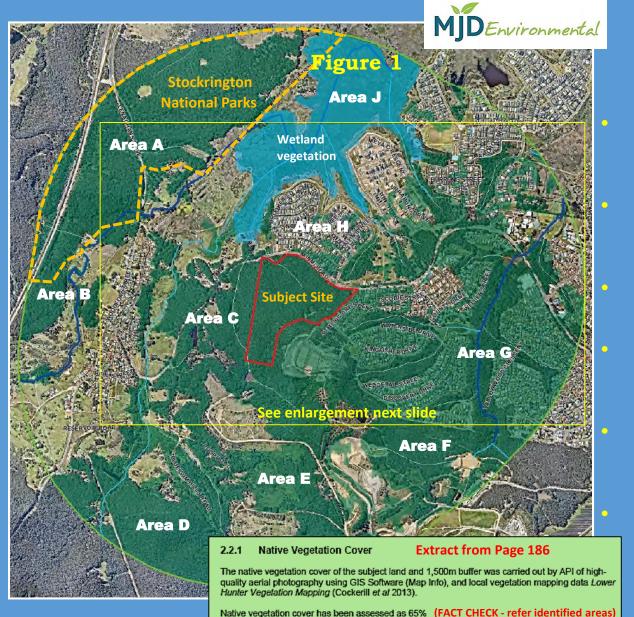
FIGURE NOMENCLATURE

Figure 1 – Shows past and present vegetation extent contained within the green circle shown on Page 187 of the 505 Minmi Road 2020 Planning Proposal Document.

Aerial information in Figures 1 & 2 is taken from this document.

Figure 2 – Zoomed-in view of vegetation extent and R2 development around 505 Minmi Road

ANALYSIS OF NATIVE VEGETATION EXTENT 505 MINMI RD. PLANNING PROPOSAL DOCUMENT'



IDENTIFIED AREAS – Page 187 Fig. 2

AREA A - Tank Paddock and adjoining native vegetation are now in National Parks. Area A was part of the off-set for development of areas B, C & D. Saving of the Tank Paddock's native vegetation is being used to justify clearing of native vegetation and wildlife corridor/urban buffer on the subject site.

AREAS B, C & D – ex-Coal & Allied lands (Winten) all zoned R2 Residential and currently being developed, with the clearing of all native vegetation.

AREA E – Blue Gum Hills Regional Park degraded native vegetation handed over for \$1 by Coal & Allied in exchange for the waiver of rehabilitation liability.

AREA F – Summerhill Waste Facility native vegetation's future is uncertain.

AREA G – Only steep vegetated stormwater drainage gullies not developed, with this R2/RE1 land having little biodiversity corridor/wildlife habitat value.

AREA H – ex-dairy farms that had the native vegetation cleared well over a century ago and have now been developed.

AREA J — Government-owned Wetlands have no like-for-like native vegetation. These Wetlands are being rehabilitated but are also being degraded by urban run-off and other impacts. The continued clearing of native vegetation will accelerate this degrading.

1998 NATIVE VEGETATION EXTENT SUPERIMPOSED ON 2020 DEVELOPMENT Figure **Wetland vegetation** Area J Creek **Subject Site DEVELOPER IDENTIFIFIED CREEK SYSTEM** Area A Area C **Current vegetation** clearing **Actual creek** system EXE DE GROVE Area G **FLETCHER** Area E DISCOVER No green - land cleared before 1998 Area F Light green -- vegetation cleared between 1998 & 2020 250 Dark green - Currently vegetated Meters Light green in dotted yellow - currently being cleared



Section 5 PROGRESSIVE ECOLOGICAL IMPACT OF 2009, 2015 & 2020 PLANNING PROPOSALS

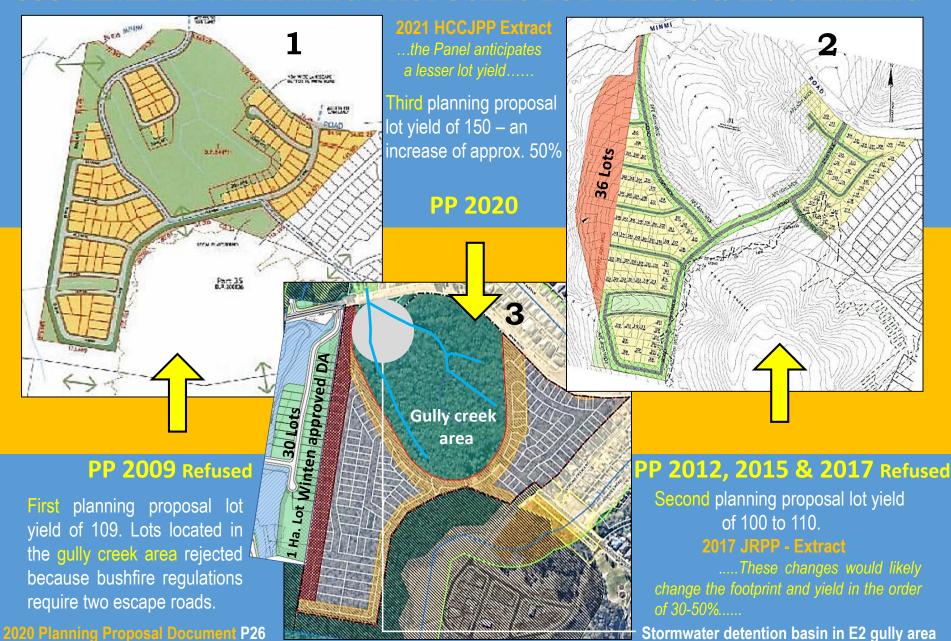
There have been three (3) planning proposals submitted by the proponent since 2009 that have become progressively larger and more ecologically destructive – this is despite the 2017 Joint Regional Planning Panel stating its recommendations would result in a reduction in development size of 30% to 50%.

The proponent's public response was "We're currently working through what we need to do to amend the application so we can meet their requirements".

Inexplicably, the 2020 planning proposal development area increased along with around 50% in the number of lots.

The Panel's Record of Decision did not stipulate a "Stormwater Management Plan"......the installation of the required detention basin would result in the permanent clearing of more E2 Conservation Zone (see next slide).

505 MINMI RD. PLANNING PROPOSALS LOT YIELDS & E2 CLEARING



"Detailed stormwater management planning and design will occur at later stages of the development process, should the land be rezoned".



Section 6 505 MINMI ROAD PROPOSED URBAN INFILL & BLUE AND GREEN GRID

In 2011, Coal & Allied produced the "Concept Plan" for the Minmi/Link Road development and Green Corridor realised the necessity for an urban vegetated buffer between this massive new development and the existing developments to the east. In 2012, a Public Voice was given to Newcastle Councillors titled "505 Minmi Road – Vegetated Buffer and Connecting Corridor".

The latest reason given by the proponent to develop this vegetated "Greenfield" site is urban infill, which was endorsed by the Hunter and Central Coast Regional Planning Panel.

The terms "Urban Infill" and "Urban Buffer" are a perfect oxymoron and therefore Green Corridor registers, in the strongest possible terms, our opposition to urban infill being used to promote this proposed vegetated buffer-destroying subdivision.

505 MINMI ROAD - PROPOSED URBAN INFILL

Urban infill is being used to rezone E4 subject site to high impact use – Urban infill sites rarely require rezoning because of same use

Urban Infill Extract from 2020 Planning Proposal document Page 12

......Strategy 16 of the GNMP 2036 is to "Prioritise the delivery of infill Housing opportunities within existing urban areas." Given the land's current zoning (E4 Environmental Living) and surrounding status, the land should be considered as an existing urban area and hence Strategy 16 should be applicable.........

Extracts from HCCRPP Record of Decision ".....the site's location and alignment with the Hunter Regional Plan and Lake Macquarie Corridor Study as essentially an urban in-fill site (factually incorrect) means that there is utility in considering the site for urban development....' and ".....In considering the strategic merit the Panel notes that the proposal is consistent with.......

Greater Newcastle Metropolitan Plan:

Strategy 16 - Priorities the delivery of in-fill housing opportunities within existing urban areas......"

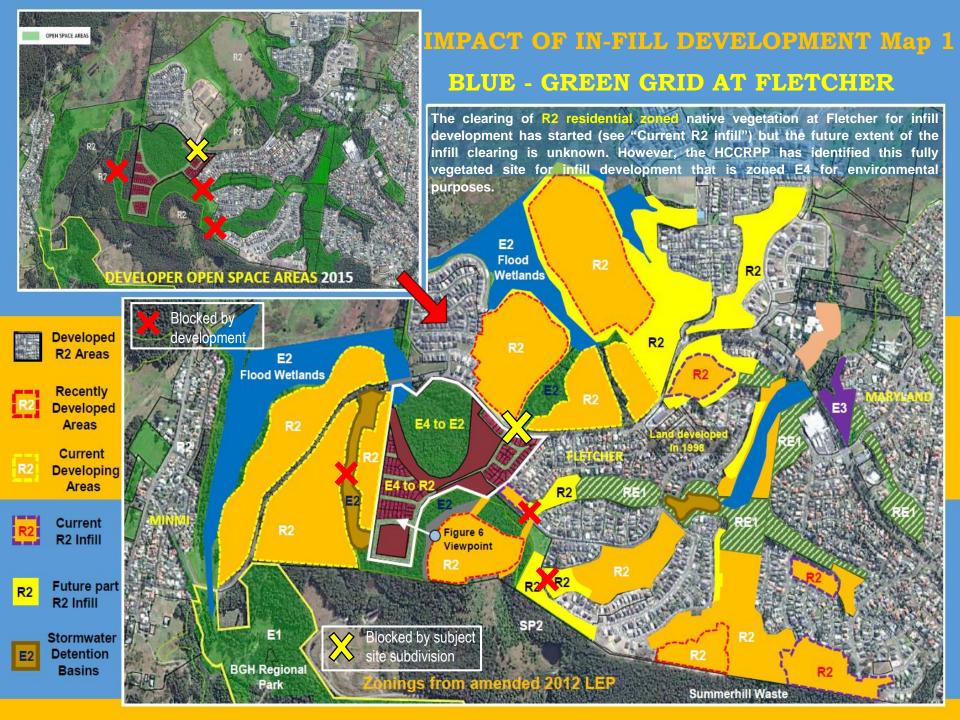
From authoritative source - one of the policy objectives of urban infill is:

"HELP SAFEGUARD LANDS THAT SERVE IMPORTANT ECOLOGICAL FUNCTIONS"

The Regional Park connecting corridor (505 Minmi Rd.) will serve "important ecological functions" so the destruction of these functions by the very thing (urban infill) that is supposed to help safeguard these functions is unbelievable and bizarre. As well, this suburb-softening native bushland serves an "important societal function" as an urban buffer.

In general, Green Corridor supports the housing infill policy but under Strategy 16 Blackbutt Reserve (land with important societal functions) would have been rezoned residential and now be a housing estate with degraded creek riparian zones running through it. In respect to the rezoning of 505 Minmi Road there is a direct comparison which, unfortunately, demonstrates a loss of vision by those who plan our future city.

NOTE: Urban Infill was discussed by councillors and rejected.



Extract from 505 Minmi Road Planning Proposal 2020 Page 12 in reference to the Greater Newcastle Metropolitan Plan 2036

Blue and Green Grid (see Map 2)

The following could be seen as manipulation of the Greater Newcastle Metropolitan Plan 2036

- The planning proposal is consistent with this Strategy and Action as a large portion (less than 35%) of the site is (undevelopable or bushfire restricted) proposed to be <u>conserved in its natural state</u>, <u>which will have strong connectivity to open space corridors external to the site</u> (hyperbole)

Related extract from HCCRPP Record of Decision

"...vehicular access to local services and recreational facilities, including the proposed adjoining Winten subdivision...."

The Winten subdivision layout was changed to conform to bushfire regulations (two escape roads and Asset Protection Zone) which reduced the number of lots – so the proposed vehicular integration would also result in increased lot yield and profits for one or more developers.

BLUE AND GREEN GRID CLEARING & FRAGMENTATION





City of Newcastle "Blue - Green Grid" at Fletcher - MAP 2

Permanent clearing of E2 Blue - Green Grid for stormwater detention basins

All remaining bushland in the area will continue to be severely fragmented by housing development except bushland already in National Parks

The Blue-Green Grid at Fletcher consists of two undevelopable narrow gully drainage lines and one narrow mine subsidence area that are zoned E2. All these are blocked by housing development.

The 300 m. corridor through 505 Minmi Rd. conforms to the recommended minimum corridor width. This is important because this ecological connection has a regionally important destination – the Regional Park.



Section 7 VISUAL AND ECOLOGICAL IMPACTS TO THE LOCALITY

CONCLUSION OF PLANNING PROPOSAL CONSULTANT VISUAL IMPACT ASSESSMENT

"This VIA has found that the combination of landscape and visual sensitivity impacts will be of minor significance".

NOTE: There are other significant visual impacts that were not addressed by the VIA

505 MINMI RD. RIDGELINE LOCATION & SKYLINE BUSHLAND CLEARING

Photo showing ridgeline clearing of E2 zoning outside neighbouring subdivision at the southern end of 505 Minmi Rd. Trees on the right hand side of photo are on the subject site and would be cleared. This ridgeline clearing would extend for 650 meters, with 300 meters being along Minmi Rd. and would be permanent because of houses built on the ridgeline.

ANNIA BVD



Photo showing view looking west along Minmi Rd. at Fletcher, with native bushland on ridgeline in background. This bushland is part of the 650 meterlong skyline clearing.

HCCJPP Extract:The frontage to Minmi Road should retain its landscape character and feel

The Tank Paddock developer coined the term Conservation Subdivision to disguise the true development impact - so the term that is best used to disguise this impact is Facade Subdivision

WINTEN SUBDIVISION BEFORE AND AFTER CLEARING PHOTOS



View of 505 Minmi Road on western slope of hillside and extending to the ridgeline – subject site will be fully visible after the clearing of Winten subdivision is finished

ACCUMMULATIVE VISUAL IMPACTS

When combined with the Winten 1B approved development, all the native vegetation shown in the photo would be cleared from this heavily wooded area. The detention basin (riparian zone) between Minmi Rd. and the access road bridge would be also cleared, leaving only houses between the viewpoint and the ridgeline if 505 Minmi Rd. was developed.



Same Tree



Section 8 PROTECTION OF REGIONAL PARK WILDLIFE CORRIDOR

- Slide 1 shows a proposal for the purchase of the Blue Gum Hills Regional Park Corridor and other issues.
- Slide 2 shows aerial view of Blue Gum Hills Regional Park Corridor flanked by housing development.
- Slide 3 shows the strategic location of 505 Minmi Road.
- Slide 4 are photos taken standing in the middle of 505 Minmi Road that show the true native bushland character of this site; which the developer's planning proposal photos do not.

PROPOSED OFFSET PURCHASE OF BLUE GUM HILLS REGIONAL PARK CORRIDOR AND ASSOCIATED ISSUES



Proposal to rezone 13 to 16 lots R2 Residential

Three issues relating to 505 Minmi Rd.

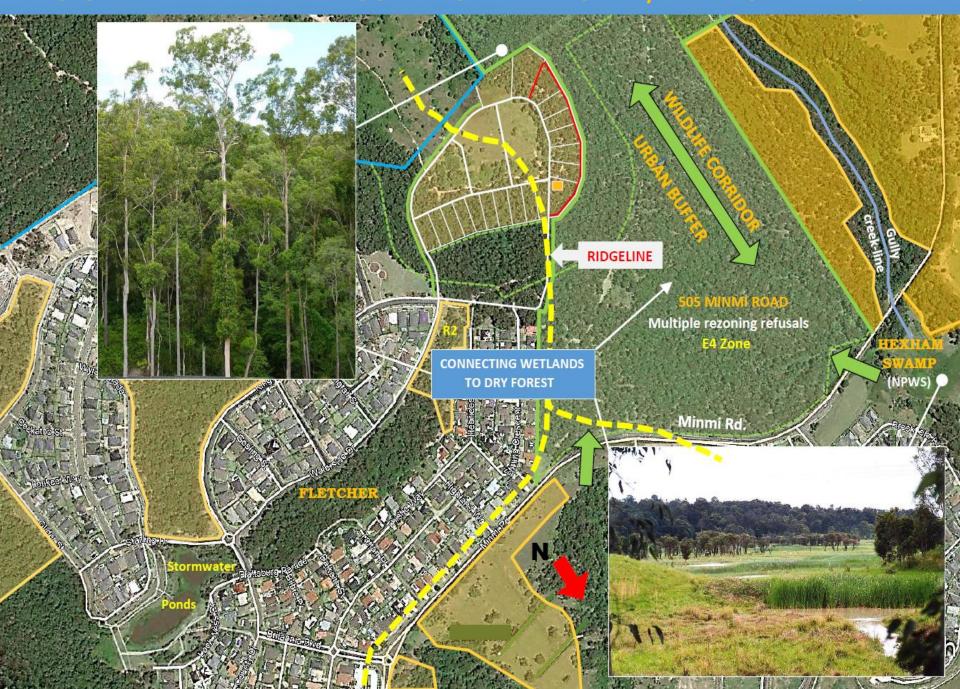
A good proportion of the cost of purchasing E4 zoned 505 Minmi Rd. by the State government and/or Council could be offset by construction of an additional row of houses (13 to 16) to set up an APZ.

Level bushland outlook lots – \$5 to \$6 million at current lot prices

For 25 years the high bushfire-risk ridgeline houses that back onto the 505 Minmi Rd. bushland (left of yellow dotted line) have had no Asset Protection Zone (APZ) to protect against bushfires. This proposal would put the width of the access road and regulation clearing between the new houses and bushland.

This proposal would leave open the access onto 505 Minmi Rd. from the E2 zoned wildlife corridor to the north. This conforms with Council officer's E2 gully corridor planning however they have recommended development on the subject site that would block this "Blue-Green Grid" corridor.

REGIONAL PARK WILDLIFE CORRIDOR - FLETCHER/MINMI URBAN BUFFER



CORRIDOR CONNECTIVITY - THE MISSING LINK







CLOSING STATEMENT

Before development commenced in Newcastle's western urban growth corridor there was a wide swath of native bushland through which Wildlife could traverse to feed and survive but this has now dwindled to near nothing.

Recently a seven hundred (700) meter-wide area of bushland was cleared for housing, which now leaves less than three hundred (300) meters on the Planning Proposal site for Wildlife to access the Region Park and beyond.

Forward planning was done so this point would not be reached but then discarded.

The decision about this "last" Planning Proposal will determine if:

Urban housing will permanently and comprehensibly fragment this "last" connecting bushland environment or

This remnant native bushland and corridor that our wildlife rely on and we all can enjoy is fully retained and protected

This issue is not only about planning but the much broader "Public Interest".

THE OBJECTIVE

The permanent protection of this strategically located E4 zoned native bushland by its acquisition and inclusion in the National Parks Estate

From:

To:

DPE PSVC Hunter Mailbox

Subject: Attn: City of Newcastle Submission - Draft Hunter Regional Plan 2041

Date: Thursday, 3 March 2022 4:53:47 PM

Attachments: <u>image001.jpg</u>

image001.jpg City of Newcastle -Submission - Draft Hunter Regional Plan 2041.pdf

Good afternoon,

I am emailing you regarding City of Newcastle's submission on the Draft Hunter Regional Plan 2041.

Please see attached our submission for full details. If you require further information on this



Regulatory, Planning and Assessment. MBisson/PMcCarthy

Reference: PB2022/01540 Phone: 02 4974 2879



3 March 2022

Department of Planning and Environment
PO Box 1226
NEWCASTLE NSW 2300

Email: hunter@planning.nsw.gov.au

Dear

City of Newcastle submission on the Draft Hunter Regional Plan 2041

City of Newcastle (CN) is pleased to provide its submission on the draft Hunter Regional Plan 2041 (draft Plan). CN supports the big ideas in the draft Plan and coordinated planning for Hunter and Central Coast.

Our submission details our suggestions and recommendations for improvement of the draft Plan. While we support an infrastructure first and place-based framework, there is no detail on how the infrastructure required to support growth will be funded. This is critical to achieving the draft Plan objectives.

CN notes the omission in the draft I Plan of discussion on the importance of a bulk container terminal to the Port of Newcastle, the Hunter Region, and the State. There is a central role for the container terminal in achieving Objective 1: Diversify the Hunter's mining, energy, and industrial capacity.

As the Department of Planning and Environment (DPE) is aware, CN has commenced work on a Place Strategy for Broadmeadow. Broadmeadow is identified as a significant growth area under the draft Plan, subject to a Place Delivery Group planning pathway. We look forward to working closely with DPE on the development of a Place Delivery Group and planning pathway for Broadmeadow.

Finally, while supporting growth, CN recommends strong protection for our green corridors and considers that both aims can be achieved with careful planning.

Thank you for the opportunity to provide comment on the draft Regional Plan. We would be pleased to discuss our submission with you.

should you

require any further information.

Yours faithfully



Attachment: CN submission on the Draft Hunter Regional Plan

CITY OF NEWCASTLE - SUBMISSION - DRAFT HUNTER REGIONAL PLAN 2041

City of Newcastle (CN) generally supports the draft Hunter Regional Plan 2041 (draft Plan), which is a contemporary document that is more in line with community expectations than previous regional plans. While there are many areas of the draft Plan that we support, our submission primarily highlights the areas we believe could be improved and / or expanded.

Contents

CN supports the concurrent preparation of the draft Plan and Transport for NSW's draft Hunter Regional Transport Plan, and its alignment with the Greater Hunter Regional Water Strategy and Lower Hunter Water Security Plan. CN looks forward to the draft Hunter Regional Transport Plan being released for public comment and recommends that this draft Plan is not finalised until it can be considered alongside the Hunter Regional Transport Plan.

CN is a strong supporter of the Sustainable Development Goals (SDGs) as cornerstones for planning and supports the draft Plan's adoption of the SDGs. However, the draft Plan incorrectly numbers the chosen SDGs, for example SDG 1 is "No Poverty", not "Clean Water & Sanitation" as shown in the draft Plan. The SDGs should be reviewed and corrected where necessary.

CN suggests creating an infographic such as the one shown below that CN uses in its strategic documents, which shows the 17 SDGs and highlights the goals the strategic document prioritises.



Coordinated Planning for Hunter and Central Coast

It is not clear in the draft Plan how the Hunter and Central Coast are to be coordinated or how the draft Plan will facilitate "better connectivity within and between Hunter, Greater Sydney and Central Coast essential to sustainable growth" (p. 11). This does not appear to be reflected in the Regional Vision for the Hunter.

Our Regional Vision for the Hunter

The term 'the Hunter' appears to refer to various areas throughout the draft Plan, sometimes it appears to apply to the whole area the draft Plan applies to and sometimes to parts of the area. This is the case, even for the Regional Vision for the Hunter (the Vision).

While over all the Vision is sound, particularly the recognition of the importance of connection to and caring for Country, CN believes it would be improved by including the words 'inclusion' and 'equity' as these are essential components of achieving the connected, vibrant communities the draft Plan is seeking. We suggest the following wording:

"The leading regional economy in Australia, connected to and caring for Country, with a vibrant, inclusive and equitable metropolitan city and sustainable 15-minute neighbourhoods at its heart".

The Vision acknowledges that faster digital technology is making it easier for residents and business to interact and do business in new ways. This is agreed, however, there is a digital divide in our communities which is leaving some people further behind – particularly older people, people experiencing socio-economic disadvantage and people of culturally and linguistically diverse backgrounds. As such, while the digital 'revolution' needs to be encouraged, this needs to go hand in hand with Access, Affordability and Digital Ability considerations as outlined through the <u>Australian Digital Inclusion Index</u>:

Part 1 Making it Happen

Urban Development Program

CN supports an Urban Development Program (UDP) and overseeing committee. However:

- The UDP makes assessments, monitors, and makes recommendations for supporting infrastructure requirements, priorities and coordination but there appears to be no tangible links to securing funding for such works. Public utility providers tend to manage reasonably well with infrastructure planning and delivery at the Development Application / Subdivision Works Certificate stage, however, other government led agencies such as Education and Transport are beholden to NSW Treasury (or the Commonwealth) for infrastructure funding and commitments for delivery cannot/are not made before funding is secured. DPE (Chair of the UDP Committee) has no funding mechanisms other than Special Infrastructure Contributions (SIC) or State Voluntary Planning Agreements (VPAs). It is noted that the Hunter Region SIC has been in draft since 2011.
- The draft SIC is also proving to be severely under-funded as a result of inadequate forward planning. As an example, development of the Urban Release Area at Minmi/Cameron Park, first proposed in 2008 and granted Part 3A Concept Plan approval and land rezoning in 2013, and which is now at DA assessment stage, is likely to require several hundred million dollars of road upgrades along the Newcastle Link Road yet only a small percentage (if any) of this cost will be made up by monetary SICs by developers. A similar situation is unfolding at the emerging Black Hill Catalyst Area.
- The remainder of funding requires financial commitments from Treasury and a representative from Treasury (or the Planning Delivery Unit (p. 20) should form part of the UDP Committee to give early indications on the likelihood (or not) of support for required funding so that delivery timeframes can be determined.
- Clarification is required on whether the UDP Committee will be responsible for securing and dispensing funds and coordinating delivery of infrastructure or whether it the responsibility of each individual agency or the Planning Delivery Unit.
- It is recommended that the UDP Program benchmarks include a 0-1(or 2) Years to review the current draft SIC (last exhibited in 2019) against the draft Plan and adopt a final SIC which the UDP Committee could then monitor and review annually as part of their other annual monitoring

and reporting responsibilities. The draft Plan does not refer to the new Regional Infrastructure Contribution (RIC) Framework. It is recommended that the draft Plan include a schedule of priority regional infrastructure that could be funded through this contribution.

Infrastructure first and place-based framework

The draft Plan should provide more detail on how the infrastructure first concept will be realised.

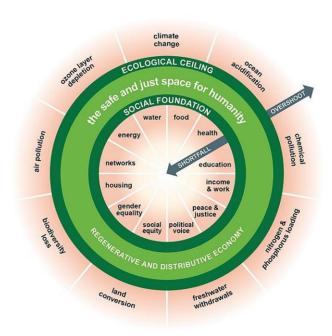
Similar concerns are raised with this section of the draft Plan as were raised with the UDP. While the section notes assessment criteria, prioritisation and sequencing of works to align land use and infrastructure planning and provision, it makes no reference to securing funds. CN's experience is that developers tend to focus solely on delivery of their proposal without regard to the wider Hunter region. Either the UDP Committee or Planning Delivery Unit should take responsibility for informing a developer/land holder if funding is committed or if supporting infrastructure for their development is being prioritised.

Part 2 Objectives

Objective 1: Diversify the Hunter's mining, energy, and industrial capacity

We support DPE's acknowledgement of the need to diversify the Hunter's mining, energy, and industrial capacity. The argument that coal is a finite resource, and the world has begun to change to cleaner forms of energy is sound, however, another essential reason to do this is the need to move away from linear and extractive economies towards more regenerative economies. The draft Plan does reference Circular Economies, which is excellent and strongly supported, but more explanation on why regenerative economies and practices are essential would improve this objective.

CN suggests that this could be linked to thinking such as Doughnut Economics which speaks to the social and planetary boundaries we must respect if everyone on the planet is to survive and thrive. The 'Doughnut of social and planetary boundaries' visualises this balance between our social foundations (ensuring no one falls short on essentials like healthcare, education and food) while also not overshooting our ecological boundaries (by ensuring a healthy climate, biodiversity, clean water and sustainable use of natural resources). Reference: Kate Raworth, Exploring doughnut economics



In supporting the industrial diversification goals of Objective 1 and the interconnectivity goals of Objective 8, it must be noted that the key regional asset in driving that transition is the Newcastle Port, and especially the opportunities of a Container Terminal on that site. The draft Plan should reflect the importance of a Bulk Container Terminal in the achievement of increasing the regional capacity for efficient and sustainable freight movement. There are multiple mentions throughout the document. but not one reference to the central role that a Container Terminal would play in achieving these objectives. In addition, port side rail is very important to consider as a way of ensuring that increasing port activity can be serviced by

rail that is not disruptive to our suburbs.

Objective 2: Ensure economic self-determination for Aboriginal communities

It is stated on p. 27 that, "Many Local Aboriginal Land Councils have successfully activated and utilised the economic potential of their land by forging working relationships with councils, state agencies and development partners". CN agrees with this statement but would add "non-government organisations/community organisations" to this list of stakeholders that LALC's have (and can) form working relationship with to support an economic benefit that sits more in the social enterprise domain.

Page 28 states that, "The NSW Government is committed to improving the economic self-determination of Aboriginal communities in NSW." CN applauds this commitment and recommends that it be expanded to demonstrate why improving self-determination is important, for example, the draft Plan could include statistics on the disparities between the socio-economic position of Aboriginal and Torres Strait Islander people and non-Indigenous people.

CN welcomes DPE evolving how it shares knowledge with Aboriginal people to create more effective relationships (p. 28 Strategy 2.3). However, it is also important that this knowledge sharing occurs both ways. CN recommends that the draft Plan demonstrates DPE's intent to not only improve how it shares knowledge, but also improve how it learns from Aboriginal communities and leaders to further strengthen this strategy approach.

Objective 3: Create a 15-minute region made up of mixed, multi-modal, inclusive, and vibrant local communities

In outlining the public interest in accomplishing a 15-minute region, reference should be made to its contribution to social capital and social cohesion. 15-minute neighbourhoods can assist in creating greater place-based connections, with people participating in and feeling connected to community life. This in turn contributes to social capital – that is, social relations that have productive benefits for the community, which is an outcome of community engagement and capacity-building processes.

Strategy 3.3 states that Councils may partner with School Infrastructure NSW on a school facility, such as a hall, library, or sporting facility, for joint use. CN recommends that this be supported by an action for State government to facilitate this partnership.

Strategy 3.4 seeks to facilitate a shift towards the 15-minute neighbourhood which is a positive step towards making our communities more liveable and less car dependant. However, the tools to achieve this and create good public places are limited. This is partly due to the Employment Zones Reform and other existing SEPPs or the Standard Instrument Order, which permit uses such as health service facilities and childcare centres to occur in an ad hoc manner.

The Employment Zone Reform will combine the B1 Neighbourhood Centre and B2 Local Centre zones of the NLEP 2012 into the new E1 Local Centre zone.

This will introduce new land uses such as specialised retail premises, which are generally not consistent with the scale or character of existing B1 Neighbourhood Centres.

It will also result in service stations becoming a mandatory land use in these locations. CN is concerned that introducing the E1 zone into existing low density residential areas may have unintended impacts on the amenity of such neighbourhoods and not achieve the desired intent of the 15-minute neighbourhood, depending on the land uses proposed. For example, a specialised retail premises is unlikely to provide for the daily needs of residents.

Retrofitting existing low density residential areas to 15-minute neighbourhoods may be best achieved by applying an employment zone to small pockets, thus allowing for activity nodes to form within them and low-rise medium density residential development to occur around them. This would also allow CN to focus infrastructure and public domain investment more efficiently in the future or as they grow. Forming activity nodes and maximising their 15-minute walking or cycling catchments allows people to make one trip to access most of their daily needs rather than travelling 15 minutes one way to access a service and 15 minutes back the other way to access another.

Land uses such as health service facilities and childcare centres are permitted in most residential zones either as prescribed uses under the Infrastructure SEPP or mandated uses in the Standard Instrument Order. These are important uses which many people need to access frequently.

CN does not dispute the need for them to be permissible in such zones. However, this may create a challenge for the creation of 15-minute neighbourhoods, as these uses may be dispersed and disconnected.

CN recommends that the draft Plan elaborates on how 15-minute neighbourhoods are created to build activity nodes within existing neighbourhoods and that the draft Plan includes an action for DPE to develop a mechanism that supports the creation of these nodes to achieve 15-minute neighbourhoods.

Objective 4: Plan for "Nimble Neighbourhoods", diverse housing and sequenced development Optimum density

Strategy 4.1

The introduction of the term 'urban density' and the method of calculating it, using the combined number of residents and workers within an area, requires clarification. Greater certainty is required to calculate density as well as clarification on what is considered developable land. Earlier drafts of the Plan identified calculation of net residential density, which is an accepted planning mechanism

It is not clear how the minimum of 50-75 dwellings per hectare will be applied. Housing as complying development does not necessarily trigger a council's involvement and Landcom developments do not always achieve this on greenfield sites in the Hunter. This will need more direction and possibly modelling in areas where it can be achieved to assist and encourage its take-up.

The draft Plan states that 'more density than this range, if supported by contextual analysis and access to public open space, should be supported.' While access to public open space is important, access to other places and uses may also create successful communities. It is suggested that more detail be provided on the contextual analysis required for delivering a successful community.

It is difficult to imagine what 50-75 dwellings in a hectare would look like or how it would fit with open or community space. This seems too dense for anything outside of tall CBD towers.

The claim that effective public transport relies on this density should be supported with evidence and clarification of assumptions, for example does this assume a public transport system that makes a profit? This would seem unnecessary for good urban planning given the many benefits to helping people to move away from being car dependent.

Small scale renewal

CN supports innovative housing solutions, but strategy 4.3 could be expanded to also include cooperative housing. Barriers or helpful direction regarding these housing types should be considered at a state level.

DPE could expand on this strategy by facilitating a regional design competition to showcase innovative housing solutions that respond to 'Nimble Neighbourhoods' and the '15-minute neighbourhood' within the context of the Hunter. This could then be replicated throughout the Region to achieve the objectives of the draft Plan.

Regional housing benchmarks

Across the region it is stated that a range of housing types is needed – including affordable, diverse, and accessible. To support the directions about affordable and diverse housing, photos and videos showing how good infill can work could be provided, with assistance from the NSW Government Architects. These photos/illustrations could show how affordable housing can be well integrated and include real examples.

General comments on housing

The aspirations for nimble neighbourhoods, diverse housing, and sequenced development, need clear implementation actions. DPE could support councils by coordinating monitoring methods for housing diversity across the region and by providing messaging for how to achieve better infill and proposed densities and diversity.

The draft Plan should tie in with NSW Government's Housing 2040 and the related actions in Housing 2041 Action Plan which proposes to work across government levels for better housing outcomes, for example, Plan Priority Area 5 proposes working with local governments and communities to achieve the NSW Government housing objectives including partnerships for affordable housing, sharing data, support in preparing Affordable Housing Contributions Schemes.

Objective 5: Increase green infrastructure and quality public spaces and improve the natural environment

CN supports this objective and the strategies and actions to achieve it.

Objective 6: Reach net zero and increase resilience and sustainable infrastructure

The objective to reach net zero and increase resilience and sustainable infrastructure is welcomed. The predicted increases in temperature in the Hunter are of key concern, especially for vulnerable community members such as the elderly, people experiencing homelessness or those living in housing which is not adapted to high temperatures. CN recommends that specific strategies be outlined to respond to the issue of increasing temperature.

CN recommends that more planning is done around the transition to electric transport. Finding ways for residents to charge their electric vehicles, particularly those that don't have off street parking will be important to encourage people to switch. A State based planning approach to this issue would be helpful. In order to help our homes to electrify completely, State regulation should assists households to change their appliances, cooking and heating to electric and to assist with making existing homes more energy efficient.

CN is aware of a proposal to make the region a renewable energy industrial precinct. The draft Plan should acknowledge the potential for these types of development in the region.

Objective 7: Plan for businesses and services at the heart of healthy, prosperous, and innovative communities

This objective should encourage the consideration of inclusion of community wealth building into pages 53 – 54 (what we need to accomplish and why). Community wealth building is an approach to economic development that aims to create an inclusive, sustainable economy.

CN is considering how community wealth building can be incorporated into its economic development approach and the City of Sydney have just released a <u>Discussion Paper on</u> this approach that may be of relevance.

More information can be found on the Community Wealth Organisation website.

The draft Plan does not articulate the current skills shortages facing the Hunter Region. Less than 50% of our population have post-school qualifications, while 90+% of future jobs are expected to require post-school qualifications. This objective should be accompanied with a region-wide plan to develop local skills and attract people to the region who are highly skilled. The objective title could be renamed 'Plan for highly skilled people at the heart of healthy, prosperous and innovative communities'.

The COVID-19 pandemic has led to a significant increase in people working remotely, often connected to employment in Sydney, Melbourne, or other global cities. There is an opportunity for the Hunter Region to attract remote workers due to the advantageous lifestyle our region offers. Similarly, region-wide strategies could be implemented to integrate remote workers with the local professional ecosystems.

Health care and education services

Strategy 7.5 does not appear to be a strategy, but a list of actions done previously. Health care is an important part of the Hunter's economy and service and should be better integrated with the strategy. Similarly, education and child-care are very important to a functional and successful community and direction is needed in these areas.

Objective 8: Build an inter-connected and globally focused Hunter

While infrastructure is mentioned throughout the draft Plan there is very little in the way of strategy in this objective. It would be a positive step to have an action to work towards a cross government approach led at State level.

CN recommends further exploration is carried out in how we can create more jobs and have a stronger economy.

Part 3 District planning and growth areas

District-level planning priorities should include those catalyst areas in the Metro plan and the renewal areas that are capable of supporting the densifying urban form through infill as envisaged by the draft Plan - specifically, Kotara and Callaghan, and the Mayfield and Adamstown renewal corridors.

The housing growth anticipated for the Airport Special Activation Precinct (SAP) needs to be coordinated regionally – several of the identified growth areas are outside of the Newcastle LGA but will have direct implications for Newcastle in terms of the pressures on social infrastructure and services.

Key impediments to the achievement of greater inner-city density in Newcastle require strategic planning at the State level but are insufficiently articulated in the draft Plan. Specifically, urban densification in Wickham is constrained by extensive mine subsidence and the presence of incompatible industrial infrastructure (fuel storage and pipelines). These issues cannot be resolved at a Local level and require strategic intervention from the Government in order to be resolved, again to meet the aspirations of the urban form promoted by the draft Plan.

Broadmeadow growth area

General comments

The heritage assets identified under the Broadmeadow growth area should explicitly reference the Broadmeadow Locomotive Depot as a key heritage asset.

Figure 9, p. 70 has the following inaccuracies:

- Alignment of train line (adjacent to Maitland Rd) out of place
- McDonald Jones Stadium and Centre of Excellence listed incorrectly in legend

CN raises concern that Figure 9 includes indicative light rail stop locations as these have not been confirmed. Similarly, showing the light rail corridor terminating at Hunter Park should be amended. The figure should show an indicative corridor for light rail either through or around Hunter Park with the opportunity for future extensions to John Hunter Hospital or University of Newcastle Callaghan Campus.

Sustaining regional habitat connectivity

Council supports strong protection for the Green Corridor in the draft Plan. This is consistent with multiple resolutions of the Council over the last 6 years, including the resolution at the November ordinary meeting to reiterate our "commitment for the protection of the Green Corridor and the prevention of intensive urban development in the Corridor vicinity [and] endorses and advocates for

the greater recognition and permanent protection, including through the inclusion of the remaining unprotected areas of the Green Corridor in the reserve estate, in the regional plan review.

Council's full resolution is provided as Attachment A.

Further, urban release in the Green Corridor is entirely inconsistent with the urban form envisaged under the draft Plan in terms of density and the goals of accessibility and liveability as per the 15-minute city model.

Appendices

Appendix A: Centres

Beresfield / Tarro should be included in the 'significant employment land clusters' table.

Appendix C: Infrastructure first and place-based delivery

CN supports DPE focussing on delivering the regional plan through improved alignment of infrastructure, planning and collaboration across government through the Place Delivery Group (PDG). The PDG must include representatives from all relevant State agencies and utility providers, such as Hunter Water and Ausgrid, to allow all infrastructure to be considered simultaneously by the group when planning for growth areas. The PDG must facilitate efficient and effective decision-making by providing certainty to the provision of infrastructure in planning for precincts. CN has concern that the PDG will have difficulty achieving this as most State agencies are unable to provide a commitment to infrastructure provision unless there is funding available.

Broadmeadow is identified as a 'significant growth area' subject to the PDG planning pathway. CN is preparing a Place Strategy for the wider Broadmeadow area incorporating the Catalyst Area identified in the GNMP 2036. A key component of the Place Strategy will be producing a structure and sequencing plan which ties together infrastructure provision and changes to planning controls. This project has commenced, and CN has been liaising with State agencies throughout this process via the Newcastle Catalyst Area Streeting Group. The Hunter Park business case is expected to be delivered in late 2022-23. Further information regarding structure, governance, and processes relating to the PDG are required as soon as possible to ensure that the PDG can support the Broadmeadow Place Strategy project, and related projects in Broadmeadow such as Hunter Park. This will provide greater certainty of the process for planning in Broadmeadow.

In December 2021, the Premier announced Hon. Rob Stokes MP would become the first Minister for Cities and that the Greater Sydney Commission would become the Greater Cities Commission, now including Newcastle. Clarity regarding the involvement or relationship between the Greater Cities Commission and the Hunter Regional Plan (including the PDG) and GNMP is required to understand the influence this change to NSW Cabinet will have on Newcastle and the Region.

Attachment A

THE CITY OF NEWCASTLE Notice of Motion

Page 1

Agenda Report

SUBJECT: NOM 23/11/21 - PROTECTING THE GREEN CORRIDOR

RESOLVED: (Councillors Mackenzie/Elliott)

That the City of Newcastle

- Notes that the Hunter Regional Plan, a 20-year strategic planning blueprint for the future of the Hunter region, is currently under review by the NSW Department of Planning, Industry and Environment, in order to extend the plan to 2041 and to reset priorities.
- Notes that the 2006 Lower Hunter Regional Strategy established the 'Green Corridor' an intact ecological corridor that links the Watagans and Yengo National Parks with the coastal plains of the Tomago Sand beds, Stockton Bight and Port Stephens. City of Newcastle further notes that the protection of the Corridor recognised the importance of large vegetated areas being linked via habitat corridors at a landscape scale.
- Notes the regional conservation value of the Corridor was reiterated in Hunter Regional Plan 2036 (2016) and the Greater Newcastle Metropolitan Plan 2036 (2018), although being redesignated in the latter as the 'Blue and Green Grid'.
- 4 Notes the directive for Greater Newcastle Councils issued in the Greater Newcastle Metropolitan Plan 2036 to "prevent intensive urban development in the Blue and Green Grid" (p35).
- 5 Reiterates its commitment for the protection of the Green Corridor and the prevention of intensive urban development in the Corridor vicinity.
- 6 Endorses and advocates for the greater recognition and permanent protection, including through the inclusion of the remaining unprotected areas of the Green Corridor in the reserve estate, in the regional plan review.

Document Set ID: 7201751 Version: 1, Version Date: 24/11/2021 From:

To: DPE PSVC Hunter Mailbox

Subject: Submission - Draft Hunter Regional Plan 2041

Date: Friday, 4 March 2022 12:26:00 PM

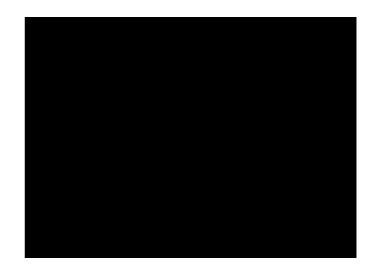
Attachments: <u>Draft Hunter Regional Plan submission 040322.pdf</u>

Hi

Please see attached my submission to the draft Hunter Regional Plan 2041 currently on public exhibition.

Can you please acknowledge that you have received this submission?

Thanks and kind regards,



Department of Planning and Environment

hunter@planning.nsw.gov.au

Dear Sir/Madam

<u>Submission – Draft Hunter Regional Plan 2041</u>

I wish to make a submission in relation to the draft Hunter Regional Plan 2041 currently on public exhibition.

Regional plans are important in providing long term context and direction for land use. Most importantly, these plans need to integrate settlement patterns with land use, transport and other service infrastructure. To be effective, regional plans must:

- 1. Identify priority issues to be addressed in land use planning.
- 2. Be based on effective community consultation and appropriate data.
- 3. Provide guidance on how priority issues are to be addressed in future local planning and investment by articulating objectives, principles and governance arrangements for decision-making.
- 4. Clearly articulate actions that will implement the objectives

It appears that the draft Hunter Regional Plan 2041 has emerged from an opaque process that discarded the current Hunter Regional Plan 2036 prepared about 5 years ago with hardly a reference or apparent review. A less than 5 year life for a plan with 20+ year timeframes intended to guide future land use and investment is problematic.

Strategic land use planning is about what happens where, and why. Regional plans should both identify long term directions and priorities, and provide the context for making decisions that will affect the community forever. Economic costs, quality of life impacts and management implications of not planning effectively will be substantial and ongoing.

What is needed to achieve the proposed "big ideas" in the draft Hunter Regional Plan 2041 is not clear. How will "the guiding principle" of net zero carbon emissions be applied in all planning decisions when the only solutions offered are to improve community resilience to hazards, and to improve air quality?

Much is missing from the draft Hunter Regional Plan 2041, nothing more than a complementary regional transport plan. Public transport improvements required for functional and uncongested urban areas should be identified, such as a new railway station for Maitland Hospital, a Glendale interchange, and the protection of future transport corridors.

Mitigating carbon emissions requires a focus on integrating land use and transport, and limiting land use to prevent clearing of native vegetation and water catchments. Protecting biodiversity, expanding conservation reserves and protecting habitat corridors is also of the highest priority. Future water availability limits how land is used and deserves more prominence. Effective guidance in the location of renewable energy infrastructure is also required.

Above all, appropriate objectives and guiding principles for future land use planning are urgently needed in the regional plan that effectively integrate priority issues for the future use of land and natural resources especially water, transport, agricultural land, and protection of regional biodiversity values.

These matters need to be taken into account in finalising the Hunter Regional Plan.

Thanks for your consideration of this submission.

Yours sincerely



From:

To:

DPE PSVC Hunter Mailbox

Cc:

Subject: Submission to Draft Hunter Regional Plan 2041 - Proposed business land at Thornton

Date: Friday, 4 March 2022 1:48:05 PM

Attachments: image001.png image002.gif

Brickworks Road, Thornton - Submission on Draft Regional Plan.pdf

To Whom It May Concern,

Thank you for the opportunity to comment on the Draft Hunter Regional Plan 2041.

The attached submission is made on behalf of several parties who are substantially progressed in the rezoning of 48.66 hectares of land at Thornton from RU2 Rural Landscape to B5 Business Development and C3 Environmental Management. It is our submission that the Regional Plan must recognise the strategic merit of the rezoning by mapping the site as 'Proposed business' within Figure 11 of the Plan. The rezoning has the potential to generate significant employment opportunity and stimulate economic activity within proximity to existing transport corridors consistent with draft Hunter Regional Plan 2041 objectives. The site is identified as an Urban Release Area in the relevant planning proposal and has the potential to unlock improvements to services, utilities and transport infrastructure. The site's recognition within the final Regional Plan will strengthen community, agency and infrastructure provider confidence in the proposal and ensure this important strategic opportunity becomes a reality.

I will be in touch with you for further discussion in the coming days. Kind regards,



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OUR REF: 10576

4 March 2022

NSW Department of Planning and Environment

PO Box 1226 NEWCASTLE NSW 2300

Draft Hunter Regional Plan 2041 RE: Brickworks Road, Thornton

This letter is in submission to the Draft Hunter Regional Plan 2041 currently being exhibited for comment.

de Witt Consulting has prepared the submission on behalf of several parties who are substantially progressed in the rezoning of a total of 48.66 hectares (ha) of land. The land and representatives are identified in Table 1 and Figure 1.

Table 1: Land subject of this submission

Address	Property Description	Representative
1 Brickworks Road, Thornton	Lot 161 DP136183	North Thornton Group
51 Brickworks Road, Thornton	Lot 15 DP10419 and Lot 14 DP1078459	Lion Civil
18 Brickworks Road, Thornton and 329 Raymond Terrace Road, East Maitland	Lot 282 DP852771 and Lot 462 DP870019	Stevens Group





Figure 1: Subject land (Source: LPI NSW Imagery 2020

The rezoning is substantial in terms of land area and opportunity. It is supported by Maitland City Council (MCC), having been the focus of robust planning assessment by Council staff over a period of four years and endorsed at the Ordinary Meeting of MCC on 9 March 2021. The rezoning is subject of a Planning Proposal (Ref: PP-2021-4404) prepared by MCC and submitted to Department of Planning and Environment (DPE) for Gateway Determination in July 2021 and subsequently resubmitted with additional information in February 2022. As such we believe that the final Regional Plan should reflect this proposal as the draft does not currently do so.

Below is a summary of the history of the proposal for rezoning and its current progress as well as justification as to why the Regional Plan should reflect this significant proposal.

1. Description of the proposals

The proposal involves the rezoning of approximately 48.66ha of land at Brickworks Road, Thornton from RU2 Rural Landscape to B5 Business Development and C3 Environmental Management (formerly referred to as E3 Environmental Management).



The intent of the rezoning is to allow for a diverse range of employment generating developments, as well as the protection of environmentally valuable land. The proposed amendment to Maitland LEP 2011 will enable the site to be developed for a mix of business and warehouse uses, as well as specialised retail premises that require a large floor area. It will also protect existing vegetation on the site, maintaining strategically important biodiversity corridor linkages.

An additional permitted use, food and drink premises, is proposed within 1 Brickworks Road pursuant to Clause 2.5 and Schedule 1 of Maitland LEP 2011. It is intended that the proposed additional permitted use will activate the site, support other uses and provide a place for visitors and nearby residents to socialise and interact.

The proposed amendments to MLEP 2011 are described in further detail below:

- Amend the Mineral Resource Area LEP Map (Sheet MRA_006A), as the site and additional lots will no longer be used for extractive industries and therefore is no longer an 'identified resource';
- Amend the land zone LEP map (sheet LZN_004D and sheet LZN_006A) to rezone land that is currently RU2 Rural Landscape to a land use configuration including B5 Business Development and C3 Environmental Management;
- Amend the minimum lot size LEP map (sheet LSZ_004D and sheet LSZ_006A) to amend the minimum lot size controls for the site, a 40ha minimum lot size will be applied to land zoned C3;
 and
- Amend the urban release area LEP map (sheet URA_004D and sheet URA_006A) to identify
 the site as an urban release area.

2. Background of the proposals

The proposal began as three separate rezoning applications that were submitted in the following order and not at the same time:

- 1 Brickworks Road, Thornton February 2018
- 51 Brickworks Road, Thornton August 2019
- 18 Brickworks Road, Thornton and 329 Raymond Terrace Road, East Maitland October 2019

As you can see the proposals have been under assessment for up to four years.

Since lodging separate applications, the proponents have entered into a phase of collaboration, intent on the delivery of employment generating land and associated projects within the precinct. Consideration of the site as a whole therefore began to take place with a concept master plan being developed (shown in *Figure 2* below).



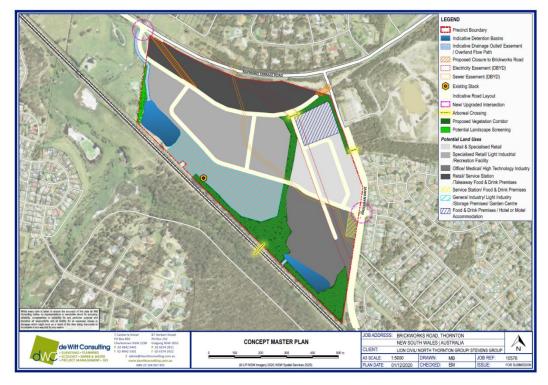


Figure 2: Concept Master Plan (Source: de Witt Consulting)

Alongside this, support for the proposal has emerged from within the senior staff at Maitland Council and from the body of elected Councillors. There has been renewed focus on the proposal by senior planning staff with key changes including improved flow of communication and a fundamental show of support by staff expressing sentiment to progress the proposal.

The planning proposal identifies the site as an urban release area. Therefore, the site will attract regional contributions and play an important role in the delivery of infrastructure such as upgraded services, utilities and transport connections.

At the time of writing this submission the proposal is under assessment by DPE staff for Gateway Determination.

3. Changes sought to the Regional Plan

As will be explained below, the proposal is consistent with all the relevant strategic plans for the area. We ask DPE to maintain this consistency in the new Regional Plan. In particular, that the site be identified as 'Proposed business' within Figure 11 of the Plan. As can be seen from the extract of Figure 11 from the Draft Plan on exhibition below, the site (circled in red) is not properly recognised for its significance.



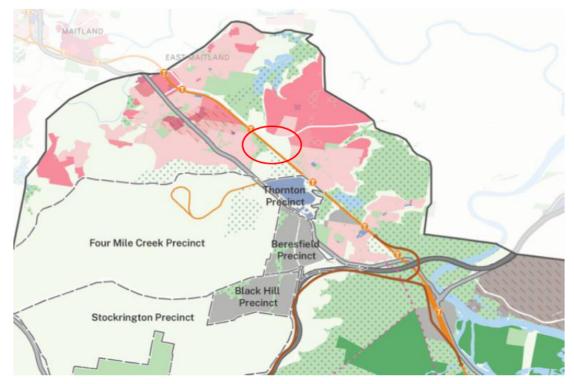


Figure 3: Map referred to as Figure 11: National Pinchpoint (Source: Draft Regional Plan 2041)

4. Reasons for the changes

The site is strategically located in an area with surrounding population growth and has accessibility to transport routes to facilitate movement of goods and services. In addition, the site has connection to existing infrastructure and services. This makes it ideal to be classed as 'Proposed business'. The size and scale of the proposed future use then is of significance enough to warrant its inclusion in the Regional Plan.

Further, as mentioned above, the proposal is entirely consistent with the relevant strategic plans for the area. They are as follows:

Hunter Regional Plan 2036

The planning proposal is consistent with the outgoing Regional Plan's goals as it will create additional employment land to strengthen and diversify the economy, protect, and maintain areas of biodiversity value, support existing communities and provide jobs for the growing population.

Greater Newcastle Metropolitan Plan 2036

The proposal is consistent with the Metropolitan Plan (particularly Outcome 1), as it will provide additional employment land adjoining a growing and existing urban area, providing convenient access to jobs and services for the rapidly expanding surrounding communities.

Maitland Local Strategic Planning Statement 2040+

The site is identified as Planned Investigation Area – Employment in the Maitland LSPS 2040+ (LSPS). The proposals are consistent with MCC's vision for the site outlined in the LSPS. Specifically, they align with the planning priorities of LSPS as it will provide additional employment land to support the LGAs growing population and increasing residential development in the eastern sector.



Maitland Urban Settlement Strategy 2012

The site is identified in the Maitland Urban Settlement Strategy 2012 (MUSS 2012) as Future Employment Land Category 1. Category 1 land is connected with existing urban areas and is expected to be more easily serviced and delivered prior to Category 2 land and Investigation Areas.

The planning proposal is consistent with the MUSS 2012 intended outcomes of providing additional land for employment. The proposed B5 Business Development zone responds to Council's centres hierarchy by supporting and not competing with nearby established retail and commercial centres of Maitland City Centre, Greenhills and the B2 Town Centre and B1 Neighbourhood Centre of Thornton and Chisholm respectively.

Activity Centres and Employment Cluster Strategy

The Activity Centres and Employment Cluster Strategy (ACECS) identifies new emerging business areas, as well as reinforcing the role and function of established business areas in the Maitland LGA through working in harmony with the network of employment clusters and activity centres, not in competition with existing centres. The ACECS aims to ensure new business areas achieve high amenity for employees, workers and visitors through built form, access to convenience facilities and the provision of transport options.

The site is in proximity to an existing and growing residential population with access and transport options to local and regional road and rail infrastructure. It is considered the proposal for a B5 Business Development zone in this locality is consistent with the vision and objectives of the ACECS.

Maitland +10 Community Strategic Plan

The planning proposal is consistent with the vision and objectives of the Maitland +10 Community Strategic Plan as it provides opportunities for urban growth within the city to meet the needs of a rapidly growing population.

Such consistency in the recognised future direction for the area has existed for a long time (upwards of 10 years in some cases). We believe that it should continue to remain so moving forward and do not believe that the Draft put forward does so.

5. Economic Impact Assessment

An Economic Impact Assessment (EIA) prepared by Hill PDA in October 2021 assessed the impact of the proposal, with its food and drink services, on the centre hierarchy and the economic viability of existing and proposed commercial centres within the LGA. The EIA identified a number of social and economic benefits of the proposal including:

- The precinct will provide an estimated 1,250 jobs on site
- A proposed 'restaurant or café' and/or 'pub' as defined by the Standard Instrument LEP will help
 activate the site, complement the other uses within the employment precinct and service the
 precinct workers. The use is also intended to create a place for visitors and nearby residents to
 socialise and interact thereby encouraging social cohesion.
- The trading impacts of the proposed 'restaurant or café' or 'pub' on surrounding centres would be acceptable as the proportion of growth in expenditure captured by the new development is well within acceptable limits enabling other centres to share some of that growth. The proposed use would not threaten the role, function or commercial viability of any existing centre.

6. Summary

The Draft Hunter Regional Plan 2041 must recognise the substantial strategic merit of the rezoning of land underway at Brickworks Road, Thornton by mapping the site as 'Proposed business' within Figure 11 of the Plan. The proposal will result in the rezoning of 48.66 ha of land, 40ha of which will be rezoned



to B5 Business Development zone. The proposal has the potential to generate significant employment opportunity and stimulate economic activity within proximity to existing transport corridors consistent with draft Hunter Regional Plan 2041 objectives. Identified as an Urban Release Area in the planning proposal, the site has the potential to unlock upgrades to services, utilities and transport infrastructure.

The site's inclusion within the final Regional Plan will strengthen confidence and investment in the proposal by key stakeholders such as MCC, infrastructure providers, government agencies and importantly - the local community. After more than four years of robust assessment and endorsement by Council (and soon Gateway) the proposal has been found to have strategic merit and is worthy of recognition within the final Regional Plan.

If you have any queries, please do not hesitate to contact us on (02) 4942 5441.





Newcastle Regional Office
Department of Planning and Environment
PO Box 1226
NEWCASTLE NSW 2300

Dear Regional Coordinator

Re: Submission to *Draft Hunter Regional Plan 2041* regarding shade and UV protection

Thank you for the opportunity to provide feedback on the draft Hunter Regional Plan (RP).

The Cancer Institute NSW (the Institute) is the state governments cancer control agency responsible for the delivery of the <u>NSW Cancer Plan</u> to reduce the incidence of cancer in NSW and the <u>NSW Skin Cancer Prevention Strategy</u>. The Institute works closely with key stakeholders with health and built environment expertise to reduce the incidence of skin cancer by improving access to adequate shade in NSW. The Institute also promotes sun protection and healthy lifestyle behaviours, including physical activity, which reduce the risk of certain cancers.

The Institute is committed to supporting communities and councils across NSW to reduce skin cancer and improving access to adequate shade and has prepared the following submission that:

- 1. outlines the importance of well-designed shade for the prevention of skin cancer
- 2. offers specific comments and suggestions regarding the draft RP
- 3. provides further information and contacts regarding planning for shade.

1. Skin cancer and shade

Skin cancer is the most common cancer in Australia. At least 95 per cent of melanoma skin cancer are caused by overexposure to ultra-violet radiation (UVR) from the sun.¹ UVR is a carcinogen, and two in three Australians are expected to develop skin cancer before the age of 70.² In NSW, the age-standardised rate of melanoma in 2017 was 53.5 per 100,000 population.³

Across NSW, Bureau of Meteorology records show UVR levels are high enough to damage unprotected skin for at least 10 months of the year. Unlike temperature, UVR can't be seen or felt and damage to unprotected skin can still occur on cool or overcast days.

The good news is that skin cancer is highly preventable. In addition to personal protective behaviours (<u>Slip Slop Slap Seek Slide</u>), there is evidence that well-designed and correctly positioned shade, from both natural vegetation and built structures, can reduce exposure to UVR by up to 75 per cent.⁴

The provision of good quality shade is integral to assisting the community in reducing its exposure to UVR. However, quality shade needs to be planned, provided and maintained with careful thought if it is to be effective. The flyer <u>Shade: A planning and design priority that</u> <u>helps prevents skin cancer</u> gives an excellent overview of the benefits of well-designed shade.

The Institute recognises that the RP will inform the planning strategies of each council within the Region, and in particular will underpin each councils' *Community Strategic Plan* and future



reviews of *Local Strategic Planning Statements*. In this context, the content of the RP is critical.

2. Specific comments regarding the draft RP

The Institute notes that shade is specifically mentioned in the section regarding Objective 5, together with a specific Strategy relating to the provision of shade. The Department is to be commended for these inclusions.

To recognise the importance of built and natural shade and its role in reducing overexposure to UV radiation, it is suggested that the following changes are made to the text in this section and others (suggested additional words are in italics):

others (suggested additional words are in italics).		
Page 44 second column, 2 nd paragraph	The benefits of trees and vegetation are not limited to where they are placed 'over paved surfaces', as currently stated in this paragraph. The intention should also be to decrease the amount of impervious surfaces by increasing vegetation.	
	Also, there are many more benefits of shade and green spaces, as articulated in <u>Shade: A planning and design priority that helps prevents skin cancer</u> , produced by the NSW Shade Working Group.	
	In this respect, the following changes are recommended to this paragraph:	
	Canopy coverage, green spaces and vegetation generally over paved surfaces are a cost-effective means of mitigating urban heat islands, protecting against over-exposure to UV radiation from the sun (being the leading cause of skin cancer),(include other benefits as outlined in the above NSW Shade Working Group publication).	
	The Institute recommends that the information above also be considered in conjunction with the comments regarding p45 below.	
	It should also be noted that the diagram on p44 associates rural agriculture and wider ecological issues as 'green infrastructure'. This diagram, and the green infrastructure entry in the Glossary should be reviewed to match accepted definitions of 'green infrastructure' (which do not include agriculture and the whole natural environment)	
P45 second paragraph	The Institute recommends the following changes: "Tree canopy also influences <i>micro-climates</i> by transpiring water, changing wind speeds, shading surfaces, and modifying the heat absorbed by urban surfaces and protects against over-exposure to UV radiation from the sun, being the leading cause of skin cancer."	



	These suggestions should also be considered in conjunction with the comments regarding p44 above.
P45 last paragraph	The first sentence of this paragraph is not easily understood; it is assumed that what is meant is that if tree shade is properly planned and sited, then complaints later about tree growth should be minimised? In any case, the second sentence in this paragraph is the key point and is supported by the Institute.
P45 diagram re benefits of green infrastructure	Change point no 5 to Shade [without the `s'] cools streets and public spaces and protects against over-exposure to UV radiation from the sun.
Strategy 5.5	The Institute recommends the Strategy be reworded as follows: Development proposals should incorporate Well-designed shade, both natural and built, should be provided in all public infrastructure-spaces, from large developments, such as major recreation facilities, open space, public buildings, plazas and town centres upgrades, to minor public domain improvements, such as playgrounds and bus shelters.
Objective 6	Overexposure to solar UV radiation (UVR) is a meteorological hazard caused by the interaction of the sun, ozone and other natural processes. As explained earlier, this hazard is present in the region at levels high enough to damage unprotected skin for at least 10 months of the year. As such, the Institute recommends that UVR be recognised in Objective 6 as a significant natural hazard, akin to heat, floods, bushfires and other types of hazards.
	It is further suggested that the Strategies in Objective 6 be expanded to better reflect the range of natural hazards encountered in the region, and in this context the following Strategy should be considered:
	Prepare a 'Shade and UV Protection Strategy' for each local government area, to help protect the community against overexposure to UV radiation.
Objective 7 - Strategy 7.1	The Institute suggests that an additional point should be added to this list:
	Providing well designed built and natural shade for comfort and protection against overexposure to UV radiation
Glossary	The Institute suggests that the following is added:
	Shade: well designed and appropriately located built structures and natural vegetation that provide shade from

Record number: E22/01963~5



	the sun to protect from over-exposure to UV radiation, the leading cause of skin cancer in Australia.
Reference list	Ideally a comprehensive reference list would be included in the Regional Plan, including the following:
	Cancer Council NSW, 2013: Guidelines to Shade - A practical guide for shade development in New South Wales

3. Further information and assistance

The Institute's key message is that the provision of well-designed, appropriately located and properly budgeted built and natural shade is integral to assisting regional communities in reducing over-exposure to UVR, and hence in reducing the risk of skin cancer in the community.

As such, the Institute will be making similar submissions to selected councils in your region regarding their Draft Community Strategic Plans and other planning strategies and is offering support and resources to councils that will assist in the planning, design and construction of shade. Some of these resources are provided in the *Additional Information* section below, while more detailed information is at https://www.cancer.nsw.gov.au/prevention-and-screening/preventing-cancer/preventing-skin-cancer/shade-and-uv-protection/helpful-shade-resources

has been engaged to assist in preparing this submission and to offer further support to NSW councils via the Institute, until the end of June 2022.

Further information and assistance can be obtained from the Institute:

Thank you for the opportunity to comment on the draft RP, and please keep the Institute informed as its progress.

Yours sincerely,



4 March 2022

Copy: Hunter New England Local Health District

Record number: E22/01963~5



References

- 1. Arnold, M., de Vries, E., Whiteman, D. Jemal, A., Bray, F., Parkin, D, Soerjomataram, I., 2018. *Global burden of cutaneous melanoma Attributable to ultraviolet radiation in 2012.* International Journal of Cancer 3(6):395-401.
- 2. Australian Institute of Health and Welfare 2016. Skin cancer in Australia. Cat. no. CAN 96. Canberra: AIHW
- 3. Cancer Institute NSW Statistics Portal https://www.cancer.nsw.gov.au/research-and-data/cancer-data-and-statistics/cancer-type-summaries-for-nsw/melanoma-statistics (accessed February 9 2022)
- 4. Parsons, P., Neale, R., Wolski, P. & Green, A. 1998, *The shady side of solar protection*, Medical Journal of Australia, 168: 327-330.

Additional information

General information about skin cancer, UV exposure and shade: <u>cancer.nsw.gov.au/shade-and-uv</u>

Numerous resources for local government regarding planning and designing shade: https://www.cancer.nsw.gov.au/prevention-and-screening/preventing-cancer/preventing-skin-cancer/shade-and-uv-protection/helpful-shade-resources

An excellent 2 page summary about the benefits of shade (Cancer Institute NSW, 2019): Shade: A planning and design priority that helps prevents skin cancer.

Cancer Council NSW, 2013: Guidelines to Shade - A practical guide for shade development in New South Wales

Cancer Institute NSW, 2017: NSW Skin Cancer Prevention Strategy

From: Skin Cancer Prevention (Cancer Institute NSW)

To: <u>DPE PSVC Hunter Mailbox</u>

Subject: Hunter Regional Plan 2041 submission
Date: Friday, 4 March 2022 2:03:30 PM

Attachments: <u>image001.png</u>

image002.png image003.png image004.png image005.png image006.jpg

Hunter Regional Plan submission Cancer Institute NSW.pdf

Dear Hunter Regional Coordinator

Attached is a submission from of the Cancer Institute NSW on the draft Hunter Regional Plan 2041.

Don't hesitate to get in touch with any questions.

I look forward to hearing the outcome of our submission and the exhibition process.

Kind regards



We acknowledge the traditional custodians of the lands on which we work and live, and pay our respect to Elders past, present and future.

This message is intended for the addressee named and may contain confidential information. If you are not the intended recipient, please delete it and notify the sender.

Views expressed in this message are those of the individual sender, and are not necessarily the views of NSW Health or any of its entities.



04 March 2022

Hunter Regional Planning Team NSW Department of Planning and Environment hunter@planning.nsw.gov.au

Dear

RE: draft Hunter Regional Plan 2041 (New England Highway / HEX)

has prepared this submission to the *draft Hunter Regional Plan 2041* on behalf of Our client is a major strategic landowner and developer in the Hunter Valley delivering a variety of town centre renewal, residential, large lot residential, rural lifestyle and small-lot viticulture, and tourism uses across landholdings at Lochinvar, Anvil Creek, Branxton, North Pokolbin, and Lower Belford (within the proposed Greater Newcastle, Central Hunter, and Hinterland districts).

We understand the *draft Hunter Regional Plan 2041* is the first 5-yearly update to the inaugural *Hunter Regional Plan 2036* released in 2016. Our submission objects to certain elements of the *draft Hunter Regional Plan 2041* that appear to go beyond updating the existing Plan and would introduce fundamental and material changes in practice. In our view, the implications of these elements warrant careful consideration to avoid unduly diminishing investment certainty and confidence across both the private and public sectors, and to avoid jeopardising the successful implementation of longstanding regional-level planning priorities.

Our recommended changes for consideration are summarised as follows.

- 1. The New England Highway Corridor should continue to be recognised as a 'Regional Planning Priority' within the Greater Newcastle District. This recommendation serves to re-instate the regional relevance of a corridor that has been 'in planning' for decades. Already-established growth areas between Maitland and Huntlee are now primed to deliver the next generation of housing and employment lands for the Hunter, but leadership and efforts from Governments at all levels are still required to direct investment and coordinate delivery. Its acknowledgement in the final Regional Plan will ensure the basis for those efforts can continue. Planning efforts are still required to support the delivery of a regionally significant volume of housing and employment lands across up to three Local Government Areas.
- 2. As part of this Regional Planning Priority, the Regional Plan should identify a need to urgently re-visit planning frameworks underpinning longstanding growth areas within the New England Highway Corridor. By planning frameworks, we mean the LEP, DCP, and State/Local contributions plans in place to guide on-the-ground outcomes. Many of these are now over a decade old and will, by design, fall well short of contemporary planning benchmarks, and we have provided more detailed information for Lochinvar (15-year-old framework) and Anvil Creek (20-year-old framework) as relevant to our client's interests. This effort is vital to incorporating the optimal density and place making aspirations of the *draft Hunter Regional Plan*. It must be a near-term initiative for areas between Maitland and Huntlee, where development activity is still in relatively early stages, so that any relevant adjustments to the planned urban structure can be made ahead of growth delivery.
- 3. The HEX Growth Area boundaries around the Branxton-Allandale interchanges should be redrawn. These interchange areas, combined, cover around 9,400ha of land, or roughly three-quarters the size of the Western Sydney Aerotropolis. Flagging such a vast area at best confuses and at worst contradicts other regionally relevant planning priorities including opportunities to enhance place making within the New



England Highway Corridor between Maitland and Huntlee. Neither the delivery nor the enhancement of development within the existing growth areas included within these boundaries threaten the HEX interchange functionality. These boundaries should be revised to ensure efforts to update the planning control frameworks at Anvil Creek and Lochinvar can continue without delay or added complication – specifically by ensuring the boundary does not dissect our client's consolidated landholding at Lochinvar. Ideally, the boundaries should be re-drawn to clearly signpost the amount of land and preferred locations for the industrial and freight and logistics uses that the HEX strategy is seeking to protect. These changes would provide greater certainty for future investment.

We would welcome the opportunity to discuss the issues raised in our submission with you in more detail as you prepare the final Hunter Regional Plan - please do not hesitate to contact me on to discuss this further.

On behalf of my client, I thank you for your consideration of the matters raised in this submission.





EXECUTIVE SUMMARY

has prepared this submission to the draft Hunter Regional Plan 2041 on behalf of

This submission analyses the market context of the draft plan and establishes that the Hunter Region is the most important contributor to housing delivery outside metropolitan Sydney. It also identifies that this is a longstanding trend that has been accelerated by the COVID-19 pandemic and is likely to continue into the future.

It then considers the changes that have been made in the *draft Hunter Regional Plan 2041* compared to the adopted *Hunter Regional Plan 2036* in specific locations; namely:

- The New England Highway Corridor, and, within this:
 - The expanding village of Lochinvar, and
 - The Branxton-Greta sub-region, and
- The Hunter Exchange (HEX) Corridor.

Planning establishes the framework in which economic activity can exist. Certainty is critical for investment to be made that supports economic activity. While it is acknowledged that sometimes changes in plans are necessary, such changes should be carefully considered so they do not have material unintended consequences on future growth and investment.

A range of recommendations are offered for consideration that would improve the capacity to deliver the desired outcomes described in *draft Hunter Regional Plan 2041* and maintain the integrity of the adopted Plan, while still allowing sensible and incremental changes. These are provided to help planners maintain the integrity and relevance of the planning framework over time.

All recommendations made in this submission are summarised below.

NEW ENGLAND HIGHWAY CORRIDOR - REGIONAL PLANNING PRIORITY

The New England Highway Corridor should be re-instated as a Regional Planning Priority because:

- The growth rate and magnitude of development capacity here is unrivalled within the region
- The need and urgency to optimise planning frameworks to deliver contemporary planning objectives
- The ongoing need for cross-jurisdictional / multi-agency coordination

REGIONAL PLANNING PRIORITIES FOR LOCHINVAR - DETAILED CONSIDERATIONS

The Plan should explicitly support the 15-year-old planning framework for Lochinvar to be reviewed and updated as an urgent regional planning priority, so that the growth set to occur here in the immediate term is encouraged to reflect contemporary density and placemaking outcomes. The purpose of this review should be to:

- Optimise the use of land around the train station to create the vibrant rail precinct envisaged in the 2007 Structure Plan,
- Consider road transport solutions that would serve to minimise reliance on the New England Highway and Hunter Expressway for local trips, and
- Set the framework for a westward expansion to the URA.

Consequently, the HEX Corridor Regionally Significant Growth Area directions (including the boundaries associated with the Allandale Interchange) should be amended so that they don't interfere with or delay the efforts described above. This should specifically ensure the boundary does not dissect our client's consolidated landholding.



REGIONAL PLANNING PRIORITIES FOR BRANXTON-GRETA - DETAILED CONSIDERATIONS

The Plan should explicitly support the 20-year planning framework for "Anvil Creek" area to be re-investigated in conjunction with the surrounding consolidated landholding as a regional planning priority. The purpose of this review would be to:

- address regional housing supply gaps and improve the robustness of supply within the Branxton-Greta subregion,
- · facilitate planning for improved public transport accessibility over the long-term, and
- enable the growth that occurs to reflect contemporary density and placemaking outcomes.

The Plan should also explicitly acknowledge and support the acceleration of planning efforts to revitalise and renew Branxton Town Centre as a regional planning priority, enabling these efforts to leverage broader Government support and funding.

Consequently, the HEX Corridor Regionally Significant Growth Area directions (including the boundaries associated with the Branxton and Allandale Interchanges) should be amended so that they don't interfere with or delay the efforts described above.

HEX CORRIDOR - REGIONALLY SIGNIFICANT GROWTH AREA

The specific adjustments recommended to be made to the HEX Corridor Regionally Significant Growth Area to support the above considerations relate to:

- The directions provided in the described approach, which should be clarified in relation to planning for urban (residential) outcomes, and
- The boundaries associated with the Branxton-Allandale interchanges, which should be re-drawn to avoid overlapping with urban planning priorities along the New England Highway.

The directions enacted by the HEX Corridor Growth Area boundary should be re-worded as follows to provide a degree of flexibility to review and update planning frameworks in existing (developed or planned) urban areas without triggering the need for a comprehensive Place Strategy to precede decisions.

- 'Discourage (rather than prohibit) rezoning for residential or rural residential development, other than:
 - Land in an existing urban zone (e.g., intensification)
 - Land with a Gateway Approval, or
 - Adjustments contiguous to an active Urban Release Area.'

This re-wording is intended to avoid the potential for complications or delays to arise from confusion around the process or accountability to progress strategic planning efforts.

Ideally, the HEX Corridor Growth Area boundary should be re-aligned so that it does not apply to areas where an urgent review of planning controls to deliver broader housing supply and placemaking outcomes is advantageous, including around:

- The Lochinvar URA, by removing our consolidated landholding and remaining land to the east of Allandale Rd and north of the heavy rail line, and
- The Branxton-Greta subregion, by removing land associated with our client's consolidated landholding around Anvil Creek.

Planning for these areas should instead progress in line with the New England Highway Corridor either as a regional planning priority or, where relevant, a separate Regionally Significant Growth Area.

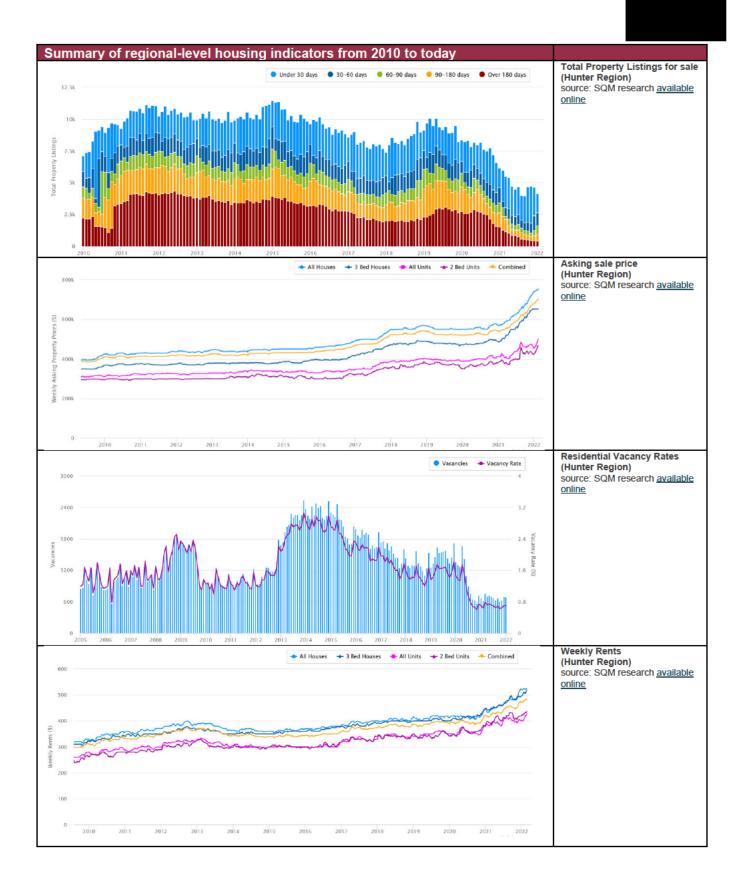


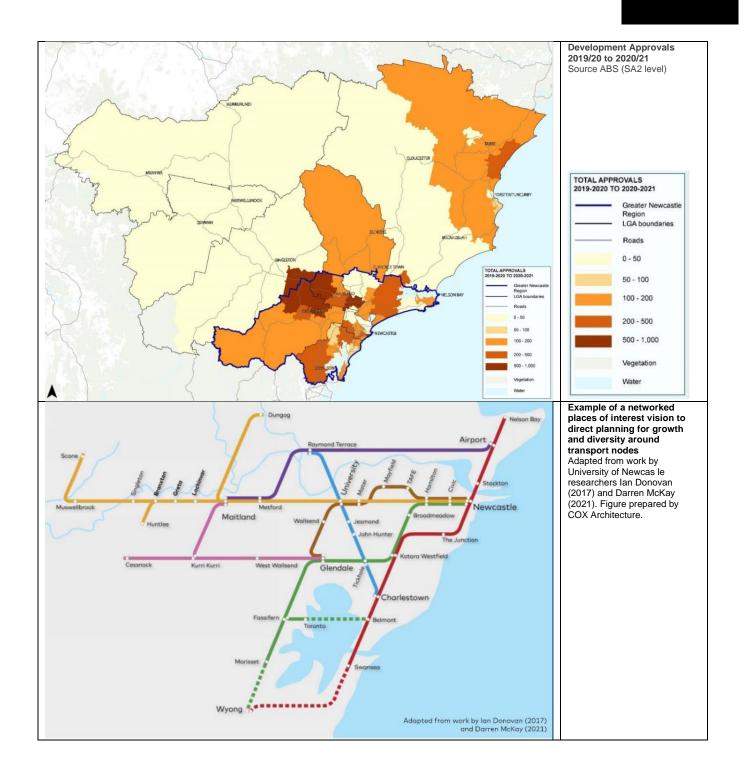
CONTEXT - PLANNING FOR AND DELIVERING DEVELOPMENT IN THE HUNTER

The Hunter is the largest regional economy in Australia, undergoing a major structural change. The *draft Hunter Regional Plan 2041's* acknowledgment of the need to plan for a post-coal future is both timely and welcome in that regard. However, greater emphasis and clearer directions are still missing from the *draft Hunter Regional Plan 2041* to address the short-term implications of the current housing crisis and the long-term opportunities to improve the liveability of our new and renewed neighbourhoods.

recent research into housing supply in the Hunter (prepared for Government and peak industry body clients) has revealed several important insights, as summarised below. These echo many of the Regional Housing Taskforce recommendations.

- The Hunter is growing. Greater Newcastle is the seventh largest city in Australia, and every year, the broader Hunter region effectively adds a town the size of Parkes to its population. This trend pre-dated the COVID-19 pandemic but has been amplified over the last 2 years not because more people are choosing to move to the region (though in-migration has remained steady) but because far fewer working-age people are leaving. Business confidence evidenced by job vacancies indicate this trend is set to continue.
- The Hunter is a supply-driven housing market. Housing supply hasn't been keeping up with real demand since around 2017. This is evident in the trends showing the accessibility of housing (for sale and rent) in conjunction with the cost of housing (for sale or rent), provided on the following page. In short, housing was gradually becoming less available and more expensive from around 2017 to the start of the pandemic. During the pandemic, these trends shifted markedly, and now reflect crisis-levels. The NSW Government's housing projections have also tended to fall short of real demand; the industry has been consistently delivering new housing above the implied dwelling requirements derived from NSW projections released in 2017 and 2019.
- Housing growth isn't uniform across the region. Development activity (reflected through rezonings as well as approvals and completions) in the Hunter is currently highest in the area between the strategic centres of Maitland, Cessnock, and Singleton at the westernmost edge of the Greater Newcastle Metropolitan area. This area also has the largest latent supply of housing in the region. Urgent attention is warranted here to coordinate the delivery of infrastructure, optimise investment in infrastructure improvements, and ensure planning controls are enabling efficient use of land.
- To be effective, housing supply needs to be reliable and robust. The continuity of greenfield land supply is critical to maintaining the volume of housing that the Hunter needs, both to address historic shortfalls and to accommodate future demand. This relies on tracking not only the theoretical capacity of growth areas, but also understanding where we can achieve larger windfalls (e.g., through delivery on consolidated landholdings).
- Good strategic planning enables agility. The Lower Hunter's planned urban footprint has remained relatively static since around 2006, but a considerable amount has changed since. The planning controls that guide development in growth areas need to be regularly reviewed to remain relevant and ensure they are meeting current-day benchmarks and expectations. This includes enabling 'out-of-sequence' rezonings that can lead to improved planning outcomes or greater returns on investment in infrastructure, for example.
- We need to plan better for growth and diversity around transport nodes, especially in regional areas. This is a key principle recommended by the Regional Housing Taskforce to allow or even explicitly require a more diverse mix of housing in new developments providing a base case for the progressive roll-out of public transport networks / improved services and to ensure that denser forms of housing development are also of a high design quality, without adversely impacting on feasibility. Achieving this relies on government leadership, which should start with a clear long-term picture of the networked places of interest as a basis for planning and plan-making.







NEW ENGLAND HIGHWAY CORRIDOR - REGIONAL PLANNING PRIORITY

We understand the 'Regional Planning Priorities' identified for each of the proposed Districts are intended to signpost where planning control frameworks have been substantially established, but ongoing efforts are still required to continue delivering regional planning outcomes over time. In our experience, these areas will not rely on the preparation of all-new Local Environmental Plans, Development Control Plans, or development contributions mechanisms, but do still require support in the coordination and delivery of planned land uses and associated infrastructure.

Within the proposed Greater Newcastle District, Regional Planning Priorities are described in the *draft Hunter Regional Plan 2041* to address additional housing needs arising from the Williamtown Special Activation Precinct (announced in May 2020) and changes occurring in and around places that had been previously nominated in the *Hunter Regional Plan 2036* or the *Greater Newcastle Metropolitan Plan 2036* as Strategic Centres or Catalyst Areas, including Newcastle City Centre, Central Maitland, East Maitland, North West Lake Macquarie, and the John Hunter Hospital and Innovation District.

Yet, the *draft Hunter Regional Plan 2041* does not describe any place-based priorities for the New England Highway Corridor. This was a noticeable omission within the development industry because the urban footprint that is currently supported within the Corridor (e.g., urban area extensions at Farley, Huntlee, Lochinvar, and Anambah) has been a regional planning initiative to accommodate the Hunter's housing needs and support economic productivity since the release of the *Lower Hunter Regional Strategy 2016*. Investor confidence in new projects within this Corridor have subsequently been underpinned by decades of public and private sector investment, and the western segment (from Central Maitland to around Huntlee / Whittingham) is still only in the relatively early stages of delivery.

The existing *Hunter Regional Plan 2036's* recognition of the 'Maitland Corridor' – supported the Kurri – Cessnock and Branxton – Greta growth area extensions – provided a continued focus for planners and the development industry to deliver directions that encouraged a more compact settlement footprint (Direction 21), and centres that meet people's everyday needs (Direction 23) as well as an opportunity to support better placemaking in line with growth through, for example, the creation of healthy built environments (Direction 17) and enhancing access to recreational facilities and connect open spaces (Direction 18). These regional-level directions are still relevant, as evidenced through the *draft Hunter Regional Plan 2041's* stated objectives.

Corresponding directions to support planners and the wider development industry to deliver these outcomes in what is arguably the Hunter's largest future housing supply area are not currently provided in the *Greater Newcastle Metropolitan Plan 2036*. For that reason, its omission from the *draft Hunter Regional Plan 2041* appears to remove the regional significance of this area so, in our view, indicates a fundamental change to planning practice.

We recommend the New England Highway Corridor is re-instated as a Regional Planning Priority before the *Hunter Regional Plan 2041* is finalised for the following reasons.

1. The growth rate and magnitude of development capacity here is unrivalled within the region

The New England Highway Corridor has been the fastest growing area outside Sydney, delivering new housing and employment lands supply to the largest regional economy and seventh largest city in Australia for decades.

The focus for coordinating and delivering development within this corridor is shifting, as recognised in the *Greater Newcastle Urban Development Program Annual Report* published in February 2020, which states: "There is diminishing supply in the eastern part of the Maitland Corridor, but the...Branxton — Greta Growth Area extension (along with remaining supply in the western part of the Maitland Corridor) also have a high amount of remaining supply." Based on our high-level review of current planning frameworks, that remaining supply has the baseline potential to produce over 16,000 greenfield residential lots and offer around 750ha of employment lands to the market under current planning frameworks.



2. The need and urgency to optimise planning frameworks to deliver contemporary planning objectives

Substantial investments in transport, water, and sewer infrastructure over several decades mean this western segment of the New England Highway Corridor is now one of the least constrained and most strategically advantageous locations in the Hunter. It is primed to deliver the Hunter's next generation of urban and economic development projects, also offering unrivalled potential to accelerate the delivery of new housing supply for the region, noting demand has been exacerbated by the COVID-19 pandemic.

The approach to planning outlined in the *draft Hunter Regional Plan 2041* undermines its own objectives, by proposing fundamental changes to key universal benchmarks for planning to optimise land use efficiency and improve urban amenity – calling on developments to achieve far higher urban densities and placemaking outcomes than have previously been proven within the Hunter market – but not providing directions to urgently update frameworks where these benchmarks can be almost immediately implemented though the delivery of new projects.

It has been well over a decade since the individual delivery frameworks (reflected in LEPs, DCPs, and State and Local developer contributions mechanisms) for many of these urban release areas were set. Upon examination, these frameworks reflect outdated benchmarks, which means new areas will fall well short of what our communities expect and deserve. We describe this in more detail in relation to the delivery framework for Lochinvar later in this submission.

But development activity has only recently started to ramp up within the western segment of the corridor, between Maitland and Branxton on the back of significant investments in enabling infrastructure. So, the time is now to review and update the planning directions and intentions to ensure efficient use of land and influence better quality placemaking if we genuinely expect to achieve the on-the-ground outcomes aspired to in the *draft Hunter Regional Plan 2041*.

3. The ongoing need for cross-jurisdictional / multi-agency coordination

For context, the New England Highway Corridor between Maitland and Huntlee covers a similar footprint to growth areas in Sydney - such as Greater Penrith to Eastern Creek and Greater Paramatta to Olympic Peninsula – that have been a strong focus of Government-led planning and coordination. While the area may not produce the same order of magnitude in total development yield, the complexities of delivering new projects within this corridor warrant a proportional degree of attention to integrate land use and transport planning – especially if we ever expect to achieve more compact, less car-reliant, cohesive, and connected communities.

At a minimum, a program of access improvements along the New England Highway is required to manage transport demands and activate growth within substantial new urban and employment growth areas across three Local Government Areas. Additional efforts to progressively establish a comprehensive multimodal public / active transport network in line with growth requires regional level leadership. The stations at Branxton, Greta, and Lochinvar can, in time, be serving a high throughput of passengers along the Hunter line. There is still a significant amount of undeveloped opportunity area within rail station walking catchments, which presents an opportunity for transit-oriented development made up of compact, walkable, and high amenity communities. But we need to make decisive adjustments to pivot planning practice now to maximise the benefit of this infrastructure and ensure it doesn't go to waste

To achieve this requires coordination beyond the boundaries of the individual Councils, and across several State agencies – particularly at a time when public sector work programs are already loaded. Given the range of stakeholders involved in delivery – across public and private sectors – a higher degree of regional-level coordination and government leadership is required to set and deliver (not set and forget) outcomes across the growth areas that are already committed, with an aim to enable the whole to function greater than the sum of the parts. Government at all levels would therefore get a higher return on public sector investment and resourcing by continuing to recognise the New England Highway Corridor, particularly between Maitland and Huntlee, as a regional planning priority within the Greater Newcastle Metropolitan District, providing a basis for directing funding and resources towards coordination and integrated planning / delivery efforts therein.



Overview of planning and delivery efforts within the NEH Corridor (western segment)

Rutherford Maitland City Council

 At over 200+ha, this is area is a regionally significant employment cluster with an industrial and bulky goods focus, with the potential to leverage rail and aviation assets. Efforts to attract investment are still ongoing.

Anambah Maitland City Council

With an estimated capacity of 3,000 lots, this URA is establishing the enabling
infrastructure required to commence production. This will almost immediately
rely on the delivery of road link to Lochinvar via the Windella Rd – New England
Highway intersection to unblock supply.

Lochinvar Maitland City Council

 This URA has the capacity to deliver up to 5,000 lots under its current planning framework, which is approaching 15 years old. Delivery of the 1st and 2nd stages still rely on Highway intersection upgrades and coordination across several landholdings to establish an internal northern ring road. Later in this submission we describe why an urgent review of the remaining development potential is warranted to optimise land efficiency and transport network investments, as well as placemaking outcomes.

Anvil Creek / Walkers Hill / Mt Molly Morgan Cessnock City Council

Initially conceived 20 years ago as an integrated golf course development, this
area represents an opportunity to creating a contemporary extension to the
Greta township through the staged delivery of a single, consolidated
landholding. Later in this submission we describe why the underlying planning
framework warrants an urgent review of the remaining development potential is
warranted to optimise land efficiency and transport network investments, as well
as placemaking outcomes.

Branxton' Town Centre Cessnock City Council

Renewal and revitalisation efforts are underway to re-position this centre after it
was effectively bypassed by the HEX. Several factors inherent to the town
centre, including heritage and flooding, reduce Branxton's competitive
advantage in the context of the wider network of centres, including the emerging
major centre at Huntlee, and nearby local centres at Greta and Lochinvar. It will
rely on a bespoke planning framework and supporting initiatives to remain
competitive and attract investment.

Huntlee Cessnock City Council & Singleton Council

A whole new town is now underway. The staged development program is set to
produce more than 7,000 homes, around 200ha of employment lands, and an
attractive town centre to meet the needs of a growing community and create
more jobs closer to home.

Wittingham Singleton Council

 Efforts are still ongoing to attract investment to this 350ha Industrial Park, where businesses can leverage its dual Golden and New England Highway frontage and strategic location within the NSW freight network.



REGIONAL PLANNING PRIORITIES FOR LOCHINVAR - DETAILED CONSIDERATIONS

We recommend the following changes to the *draft Hunter Regional Plan*, relevant to the future planning for and around Lochinvar.

- 1. The Plan should recommend that the 15-year-old planning framework for Lochinvar is reviewed and updated as an urgent regional planning priority, so that the growth that occurs here reflects contemporary density and placemaking outcomes.
- 2. The HEX Corridor Regionally Significant Growth Area directions (including the boundaries associated with the Allandale Interchange) should be amended so that they don't interfere with or delay the efforts described above.

Lochinvar was initially identified as a preferred location for growth in the 2006 Maitland Urban Settlement Strategy. A Structure Plan for the area was adopted by Maitland City Council in 2007, and the urban release area was rezoned uniformly for residential development in 2011. It is supported by an area-specific Development Control Plan (established in 2011) and Local Contributions Plan (established in 2014). A more recent rezoning in 2021 established a 2.5ha commercial centre, the exact location for which was uncertain at the time of the original rezoning.

Despite the age of Lochinvar's planning framework, development activity has only recently commenced. To date, we understand over 900 lots have been approved for development, with over 1,000 lots currently under assessment. The rate at which lots can be constructed is currently limited by caps associated with the delivery of URA-wide infrastructure priorities, including regional stormwater basins, two intersections with the New England Highway, and the completion of the northern ring road. Based on sales data (price and time on market), we expect a high take-up rate once these URA-wide issues are resolved, and the associated development caps are lifted.

At the time it was rezoned, the URA was estimated to be capable of providing around 5,000 dwellings (averaging 8 dwellings per gross hectare) – resulting in a community of around 12,500 people. The urban structure emerging is consistent with this planning framework, with the vast majority of lots reflecting an almost uniform pattern of single detached dwellings on lots averaging between 600-800m² (and ranging between 450-1,500m²), which equates to around 12-16 dwellings per hectare of net development. If this pattern continues, the URA is on track to fall well short of the optimum density of 50-75 dwellings per hectare of net development underpinning the enhanced placemaking outcomes envisaged in the *draft Hunter and Regional Plan 2041*. That would not lead to an area that could viably support a vibrant commercial area or public transport networks.

Our client has been advocating for the planning framework underpinning Lochinvar to be reviewed and updated for several years. The purpose of this review would be to:

- Optimise the use of land around the train station to create the vibrant rail precinct envisaged in the 2007 Structure Plan. Much in the same way that the precise configuration of the town centre could not be detailed when the URA was originally established, we are now approaching the time to progress this as a 'key development site', with the involvement of Transport for NSW as a key stakeholder.
- Consider road transport solutions that would serve to minimise reliance on the New England Highway
 and Hunter Expressway for local trips. This would involve progressing planning for the western link road
 envisaged in the 2007 Structure Plan that could serve as a 'back door' to the URA with direct connections
 to the larger commercial centre emerging at Huntlee as well as employment opportunities and attractions
 within the Hunter Valley Vineyards.
- Set the framework for a westward expansion to the URA. It has been 15 years since the Lochinvar Structure Plan was prepared. Its eastern edge will serve as an urban break between this URA and other uses emerging within the Rutherford Employment Lands. The western boundary serves to contain development within identifiable drainage catchment areas, but detailed investigations undertaken by our client have proven land to the west would be suitable to facilitating urban development as a logical extension, without compromising other planning outcomes (such as agricultural or scenic values).

Given the typical timeframe to complete the technical investigations, establish the strategic frameworks, and secure the necessary approvals (from rezonings to detailed development applications) the timing to initiate this review is now – so that the necessary adjustments can be made to optimise outcomes as growth occurs within the existing URA boundary and to enable a seamless activation of additional supply at the right time.



Maitland's *Local Strategic Planning Statement* indicates long-term intention for Council to prepare a structure plan for the Western Segment of the Local Government Area. In our view, this would result in a substantial missed opportunity to improve planning outcomes at Lochinvar, where growth is occurring now. A regional planning priority within the *Hunter Regional Plan 2041* would assist by providing a greater sense of urgency and basis for coordinated efforts from delivery partners including individual landowners, Council, TfNSW, ARTC, and DPE.

The inclusion of unzoned land to the west of the Lochinvar URA within the HEX Corridor Growth Area boundary has the potential to compromise the efforts described above, particularly as it proposes to *'prohibit rezoning for residential or rural residential development.'* We therefore request the HEX Corridor Growth Area boundary is realigned westward to Allandale Rd and southward to the heavy rail line to allow planning for and around the Lochinvar URA to continue. This boundary modification would not compromise the stated purpose of the HEX Corridor Growth Area and HEX Principles, as discussed in more detail later in this submission.

REGIONAL PLANNING PRIORITIES FOR BRANXTON-GRETA - DETAILED CONSIDERATIONS

We recommend the following changes to the *draft Hunter Regional Plan*, relevant to the future planning for urban areas within the Branxton-Greta area:

- 1. The Plan should recommend that the consolidated landholding around the "Anvil Creek" area is reinvestigated as a regional planning priority to address regional housing supply gaps and enable the growth that occurs to reflect contemporary density and placemaking outcomes.
- 2. The Plan should acknowledge and support the revitalisation and renewal of Branxton Town Centre as a regional planning priority.
- 3. The HEX Corridor Regionally Significant Growth Area directions (including the boundaries associated with the Branxton and Allandale Interchanges) should be amended so that they don't interfere with or delay the efforts described above.

Planning within the Branxton-Greta area has evolved over several decades. The former Greta Migrant Camp was originally approved for redevelopment as an integrated golf course development 20 years ago, and the planning framework that now underpins this area was established in 2010. Planning for a new town at Huntlee was initiated in 2006 by the *Lower Hunter Regional Plan 2016* and implemented through a State-led rezoning in 2010. Cessnock and Singleton Councils jointly adopted the *Branxton Subregion Land Use Strategy and Structure Plan* and the supporting *Branxton Town Centre Masterplan* (prepared with funding from the Department of Planning) in 2016; this established a unified (cross-LGA) vision and strategic planning basis for managing structural changes arising from the Hunter Expressway opening in 2014 and the commencement of development at Huntlee.

More recently, in 2018, the *Hunter Regional Plan 2036* acknowledged the Branxton-Greta growth area extension to the Maitland Corridor. In 2021, Cessnock's *Urban Growth Management Plan* was adopted, identifying this area as the source of its 'commuter urban' category of housing land supply. Within this category, Huntlee and Anvil Creek are the only two zoned development fronts available, and only Huntlee is currently producing lots. We understand more recent modelling undertaken by Council with support from DPE indicates there is less than 2 years' effective supply of residential available within this area.

Within this subregion, our client is currently working towards the following outcomes:

- Revitalising Branxton's Town Centre,
- Enhancing the Radford Park large lot living estate at North Branxton,
- Delivering the Murrays Rise environmental living estate at Standen Drive, and
- Re-considering the future growth potential of the former Greta Camp area (referred to hereafter as Anvil Creek) in conjunction with the adjoining Walkers Hill Investigation Area (identified in Cessnock's Urban Growth Management Plan) to the north of the heavy rail line and Mt Molly Morgan to the south of the Hunter Expressway.

Collectively, projects associated with the above provide an opportunity to translate several of the objectives described in the *draft Hunter Regional Plan 2041* into tangible outcomes. Examples include big and small adjustments to, for example:

- Attract a range of new businesses and investment to Branxton's 'incomplete' town centre.
- Provide safe pathways for residents in growing areas like Radford Park and Huntlee to walk or cycle to Branxton's town centre.
- Enable and encourage increased urban density to progressively build the context for public transport viability, leveraging the existing rail network.
- Provide publicly accessible green links from existing and future urban areas into the Vineyards District.



Implementing these objectives relies on cross-jurisdictional stakeholder involvement in planning and delivery, across both the Cessnock and Singleton LGAs, and in relation to State Road and Rail networks (TfNSW and ARTC assets). While the *Branxton Subregion Land Use Strategy and Structure Plan* and the supporting *Branxton Town Centre Masterplan* published in 2016 provided a solid starting point for planning in the area, this framework was established right at the outset of deliver for Huntlee and the HEX as major region-shaping elements. Many of the growth rate assumptions and recommended delivery models need to be reviewed and updated to reflect current needs and expectations.

With this context in mind, enhancing the growth potential and effectiveness of supply within Branxton-Greta area warrants, at minimum, recognition as a regional planning priority within the context of the New England Highway and may warrant consideration as a Regionally Significant Growth Area in its own right.

In either scenario (Regional Planning Priority or Regionally Significant Growth Area), the inclusion of established growth areas and adjoining investigations areas (identified in Council-prepared local plans) within the HEX Corridor Growth Area boundary is confusing, particularly as it proposes to 'prohibit rezoning for residential or rural residential development.' We therefore request the HEX Corridor Growth Area boundary is re-aligned southward to the heavy rail line to allow planning for urban areas within the New England Highway Corridor to continue. This boundary modification would not compromise the stated purpose of the HEX Corridor Growth Area and HEX Principles, as discussed in more detail later in this submission.

HEX CORRIDOR - REGIONALLY SIGNIFICANT GROWTH AREA

To support the considerations described above, we recommend the following adjustments to the Hunter Expressway Corridor Regionally Significant Growth Area.

- 1. The directions provided in the described approach should be clarified in relation to planning for urban (residential) outcomes.
- 2. The boundaries associated with the Branxton-Allandale interchanges should be re-drawn to avoid overlapping with urban planning priorities along the New England Highway.

We acknowledge the relevance of the HEX as an important freight link within the broader road network. The strategic planning framework for this network is set out in TfNSW's *Freight and Ports Plan 2018-2023*. This document provides a relevant context for the role of State and Local Governments in planning for freight and logistics uses, recognising that: *freight and logistics land, and key corridors, are planned to avoid potential conflict with land uses that are incompatible with freight operations, some of which need to operate 24 hours a day, seven days per week* (p68).

We understand the 'Regionally Significant Growth Areas' identified for each of the proposed Districts are to be the focus for the preparation of Place Strategies overseen by a new Place Delivery Group. In our experience, these types of strategies tend to be implemented through the preparation of new planning controls (LEP, DCP, and development contributions mechanisms) to set or re-set the delivery framework.

The *draft Hunter Regional Plan 2041* nominates the Hunter Expressway Corridor as a Regionally Significant Growth Area under the 'Region-shaping gateways and industry precincts' heading, where the purpose is to coordinate industry growth and secure freight capacity. This purpose is further underpinned by three principles for planning that were previously established in the *Greater Newcastle Metropolitan Plan 2036* to:

- 1. Maximise accessibility through the existing interchanges to maintain connectivity and productivity across Greater Newcastle.
- 2. Protect high value land adjacent to each interchange for industrial and freight and logistics uses.
- 3. Protect the operation of the Hunter Expressway by limiting the encroachment of sensitive residential uses.

In our view, the approach to planning around the HEX Interchanges goes beyond updating the *Hunter Regional Plan 2036* because it introduces a fundamental change to planning practice in areas that had not previously been afforded a similarly detailed focus. Specifically, this approach appears to privilege industrial, and freight and logistics uses over other land uses within the boundaries shown. The Growth Area boundary associated with the Branxton-Allandale interchanges overlaps considerably with the New England Highway Corridor and, to a lesser extent, the Viticulture Regionally Significant Growth Area. The understood purposes of planning within each of these areas are not entirely compatible, warranting a review of the HEX Corridor Growth Area boundaries, and further clarification to balance competing priorities.



For context, when combined, the HEX Interchange Growth Areas encompass around 13,300ha of land, which is larger than the Western Sydney Aerotropolis. Given the magnitude of lands involved, it is important that the approach to planning described at a regional level adds value and clarity to the process of long-term strategic planning.

The HEX released considerable capacity along the New England Highway, which the Hunter Regional Plan 2036 leveraged when identifying the 'Maitland Corridor' as a regional priority for urban growth. As described earlier in this submission, the established urban footprint along the New England Highway Corridor is now poised to be the next 'boom' area delivering new homes and jobs for the Region.

The inclusion of established growth areas such as Anvil Creek, investigations areas adjoining established or planned urban areas such as Walkers Hill, and unzoned land to the west of the Lochinvar URA within the HEX Corridor Growth Area boundary has the potential to compromise the detailed planning efforts described earlier in our submission, particularly as the approach that this boundary enacts is supported by directions that influence urban residential land use outcomes, including to

- 'Prohibit rezoning for residential or rural residential development, other than land in a current proposal or future endorsed local strategy', and
- 'Focus new housing to nearby existing towns and centres to ensure the interchanges are primarily used for employment land uses.'

In practice, this would limit the ability of planning to remain agile as urban development progressively rolls out. This is particularly relevant to areas that are directly accessed via the New England Highway, including the historic (and now bypassed) towns of Lochinvar, Greta, and Branxton.

We recommend the first direction is re-worded as follows to provide a degree of flexibility to consider rezonings without triggering the need for a Place Strategy to precede decisions.

- 'Discourage rezoning for residential or rural residential development, other than:
 - Land in an existing urban zone (e.g., intensification)
 - Land with a Gateway Approval, or
 - Adjustments contiguous to an active Urban Release Area.'

Ideally, this approach should not apply within a suitable buffer around any urban zoned land (whether developed or not). That change would serve a dual purpose: to allow for urban boundaries to be adjusted, and to manage the adverse impacts of heavy-vehicle-reliant activities on current or future residential areas.

We therefore request the HEX Corridor Growth Area boundary is re-aligned for the Allandale Interchange as shown on

Figure 1, which serves to allow the continuation of planning for and around:

- The Lochinvar URA, by removing Belford's consolidated landholding and remaining land to the east of Allandale Rd and north of the heavy rail line, and
- The Branxton-Greta area, by removing land associated with our client's consolidated landholding.

Planning for these areas should instead progress in line with the New England Highway Corridor either as a regional planning priority or, where relevant, a separate regionally significant growth area.

Other modifications have also been shown to remove overlapping considerations for the adjoining Hunter Valley Vineyards Regionally Significant Growth Area to the south.

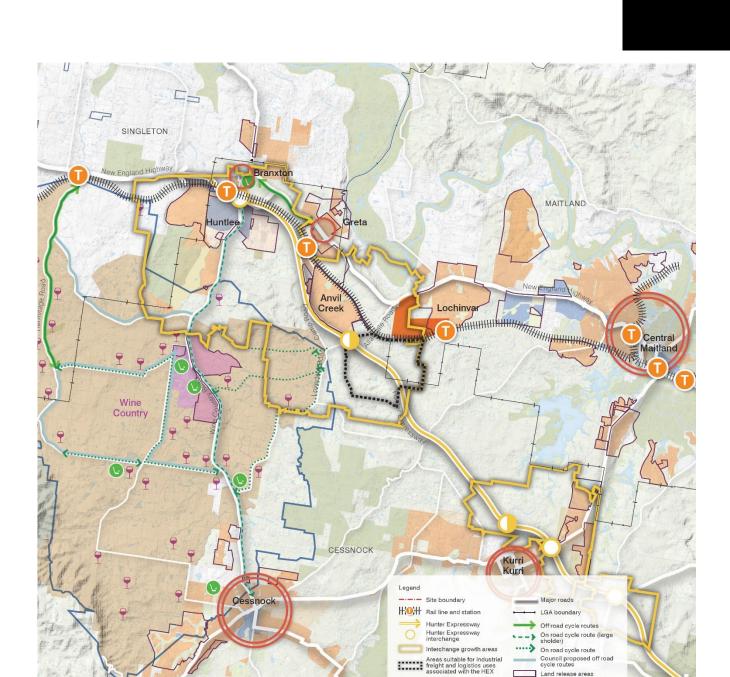


Figure 1: Boundary revision considerations for the HEX Corridor Growth Area boundary around the Allandale half-interchange

RU4 zoning

SP3 (Tourist) zoning

Critical industry cluste

Business zones Residential zones Belford landholdings Lochinvar Public recreation



This boundary modification would not compromise the stated purpose of the HEX Corridor Growth Area and HEX Principles, for the reasons below.

HEX Principle	GYDE Comment
Maximise accessibility through the existing interchanges to maintain connectivity and productivity across Greater Newcastle.	With suitable planning, the growth beyond the existing zoned capacity that could be achieved through enhancements or extensions to the Lochinvar URA and Greta-Branxton growth areas would not have a catastrophic impact on the HEX interchange capacity at Allandale. Impacts can be mitigated by increasing the self-containment of these areas through the provision of services and employment opportunities in the town centre and rail precinct, public transport investments (reliant upon a critical mass) and improved local road connectivity to reduce reliance on the State Road network for shorter trips.
Protect high value land adjacent to each interchange for industrial and freight and logistics uses.	The areas requested to be removed from the boundary to the north of the heavy rail line are not supportable on planning grounds for the types of industrial and freight and logistics uses that the HEX Growth Area is aiming to facilitate. This area is sandwiched between Lochinvar and Greta, where the priority should be to maintain residential amenity and provide an urban break. If it were to be used for those purposes, the heavy-vehicle traffic would ultimately rely upon the New England Highway rather than the HEX - the area is only accessible to the HEX via a railway underpass with height restrictions and is only served by a half-interchange with no convenient connections to the Upper Hunter via the HEX.
	Areas requested to be removed to the west of the interchange serve as visual gateways to the Hunter Valley Vineyards District. The design of the HEX interchange was adjusted to minimise visual impacts to this area, so this area would also not be supportable for the types of industrial and freight and logistics uses that the HEX Growth Area is aiming to facilitate.
Protect the operation of the Hunter Expressway by limiting the encroachment of sensitive	Development of this land north of the heavy rail line for urban uses would not represent encroachment to the operational footprint of the HEX.
residential uses.	The future residential development in the Anvil Creek area which had already been approved when the HEX was designed, and mitigative measures have already been incorporated into the road corridor.

CONCLUDING REMARKS

Regional plans not only set the framework and directions for strategic land use planning they also serve to influence investment decisions within the Region. The implications the apparent fundamental and material changes proposed in the *draft Hunter Regional Plan 2041* described in this submission warrant careful consideration before the Plan is finalised to avoid undue impacts to investment certainty and confidence and to avoid jeopardising the successful implementation of regional-level planning priorities.

This submission offers a range of recommendations that would improve the delivery capacity of the draft Plan and maintain the integrity of the adopted Plan. These are provided to ensure the Planning System can remain agile and assist planners at all levels to make sensible and incremental changes that will serve to maintain the relevance of planning frameworks for local areas, sub-regions, and corridors over time. This agility is critical to leveraging the Hunter's multitude of assets and opportunities and maintaining its status as the State's most important contributor to housing delivery outside metropolitan Sydney.

On behalf of my client, I thank you for your consideration of the matters raised in this submission, and we would welcome the opportunity to discuss the issues raised herein as you work to finalise the Plan.

From:

To:

DPE PSVC Hunter Mailbox

Subject: submission to draft Hunter Regional Plan 2041 (1/2)

Date: Friday, 4 March 2022 3:20:30 PM

Attachments:

Attn: Hunter Regional Plan Team

has prepared the attached submission, which is the first of 2 separate submissions on behalf of . Please treat this as a confidential submission.

We would welcome the opportunity to discuss the issues raised in our submission with you in more detail as you prepare the final Hunter Regional Plan - please do not hesitate to contact me using the details below.

On behalf of my client, I thank you for your consideration of the matters raised. Kind regards,



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04 March 2022

Hunter Regional Planning Team NSW Department of Planning and Environment hunter@planning.nsw.gov.au

RE: draft Hunter Regional Plan 2041 (Viticulture Growth Area)

has prepared this submission to the *draft Hunter Regional Plan 2041* on behalf of Our client is a major strategic landowner and developer in the Hunter Valley delivering a variety of town centre renewal, residential, large lot residential, rural lifestyle and small-lot viticulture, and tourism uses across landholdings at Lochinvar, Anvil Creek, Branxton, North Pokolbin, and Lower Belford (within the proposed Greater Newcastle, Central Hunter, and Hinterland districts).

We understand the *draft Hunter Regional Plan 2041* is the first 5-yearly update to the inaugural *Hunter Regional Plan 2036* released in 2016. Our submission addresses certain elements of the *draft Hunter Regional Plan 2041* that appear to go beyond updating the existing Plan and would introduce fundamental and material changes in practice. In our view, the implications of these elements warrant careful consideration to avoid unduly diminishing investment certainty and confidence across both the private and public sectors, and to avoid jeopardising the successful implementation of longstanding regional-level planning priorities.

Our client supports the recognition of the Hunter Valley Vineyards as a regionally significant growth area, particularly given the scale of its economic contribution and the need for cross-jurisdictional collaboration. This submission recommends the following changes to the associated Regionally Significant Growth Area for consideration.

- 1. The planning directions for the Vineyards District should be updated to reflect local-level planning within the Singleton LGA. The written context, intent for future planning and the mapping provided in the draft Hunter Regional Plan 2041 currently reflect Cessnock's interests only. This omits the important role that the Hermitage Rd area plays as a key gateway into the district.
- 2. The housing demands arising from the Vineyards District should be considered in conjunction with growth area planning. One of the key findings of the NSW Regional Housing Task recommended a greater investment in up-front strategic planning, with greater emphasis placed on considering the impact of major regional projects on local housing markets in early planning phases. The Vineyards District serves as a major tourist attraction and employment area, with far-reaching influences on housing demands. There is currently a shortage of housing available in suitable locations or price-brackets for the workforce upon which the area relies which tends to reflect more casualised positions. This is compounded by the conversion of residential stock to short term rental accommodation. Directing residential subdivision away from the vineyards district relies on finding suitable areas for investment in housing growth in other areas (e.g., Greta-Branxton) to meet these demands.
- 3. The HEX Growth Area boundaries around the Branxton-Allandale interchanges should be redrawn. These interchange areas, combined, cover around 9,400ha of land, or roughly three-quarters the size of the Western Sydney Aerotropolis. Flagging such a vast area at best confuses and at worst contradicts other regionally relevant planning priorities including the vision for the Hunter Valley Vineyards. Land already flagged as within the Hunter Valley Vineyards District (reflected by the RU4 land use zone) or otherwise



within the mapped Critical Industry Cluster for viticulture does not have the capacity to accommodate development of a nature or scale that would jeopardise the functionality of the HEX corridor. These areas are also unsuitable for the types of industrial, and freight and logistics uses that the planning approach for the HEX is intending to accommodate. More broadly, re-drawing the boundaries to signpost more clearly a realistic a quantum and locations for the industrial and freight and logistics uses that the HEX strategy is seeking to protect would provide greater certainty for future investment.

We would welcome the opportunity to discuss the issues raised in our submission with you in more detail as you prepare the final Hunter Regional Plan - please do not hesitate to contact me on to discuss this further.

On behalf of my client, I thank you for your consideration of the matters raised in this submission





EXECUTIVE SUMMARY

has prepared this submission to the *draft Hunter Regional Plan 2041* on behalf of It specifically considers the place-based changes introduced for the Viticultural Growth Area, compared with the adopted *Hunter Regional Plan 2036*.

Planning establishes the framework in which economic activity can exist. Certainty is critical for investment to be made that supports economic activity. While it is acknowledged that sometimes changes in plans are necessary, such changes should be carefully considered so they do not have material unintended consequences on future growth and investment.

This submission offers a range of recommendations for consideration that would improve the capacity to deliver the desired outcomes described in draft Hunter Regional Plan 2041 and maintain the integrity of the adopted Regional Plan and relevant Local Plans.

All recommendations made in this submission are summarised below.

LONG-TERM PLANNING CONSIDERATIONS WITHIN THE SINGLETON LGA

The **Smaller Lot Vineyards and Tourism Precinct** centred around Hermitage Rd should be mapped and described in the final Plan. Council has endorsed additional development potential to be realised here to contribute to the economic viability in the vineyard and tourism industries. Land within this Precinct has either already been subdivided or is supported for subdivision down to 10ha, offering a unique opportunity in the context of the wider Viticulture Growth Area / Hunter Valley Vineyards District.

Gateways into the Vineyards District should also be mapped and described in the final Plan. This submission provides the location for these as relevant to the entry via Hermitage Rd. The purpose of identifying these at a regional level is to provide a context for cross-jurisdictional considerations relating to land use, road/traffic management, wayfinding signage, scenic landscapes, and architectural responses.

UP-FRONT PLANNING FOR HOUSING

The final Hunter Regional Plan 2041 should place greater emphasis on enabling and expediting new housing supply as it relates to the Viticulture Growth Area, because:

- The Vineyards District is a major employment area for the region.
- Business confidence and growth within the Vineyards District relies on access to labour.
- Housing for the casual and seasonal workers sustaining business the Vineyards District in is in short supply,
 and
- The demand for visitor accommodation competes with the creation of new housing supply.

These considerations should also be read in conjunction with the context for planning and delivering development in the Hunter provided in a separate submission on behalf of Belford. That submission provides an analysis of the market context of the draft plan and establishes that the Hunter Region is the most important contributor to housing delivery outside metropolitan Sydney. It also identifies that this is a longstanding trend that has been accelerated by the COVID-19 pandemic and is likely to continue into the future.

IMPLICATIONS OF THE APPROACH FOR PLANNING AROUND THE HEX

To support the considerations described above, the boundaries associated with the Branxton-Allandale interchanges should be re-drawn to avoid overlapping with planning priorities within the Viticulture Growth Area / Hunter Valley Vineyards District.



LONG-TERM PLANNING CONSIDERATIONS WITHIN THE SINGLETON LGA

The planning directions for the Vineyards District should be updated to reflect local-level planning within the Singleton LGA. The written context, intent for future planning and the mapping provided in the *draft Hunter Regional Plan 2041* currently reflect Cessnock's interests only. This omits the important role that the Hermitage Rd area plays as a key gateway into the district.

Our client is currently progressing a rural subdivision at Hermitage Rd located in the Singleton LGA's portion of the Viticulture Growth Area / Hunter Valley Vineyards District. This is the culmination of years of strategic planning, underpinned by the *Hermitage Rd Pokolbin Planning Study* (adopted by Council in 2014) and the supporting *Hermitage Rd Vineyards District Masterplan*, which accompanied the Planning Proposal to rezone land at 257 Hermitage Rd (our client's site).

The rezoning of 257 Hermitage Road was finalised in 2019 and effectively added the area to the Hunter Valley Vineyards District. It is reflective of Council's support for additional development potential to be realised within the area to contribute to the economic viability in the vineyard and tourism industries.

Several elements of this local-level work should be reflected in the Regionally Significant Growth Area directions for the Viticulture Growth Area, as described below.

- Smaller Lot Vineyards and Tourism Precinct (identified in the Hermitage Rd Vineyards District Masterplan). This area is distinct from the 'strategic agricultural land' category shown in the draft mapping and is also distinct from the large-scale integrated tourism offerings elsewhere in the Vineyards District. Within this precinct, land has either already been subdivided or is supported for subdivision down to 10ha, offering a unique opportunity in the context of the wider Viticulture Growth Area / Hunter Valley Vineyards District. The intent for planning here is to encourage a greater mix of non-agricultural uses (including residential uses) that will serve to activate this entry to the Vineyards District.
- **Gateways**. There are several 'main entry' points to the Vineyards District, including via Hermitage Rd. The Hermitage Rd Pokolbin Planning Study and supporting Hermitage Rd Vineyards District Masterplan recognise the need for gateway treatment, extending from this intersection to the Smaller Lot Vineyards and Tourism Precinct described above. The intended planning outcome within this area relates to considerations for road/traffic management, wayfinding signage, scenic landscapes, and architectural responses. Similar designations could also be afforded to entry points at Wine Country Drive and Lovedale Road, for example.

Figure 1 provides suggested mapping changes for consideration in finalising the *Hunter Regional Plan 2041*. Copies of the relevant reference documents or mapped information in a suitable format (e.g., GIS) can be provided on request.

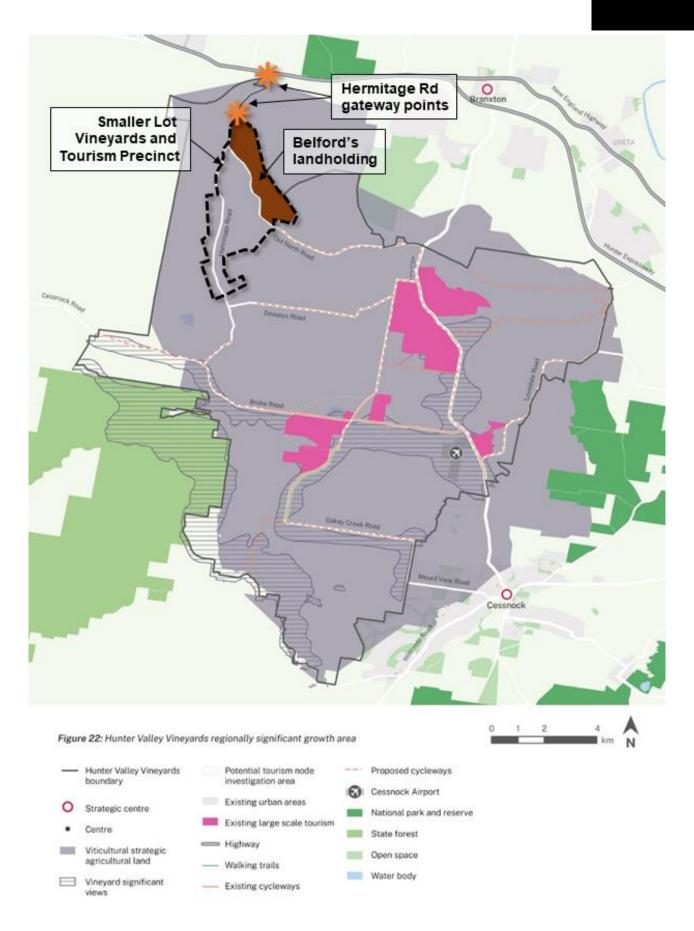


Figure 1: Suggested additions to Regional Plan mapping for the Viticulture Growth Area



UP-FRONT PLANNING FOR HOUSING

One of the key findings of the Regional Housing Taskforce was that 'there is a need for improved upfront strategic planning to resolve issues earlier in the planning process, including better alignment of the work of planning and other State agencies, to ensure that subsequent planning processes can be streamlined, and that development can be timely and well-coordinated.' In relation to this, the report recognises that 'greater emphasis should be placed on be considering the impact of large-scale infrastructure and other major regional projects on local housing markets in early planning phases.'

We acknowledge the introduction of housing demand considerations pertinent to the Williamtown Special Activation Precinct have been introduced as a new Regional Planning Priority within the Greater Newcastle District. A similar priority should be afforded to the Viticulture Growth Area for the reasons outlined below.

- The Vineyards District is a major employment area for the region. The precise number of jobs provided either directly within the Vineyards District or within its supply chain is difficult to evidence. However, estimates have indicated the employment value of wine tourism in the Hunter Valley is between 2,500 3,000.
- Business confidence and growth relies on access to labour. Businesses located within the Hunter Valley
 Vineyards District are overwhelmingly small to medium size enterprises that rely heavily on casual and
 seasonal labour. Job vacancies in the area are at an all-time high (over 180 wine-related jobs are currently
 advertised on SEEK) and we understand many businesses are struggling to operate due to a shortage of
 workers.
- Housing for casual and seasonal workers is in short supply. One of the barriers to accessing labour
 currently is the lack of suitable housing for households working in casualised industries such as hospitality and
 agriculture. The value proposition of working a shift in Pokolbin, for example, needs to consider the associated
 travel costs to the worker.
- The demand for visitor accommodation competes with the creation of new housing supply. The demands for visitor and residential accommodation compete with one another, particularly in the form of short-term rental products (e.g., Air BnB). In our experience, areas that are popular tourist destinations typically need to apply a contingency factor when establishing future dwelling demand requirements, in order to balance the proportion of new properties that will cater exclusively to tourists.

We recommend the final *Hunter Regional Plan 2041* places greater emphasis on enabling and expediting new housing supply, particularly in areas that can achieve new supply in volume and lend themselves to the rental market. This should direct long-term planning to leverage growth around key transport nodes and in centres – such as Greta and Branxton, where urban renewal and revitalisation efforts are underway.



IMPLICATIONS OF THE APPROACH FOR PLANNING AROUND THE HEX

To support the considerations described above, we recommend the boundaries associated with the Branxton-Allandale interchanges are re-drawn to avoid overlapping with planning priorities within the Viticulture Growth Area / Hunter Valley Vineyards District.

We acknowledge the relevance of the HEX as an important freight link within the broader road network. The strategic planning framework for this network is set out in TfNSW's *Freight and Ports Plan 2018-2023*. This document provides a relevant context for the role of State and Local Governments in planning for freight and logistics uses, recognising that: *freight and logistics land, and key corridors, are planned to avoid potential conflict with land uses that are incompatible with freight operations, some of which need to operate 24 hours a day, seven days per week* (p68).

We understand the 'Regionally Significant Growth Areas' identified for each of the proposed Districts are to be the focus for the preparation of Place Strategies overseen by a new Place Delivery Group. In our experience, these types of strategies tend to be implemented through the preparation of new planning controls (LEP, DCP, and development contributions mechanisms) to set or re-set the delivery framework.

The *draft Hunter Regional Plan 2041* nominates the Hunter Expressway Corridor as a Regionally Significant Growth Area under the 'Region-shaping gateways and industry precincts' heading, where the purpose is to coordinate industry growth and secure freight capacity. This purpose is further underpinned by three principles for planning that were previously established in the *Greater Newcastle Metropolitan Plan 2036* to:

- 1. Maximise accessibility through the existing interchanges to maintain connectivity and productivity across Greater Newcastle.
- 2. Protect high value land adjacent to each interchange for industrial and freight and logistics uses.
- 3. Protect the operation of the Hunter Expressway by limiting the encroachment of sensitive residential uses.

In our view, the approach to planning around the HEX Interchanges goes beyond updating the *Hunter Regional Plan 2036* because it introduces a fundamental change to planning practice in areas that had not previously been afforded a similarly detailed focus. Specifically, this approach appears to privilege industrial, and freight and logistics uses over other land uses within the boundaries shown. The Growth Area boundary associated with the Branxton-Allandale interchanges overlaps considerably with the Viticulture Growth Area / Hunter Valley Vineyards District, which is identified under the 'Unique industry opportunities' heading where the purpose of planning is to promote growth leveraging its unique characteristics.

The purposes of planning within the Viticulture Growth Area / Hunter Valley Vineyards District and the HEX Corridor Growth Area are not entirely compatible. In our view, the boundary of the Viticulture Growth Area / Hunter Valley Vineyards District – reflected in existing land use zones and Critical Industry Cluster mapping – is less flexible, warranting a review of the HEX Corridor Growth Area boundaries to balance competing priorities.

For context, when combined, the HEX Interchange Growth Areas encompass around 13,300ha of land, which is larger than the Western Sydney Aerotropolis. Given the magnitude of lands involved, it is important that the approach to planning described at a regional level adds value and clarity to the process of long-term strategic planning.

As currently drawn, the HEX Corridor Growth Area boundary associated with the Branxton-Allandale interchanges encroaches into the Viticulture Growth Area / Hunter Valley Vineyards District:

- To the west of the Allandale half-interchange (south of the HEX). This area represents a visual gateway to the Viticulture Growth Area / Hunter Valley Vineyards District. The design of the HEX interchange was modified to reduce the visual impacts of the road on this area.
- To the south of Branxton / Huntlee (along Wine Country Drive). This area is already largely urbanised as part
 of the staged development of a new town at Huntlee before transitioning to the village of North Rothbury and
 rural residential estates. This area provides a visual and functional transition into the Viticulture Growth Area /
 Hunter Valley Vineyards District.

Should any further changes be considered for the HEX Corridor Growth Area boundary, this approach should also apply to the visual gateway into the Viticulture Growth Area / Hunter Valley Vineyards District at the intersection of the New England Highway and Hermitage Rd.



These boundary modifications would not compromise the stated purpose of the HEX Corridor Growth Area and HEX Principles, for the reasons below.

HEX Principle	GYDE Comment
Maximise accessibility through the existing interchanges to maintain connectivity and productivity across Greater Newcastle.	These areas requested to be removed / avoided from the HEX Growth Area boundary are already prioritised for less intense forms of development through existing controls favouring agricultural and rural industry uses. The intent of planning within the Vineyards District aims to consolidate larger scale uses into identified nodes and centres, which are not positioned in a way that would compromise the operation of the HEX.
Protect high value land adjacent to each interchange for industrial and freight and logistics uses.	The areas requested to be removed / avoided from the HEX Growth Area boundary are not supportable on planning grounds for the types of industrial and freight and logistics uses that the HEX Growth Area is aiming to facilitate. The area around the Allandale Interchange was deemed to have limited capacity to absorb any further development on visual impact grounds when the HEX was designed. The area to the south of Branxton / Huntlee could not accommodate heavy vehicle traffic on top of existing commuter and visitor traffic within the local road network.
Protect the operation of the Hunter Expressway by limiting the encroachment of sensitive residential uses.	The area requested to be removed to the west of the Allandale Interchange is not supportable on planning grounds for residential uses on visual impact / land use compatibility grounds. The area requested to be removed to the south of the Branxton Interchange is already planned to accommodate residential and rural residential uses and further encroachment is not possible. The area requested to be avoided around the Hermitage Rd gateway to the Vineyards District is heavily flood prone and subject to other constraints that would limit land uses. It is unlikely to achieve a level of development that would compromise the operation of the HEX or the New England Highway.



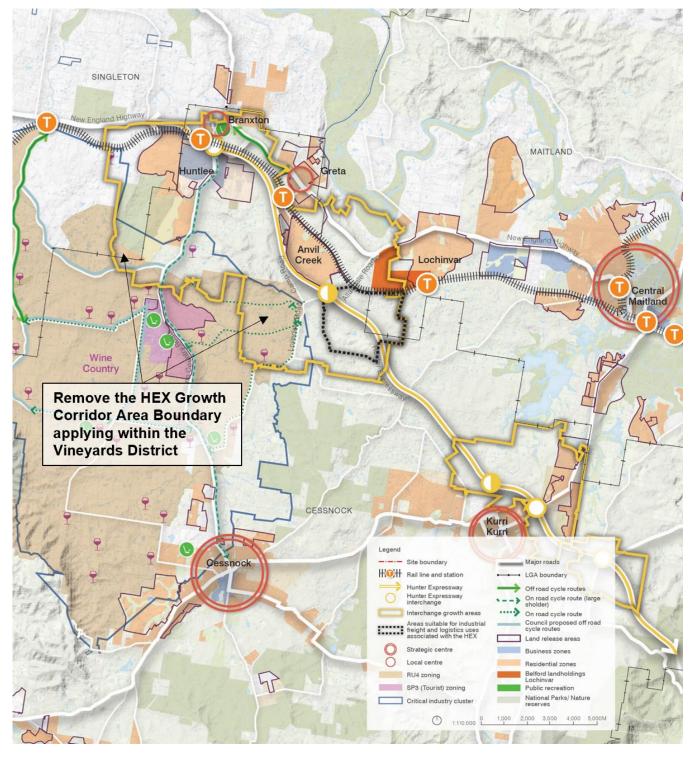


Figure 2: HEX Corridor and Viticulture Growth Area – overlapping boundary considerations

From:
To: DPE PSVC Hunter Mailbox
Subject: submission to draft Hunter Regional Plan 2041 (2/2)
Date: Friday, 4 March 2022 3:20:33 PM
Attachments:

Attn: Hunter Regional Plan Team

has prepared the attached submission, which is the second of 2 separate submissions on behalf of Please treat this as a confidential submission.

We would welcome the opportunity to discuss the issues raised in our submission with you in more detail as you prepare the final Hunter Regional Plan - please do not hesitate to contact me using the details below.

On behalf of my client, I thank you for your consideration of the matters raised.



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04 March 2022

Hunter Regional Planning Team NSW Department of Planning and Environment hunter@planning.nsw.gov.au

Dear n,

RE: draft Hunter Regional Plan 2041

has prepared this submission to the *draft Hunter Regional Plan 2041* on behalf of two of our clients, who are adjoining landowners in the Pacific Palms – Charlotte Bay – Smiths Lake area of the MidCoast Local Government Area (LGA). Their landholdings collectively extend to around 480ha between the Lakes Way, Smiths Lake, and the coastline.

Direction 6 of the existing *Hunter Regional Plan 2036* sets out regional-level intentions to 'Grow the economy of MidCoast and Port Stephens', acknowledging these areas' shared attributes. A key focus of this direction is to facilitate tourism projects that serve to diversify the tourist offering, leverage the accessibility that the Pacific Highway and The Lakes Way afford. These sentiments are broadly reflected in the *draft Hunter Regional Plan 2041* under the district Planning Priorities set out 'Coastal District'.

We understand the 'Regionally Significant Growth Areas' identified in the *draft Hunter Regional Plan 2041* for each of the proposed Districts are to be the focus for the preparation of Place Strategies overseen by a new Place Delivery Group. In our experience, these types of strategies tend to be implemented through the preparation of new planning controls (LEP, DCP, and development contributions mechanisms) to set or re-set the delivery framework. We strongly support the approach described, which commits the necessary public sector resources and a forum to convene key stakeholders relevant to the planning and delivery context.

This submission requests the Pacific Palms – Charlotte Bay – Smiths Lake area shown in Attachment 1 is considered for inclusion as a Regionally Significant Growth Area in the final *Hunter Regional Plan 2041* within the Coastal District to support the following outcomes.

- Providing a nature-based platform for visitation, recreation, and education driving the creation of new jobs. The area is one of the most highly visited locations in the MidCoast. A suitable planning framework is needed to attract investment in new projects that could change the game for regional tourism and recreation.
- Protecting wildlife corridors and supporting Koala conservation and recovery. The development approval process facilitates mechanisms to protect lands in-perpetuity and stimulate funding for investment in conservation (e.g., as a form of biodiversity offsetting).
- Improving access to jobs and services for existing and growing communities, increasing self-sufficiency and resilience. Council strategies dating back to 2006 have recognised the dispersed communities within the Pacific Palms and Smiths Lake area are far enough from Forster-Tuncurry to generate independent demand for facilities and services, including health, education, and cultural or recreational services. These can be appropriately delivered across the area's various urban and rural precincts but rely on a collective vision to be asserted by Government and supported by a forward-looking planning assessment framework reflected in the LEP and DCP.





- Creating certainty for investment. Due to the nature and extent of development constraints, (including considerations for environmental factors and infrastructure networks), there is limited land available that would be suitable for development. Government leadership is required to provide certainty as to the preferred ultimate use for any relatively unconstrained land and to optimise planning outcomes within this supply. Government leadership is also required to coordinate mechanisms to fund and deliver infrastructure, and to establish the area-wide benchmarks that would be expected from the private sector when planning for hazards, and environmental conservation. This includes providing directions, and supporting policies and processes, for implementing environmental and community protection measures in line with development to achieve landscape-scale outcomes.
- Establishing a basis for planning the future housing supply required to meeting the communities housing needs and expectations. While Council has indicated that additional housing is not a priority within the Pacific Palms Charlotte Bay Smiths Lake area at present, a place-based strategy would serve to provide greater transparency in the planning process going forward. This is particularly important in areas where visitor demands have the potential to unbalance residential housing supplies, and interventions are required to adequately balance competing needs.

MidCoast Council staff resources are limited, and we understand the capacity for a Place Strategy of this nature to be prepared locally is hampered by other competing priorities. Elevating this area to regionally significant in the final *Hunter Regional Plan* would enable Council to leverage support from DPE and provide a platform for relevant State agencies to provide meaningful input at the earliest possible stage. This level of public sector resourcing and attention is critical for areas such as this one, where change relies on multiple and complex approval processes and delivery mechanisms. It may also provide the forum to establish public-private partnerships.

For example, we understand that the NSW Government's conservation investment priorities are no longer focused on expanding the State-owned network of National Parks and State Conservation Reserves in coastal areas like this. Instead, the priority is to raise conservation credits through private stewardship agreements to ensure sufficient conservation lands are available to offset the biodiversity impacts of urban and economic developments. That means deriving the above outcomes in an orderly and cost-effective manner will rely almost entirely on the participation and buy-in of individual landowners. It also underscores the importance of Government leadership as paramount to enabling, promoting, and coordinating these iconic activations to create a diversified employment base that meets the needs of community, reflects the area's natural amenity, and aligns with the values of the MidCoast.

On behalf of my clients (undersigned), I thank you for your consideration of the matters raised in this submission.

Please do not hesitate to contact me on	to discuss this further.



ATTACHMENT - REGIONALLY SIGNIFICANT GROWTH AREA CONSIDERATIONS

The MidCoast is marketed as the 'Barrington Coast Destination'. The Great Lakes area within this is renowned for its pristine coastal lakes and swimming and surfing beaches. Our clients' properties are located just off The Lakes Way, which is a renowned scenic tourist drive (Tourist Drive 6), well-positioned to provide unique and landmark visitor experiences in line with regional-level directions. The Place Strategy for a Pacific Palms – Charlotte Bay – Smiths Lake Regionally Significant Growth Area would be pursued as a 'unique industry opportunity', promoting growth that leverages its unique characteristics. Council's *Destination Management Plan* encourages the private sector to consider several 'gamechanger' projects within in the Great Lakes area, many of which (listed below) could be suitably accommodated within our clients' landholdings or the immediate vicinity.

- **Great Lakes Great Walk and Aquatic Trail.** Our clients' properties could form part of the 100km coastal investigation area stretching from Forster to Hawks Nest.
- **Great Lakes Eco-lodge.** Council's plan prefers this to be located somewhere near Blueys Beach, offering ocean or lake views and be easily accessible from the proposed Great Lakes Great Walk and Aquatic Trail.
- Smiths Lake Eco-Village. Council's preference is for this to be located on the ocean-side of Smiths Lake to attract sustainably-minded visitors. The project is envisaged to include public spaces to host activities such as a local farmers market, as well as the infrastructure and amenities to support hiking (e.g., paths, lookout points), kayaking, and surfing.
- **High Ropes Adventure Park.** Council flagged this type of project to strengthen the area's nature and adventure-based offering but did not specify a particular location. This area has the tall-trees and sufficient space to develop a high ropes course, and the area already attracts adventure minded visitors.
- Centre of Excellence for the Environment and Wetlands (Smiths Lake). This was proposed as a public-private collaboration project to showcase and reinforce Council's commitment to environmental sustainability while also demonstrating the link between conservation and productivity.
- Aboriginal Health & Wellbeing Retreat. The MidCoast area is situated on the traditional lands of the Biripi
 and Worimi people. Council flagged this type of project to strengthen the visitor economy while simultaneously
 benefitting the local Aboriginal community. One type of product described is an 'Aboriginal Health and
 Wellbeing Retreat' involving the cultivation of native plants to create spa-treatment products as well as unique
 food experiences.

In addition to the above, a key strategy outlined in Council's *Community Strategic Plan* is to ensure that community, sporting, recreational and cultural facilities and services reflect current and future needs. The NSW Office of Sport has 10 **Sport and Recreation Centres** in NSW, set in scenic river, beach, bush or alpine locations. There are currently no Sport and Recreation Centres located on the coast north of Lake Macquarie. In our view, the Great Lakes would be an ideal location for this type of facility (subject to collaboration with the NSW Office of Sport).

We have also made submissions to Council recently asking for a review of the housing needs for this area. Our review of the evidence presented in Council's *Urban Land Monitor*, and *Urban Release Areas Study* has revealed apparent inaccuracies that warrant further investigation – particularly in light of the recommendations of the Regional Housing Taskforce – to ensure communities in the Pacific Palms – Charlotte Bay – Smiths Lake area are not being unduly disadvantaged. The preparation of a Place Strategy would assist with expediting and afford a level of independence to those investigations.

We recommend the study area for the Place Strategy encompasses all land east of The Lakes Way, south of Boomerang Drive (excluding properties along the northern frontage) and accessed via Sandbar Road (including properties along the southern frontage), as shown in Figure 1. We estimate MidCoast Council and our clients collectively control approximately 3/4 of the recommended study area, as shown confidentially in Figure 2. Several site-specific technical studies prepared in recent years to support Planning Proposal and/or master planning work are already available to either directly inform the Place Strategy or to otherwise assist with setting the scope of further investigations.



Figure 1: Recommended Place Strategy boundary (base map sourced from SIX maps)

The regional relevance afforded by acknowledgement in the *Hunter Regional Plan* would provide access to public sector resources that are not always as responsive to Council or landholder requests. In addition to DPE, the project reference group could bring together representatives for various interests as follows to enable a more streamlined cross-jurisdictional planning, impact mitigation, and delivery framework (not exhaustive and in no particular order).

- Local Planning and asset management covering local planning authority, local infrastructure (road, water supply, and sewage treatment assets), economic development, biodiversity planning and estate management (MidCoast Council)
- State transport infrastructure including The Lakes Way Regional Road and Maritime / boating infrastructure (TfNSW)
- Biodiversity approvals and offsets (NSW Environment, Energy and Science)
- Forster Local Aboriginal Land Council
- National / State conservation estate management (National Parks and Wildlife Services Estate)
- Port Stephens-Great Lakes Marine Park estate management (Department of Primary Industries)
- Sport and Recreation Centre planning (Office of Sport)
- Emergency management and Response (e.g., Rural Fire Service, Fire and Rescue, SES, and Ambulance Service NSW)
- Other utility providers (Telstra, Essential Energy)

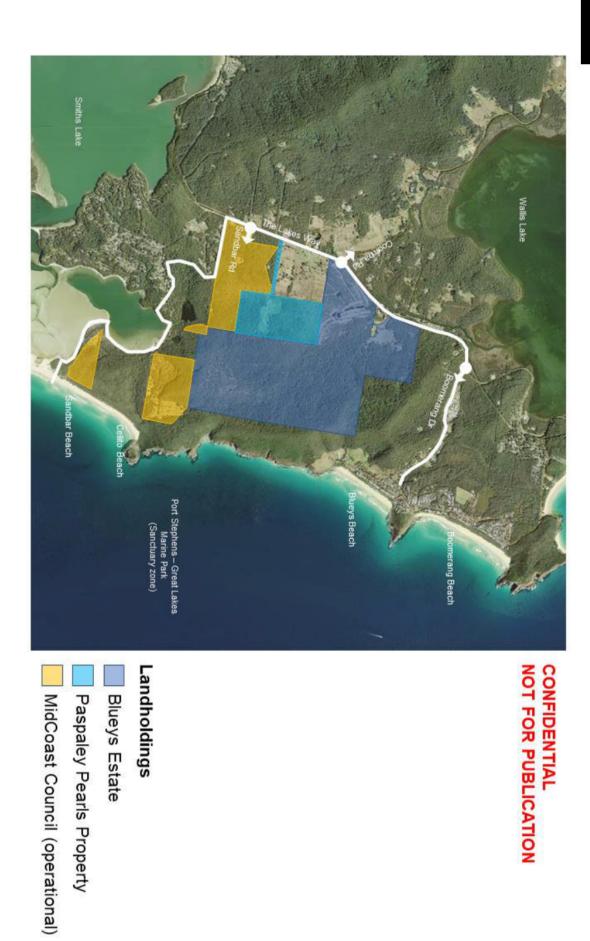


Figure 2: CONFIDENTIAL Major consolidated landholding coverage of recommended Place Strategy area



From:

To:

DPE PSVC Hunter Mailbox

Subject: Date:

Friday, 4 March 2022 3:25:34 PM

Attachments: image001.png

mage002.png

Attn: Hunter Regional Plan Team

has prepared the attached submission as a joint submission on behalf of Please treat this as a confidential submission.

We would welcome the opportunity to discuss the issues raised in our submission with you in more detail as you prepare the final Hunter Regional Plan - please do not hesitate to contact me using the details below.

On behalf of my client, I thank you for your consideration of the matters raised. Kind regards,



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Response to Draft Hunter Regional Plan 2041

due 4th March 2022

Acknowledgement to Country

We acknowledge the traditional custodians of the land on which we work and live, the Gathang speaking people and pay our respects to all Aboriginal and Torres Strait Islander people. We extend our respect to elders past and present, and to all future cultural-knowledge holders.

Introduction

is part of the

We commenced operations in December 2020 and have been supporting tertiary students living in the MidCoast LGA since January 2021. Our vision is "connecting people to learning and opportunities close to home". Our doors are open to any tertiary student residing in the MidCoast and among our aims is improving the participation and completion rate, in tertiary education, among MidCoast residents.

It is our firm belief that tertiary education can become a key driver for economic recovery and resilience and for positive social and economic regeneration and development for the MidCoast. As we're already seeing elsewhere, expanding education opportunities can dramatically increase the competitiveness, vibrancy, and economic self-reliance of a region. Education and learning are the foundation of future development, with enduring economic implications; key to addressing local skills shortages, retaining local talent, and ultimately attracting skilled professionals to the MidCoast as quality of life, standards and cultural expectations are raised.

Therefore, it is our view that education must be recognised as a 'pillar' in the Hunter Regional Plan.

Overview

We recognised that this is primarily a land use plan, an infrastructure first, place-based approach to development planning working towards a better and more coordinated planning system. We also acknowledge the difficulty of defining and implementing a plan for a region as geographically large and with such a diverse economy as the Hunter. However, this is the sole plan we have for the region to which MidCoast belongs, thus some additional objectives, aspirations and plans for people living in the region, including educational equity and opportunities, is sought.

The Planning NSW website asserts that 'The Hunter Regional Plan is the 20-year strategic planning blueprint to ensure a sustainable future and the ongoing prosperity of the Hunter's vibrant and connected communities' (https://www.planning.nsw.gov.au/hunter-region). Accordingly, the regional plan requires some emphasis on the knowledge economy and education, so as they are not overlooked as the imperative economic 'engines' in the region. While we commend many of the Plan's approaches to long-term regional planning its focus on land use, places and infrastructure does not account for many of the important and essential uses of places, infrastructure and facilities by people, or recognise and address the skills shortages in regional areas and the priority of access to education as a critical strategy for improving regional outcomes.

Access to education and learning are the foundation of future development, with enduring economic implications. This raises standards and improves the quality of life in regional communities. Educational facilities are key to addressing local skills shortages, retaining local talent, and ultimately attracting skilled professionals to our region in the MidCoast.

Northern Borders of the Hunter Region

MidCoast LGA is geographically distant from other more populous areas of the Hunter Region, especially Newcastle to the far south.

Page 12 identifies interconnection between Hunter and Central Coast regions. However, the MidCoast is the northernmost LGA within the Hunter Region with essentially no close linkages with the Central Coast Region. Instead, it aligns with the Hastings LGA and other LGAs to the north.

Thus, we would like recognition of the strong links of the MidCoast to the regions extending past the northern boundaries of the Hunter Region. The northern boundary line should not terminate a broader view in the same way that the southern boundary does not exclude inter-region connectivity.

Secondly, the north-western part of the MCC (the previous Greater Taree and Gloucester LGAs and the area referred to in this draft plan as 'Barrington') is in RDA Mid North Coast while the previous Great Lakes LGA is in RDA Hunter. Further, the Plan refers to the business and commercial centre of Taree almost as an afterthought in its description of the Barrington district.

We are also puzzled by the choice of 'Barrington' as the district name. Barrington Coast was adopted for tourism purposes, with reference to the huge area of the MidCoast LGA – over 10,000 square kilometres from Barrington Tops National Park to the west of the LGA to the coastal – and primarily tourism – areas, including Forster-Tuncurry, Hallidays Point, Old Bar and Harrington which are within the Plan's 'Coastal' district. We suggest reference to Barrington district and the importance of Taree be reframed in the Plan.

Regional Plans support funding opportunities

Regional plans are an important reference point for applicants preparing submissions for State and Federal government grants.

Our experience is that such applications need to demonstrate that they align with regional plans. For example, the most important assessment criterion for funding through the 2020 Local Bushfire Economic Recovery Fund supported by both the State and Federal Governments was that the project was 'in alignment with regional objectives'.

Unfortunately for , these factors could not be demonstrated with reference to regional plans. Our application was unsuccessful. Feedback offered directly to by the State Government Department of Regional New South Wales was that this failure to satisfy Criterion 1 of assessment essentially ruled us out of contention for funding at first base.

Accordingly, believes it is imperative that the importance to MidCoast LGA of educational opportunities (including at tertiary level) be identified in strategic plans at the regional level.

Access to education and learning - the foundation of future development

Equity in educational opportunities and communications (digital and intra-district travel) is imperative for achieving Objectives 2, 7 and 8 of the Draft Plan.

'Lifestyle opportunities, creating great places, enriching community character, unlocking sustainable growth opportunities' (page 8) are all dependent on having educational opportunities, especially for tertiary qualifications.

Research by the National Centre for Student Equity in Higher Education (NCSEHE) states "While positive parental and peer expectations for higher education, including well-resourced schools can ameliorate significant background disadvantage (Gemici et al., 2014; Redmond, Wong, Bradbury, & Katz, 2014; Sullivan, Perry, & McConney, 2013), community infrastructure still looms large as an enabling factor in the decision to access higher education" https://www.ncsehe.edu.au/wp-content/uploads/2017/09/NCSEHE-Response-to-RRR-Review 2017.pdf

UN Sustainable Development Goal No 2 as stated within the draft Plan is to reduced inequalities; to address this goal regions must have access to educational opportunities.

The Draft Plan also states the Principle of Growth is '... to foster employment growth, competitiveness and innovation.' This principle requires access to an educated work force.

A further stated principle is Equity: 'Communities should be safe and healthy with residents having opportunities for economic advancement ...' this is again hugely dependent on access to education. This is further reinforced as a requirement on page 31 of the Draft Plan, as a factor influencing a person's health.

Page 11 states Big ideas (included) in the new draft plan:

- New pathways to promote economic self-determination and greater recognition and respect
 of traditional custodians, along with greater connection with Country and integrating
 Aboriginal cultural knowledge and practice into urban design and planning. These pathways
 must include improved educational opportunities.
- Reinforcing the importance of equity so that people have greater choice in where and how they live, how they travel and where and how they work. Also need equity in where and how they attain tertiary educational qualifications

Coastal district

Currently Taree is the business and commercial centre for the Coastal District (excluding Nelsons Bay) although this does not appear to be recognised/commented upon in the draft plan, i.e. there is no reference to the function of Taree and the dependence of coastal communities on it. It appears that the intent is that Taree would continue to have this role for Coastal district communities, given the somewhat limited style of future commercial development suggested for the Forster-Tuncurry regionally significant growth area. Perhaps, then, the importance of this interconnectedness be recognised.

Table 1: Responses to specific references in the Draft Plan

Page number	Reference	Response	
Page 9	includes Plan Principles to: Foster Employment Growth, and Residents having opportunities for economic advancement	Both principles relate to improved access to education - but this is not stated	
Page 10	The audit of the Hunter's 140 planning proposals planning between October 2016 and January 2021, recommend among other points: • more planning direction for hinterland areas;	Skills shortages in regional areas needs to be recognised Access to education needs to be addressed as a key strategy for improving hinterland areas	
PAGE 11:	What are the big ideas in the new draft regional plan? Equity and choice are mentioned but only in relation to living, working and travelling	Education is not mentioned and needs to be considered as a choice, with equitable access assured	
Page 14:	States the regional vision , and includes:	Is this vision strategically available for the towns and villages of the MidCoast Council in the timeframe of this regional plan?	
Page 17 Hunter urban development program committee includes Infrastructure & service providers, and Industry and professional stakeholders		An oversight that University of Newcastle is not included	

Page 17	'Development proposals should seek to grow "smart" industry sectors that offer high economic value and low environmental impact. This will require flexible accommodation and work arrangements focused on digital infrastructure and multi-use work spaces of various sizes and price points.'	Infrastructure and service providers do not appear to include digital communications providers Plan is centred round land use planning and timely provision of infrastructure. Need to address internet connectivity, recognising where it's poor or even non-existent at the moment Reliance on digital infrastructure /internet is vitally important as demonstrated during fires, floods and pandemic. Also for online learning, again as brought to the fore by COVID but also essential for tertiary students studying online.	
Page 20	'Making It Happen' States Focus investment to enable vibrant place outcomes and local jobs	Reference to education as a strategy needs to be included	
Page 20	Taree identified as a 'regionally significant growth area'; focus of investment to enable vibrant place outcomes and local jobs	Tertiary education is important for jobs and outcomes. ?	
Page 20	Secure Freight Capacity	Northern gateway project at Taree needs to be noted as enabling 'Region-shaping gateway and industry precincts'	
Page 28	Objective 2: ensure economic self- determination for Aboriginal communities	Within Strategy 2.1 – building capacity for Local Area Land Councils to have access to education is important for achieving this objective	
Page 29	15 Minute neighbourhoods Capitalising on these behavioural shifts requires a rethink of the role and function of local neighbourhood centres to improve local services and public places or to encourage a greater mix of shared facilities, smart work or co- working hubs, education facilities, health services, or community and social services.	'online education' options provide a solution in the 15 minute travel strategy	
Page 30	Reducing Car Dependency Creating built environments that encourage people to walk, cycle, take part in physical activity, use public transport and interact with the community will contribute to lifelong health and wellbeing.	Insert the word 'learning' as follows: community will contribute to lifelong learning, health and wellbeing	

Page 30	Objective 3: Create a 15 minute region made up of mixed, multimodal, inclusive and vibrant local communities	Cannot be applied in the main to MidCoast district because of its geographic spread. Note that with Taree as a 30(+) minute strategic centre, secondary and tertiary education facilities have been listed as components. However, most of the approximately 93,000 residents of the MidCoast LGA live more than 30 minutes by private transport from Taree.
Page 31	A range of factors influence a person's health. As well as individual characteristics such as age and gender, these factors include education, employment, housing, access to food and social infrastructure	Important to emphasise and include more about education in the built environment
Page 39	Objective 4: Plan for "Nimble Neighbourhoods", diverse housing and sequenced development	Limited applicability to MCC LGA - identified for 30% infill; 70% greenfield
Page 40	Мар	The map needs to be amended to identify Old Bar and Bulahdelah as urban centres
Page 43	Strategy 4.8 :Prioritise and support independent living services, including respite care, nursing and personal care, food access and delivery, and transport services, that enable people with disabilities to live independently in the community	This strategy needs to include access to tertiary education for people with disability.
Page 48	Objective 5: Increase green infrastructure and quality public spaces and improve the natural environment Sustaining regional habitat connectivity	No mention of environmentally protected (biodiversity) areas to the north and north-west of MCC LGA that are part of a wildlife corridors into other regions. Recognition of our interconnectedness and the need to protect biodiversity does not stop at our northern boundary.
Page 53	OBJECTIVE 7: Plan for businesses and services at the heart of healthy, prosperous and innovative communities	Access to education as a strategy to ensure prosperous innovative communities needs to be mentioned There's a need for educational and training facilities to provide the workforce to achieve vibrant centres and main streets, a night-time economy, support tourism.

Page 56	Strategy 7.4 Development proposals shall aim to co-locate complementary activities with major tertiary education and health facilities, creating a core of high-level health, education, research, or similar facilities. Quality healthcare facilities should be able to adapt to meet new models of care.	Reference needs to be made to TUC, University of Newcastle Manning Education Centre, Manning Base hospital upgrade Also noting difficulty in sourcing medical and allied health practitioners.
Page 59	Objective 8: build an inter- connected and globally focused Hunter	Strategies and actions to accomplish - crucial to include access to internet facilities across the region
Page 103	Barrington district 'The Barrington district's community love the rural, quiet and relaxed nature of the area and its proximity to work, cities, family and services.'	The whole of introductory page 103 does not hint at the size or continuing importance of Taree as a 'regionally significant town and growth area'.
Page 105	Around the headwaters of the Manning River, two new locations have been identified as villages at Bundook and Mt George.	These two locations are just to the west of Wingham and some considerable distance from the headwaters of the Manning. The reference needs to 'headwaters' needs to be amended
Page 107	Listing of sites and precincts	Need to mention TUC and importance to economic development and employment prospects. This facility needs to be added as a standalone point. Planned relocation of TUC to utilise the now vacant Greater Taree City Council building, and the options to include accommodation for visiting students
Page 107	Point 7 Regional recreation centre	Need to add: Iron Arena Kiwarrak bike trails
Page 199	Forster-Tuncurry Place Growth Area	Education needs to be stated as a focus in this region

From:

To:

DPE PSVC Hunter Mailbox

Subject:
 Hunter Regional Plan Review - submission attached - portal message error
Date:
 Friday, 4 March 2022 3:27:31 PM

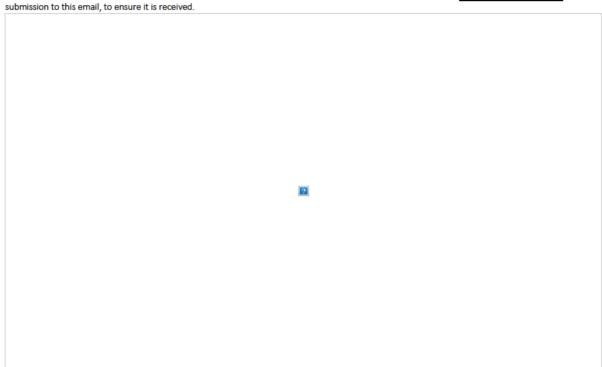
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Hi

I am receiving the message below when attempting to upload the PDF file (attached). The message is remaining despite waiting several minutes for the file to upload.

I have received a confirmation of submission but wasn't certain the file was received through the portal.

I have phoned the contact number provided but have not received a call back so though it may be prudent to attach









We acknowledge the traditional custodians of the land on which we work and live, the Gathang-speaking people and pay our respects to all Aboriginal and Torres Strait Islander people. We extend our respect to elders past and present, and to all future cultural-knowledge holders.

The information in this email is confidential to the named addressee. No one else may read, print, store, copy, forward or act in reliance on all or any of this email or its attachments. If you are not the intended recipient, any use, reliance upon, disclosure or copying of this email is prohibited and unlawful. f you have received this email in error please notify the sender does not warrant that this email and any attachments are error or virus free and recommends that all attachments be checked for computer viruses.

NSW Department of Planning, Industry & Environment PO Box 1226, Newcastle NSW 2300

Delivered to: hunter@planning.com.au

Attention:			
RE:	SUBMISSION TO THE DRAFT HUNTER REGIONAL PLAN 2041		
Dear	,		
The pu	rpose of this letter is to make a submission to the Draft Hunter Regional Plan 2041 on behalf of		

in relation to the property known as the Kotara Home Centre, located at 1 Kullaiba Road, 150 Park Avenue and 14 & 18 Bradford Close, Kotara (the Site). The Site is formally identified as Lot 220 DP 1014716, Lot 501 DP 1174032, Lot 19 DP 786145 and Lot 181 DO 850168. This letter seeks to inform NSW Department of Planning, Industry & Environment (NSW DPIE) of the strategic planning investigations of the site undertaken to date and to implore NSW DPIE to nominate the site as a District Planning Priority in the adopted Hunter Regional Plan 2041.

have undertaken preliminary investigations into the strategic potential of the Kotara Home Centre for revitalisation as a mixed-use Transit Oriented Development (TOD) to facilitate, residential, commercial and recreational land uses. This would include:

- Facilitation (through the appointment of land) of a future relocation of the Kotara Train Station for better integration with high pedestrian areas and surrounding land uses;
- Significant redevelopment of the Kotara Home Centre to enable greater and more effective commercial floor area across the site;
- Enabling suitable residential accommodation to the site in the form of shop-top housing and/or residential flat buildings;
- Provision of public green space and pedestrian infrastructure; and
- Revised road layout and intersection upgrades for more effective integration with Northcott Drive, Park Avenue and broader public road network.

To support this submission, the following documents have been provided which examine conceptual strategies for the redevelopment of the site and preliminary analysis of environmental constraints:

 Attachment 1 - Kotara Transit Oriented Development (TOD) Centre Concept Master Plan (RobertsDay, 2019)

- Attachment 2 Traffic Review: Kotara Homemaker Master Plan (CBRK, 2019)
- Attachment 3 Flood Planning Letter (Costin Roe Consulting, 2019)

It is noted that the Draft Hunter Regional Plan 2041 was placed on exhibition from the 1st December, 2021, to the 4th March, 2022.

1.0 SITE ANALYSIS. LEGISLATIVE CONTEXT AND STRATEGIC CONTEXT

1.1 Site Context & Locality

The land subject to this submission is identified as 1 Kullaiba Road (Lot 220 DP1014716), 150 Park Avenue (Lot 501 DP1174032), and 14 & 18 Bradford Close (Lot 19 DP786145 & Lot 181 DP850168), Kotara. The site has a combined area of approximately 11.8 ha and is located within the Newcastle Local Government Area.

The site is situated approximately midway between the Kotara and Adamstown Railway Stations, at the junction of four residential suburbs, being Kotara, Adamstown, Adamstown Heights and New Lambton. The northern boundary of Lot 501 DP 1174032, Lot 181 DP 850168 and Lot 19 DP 786145 adjoins the Main Northern Railway, and the site is accessed via Northcott Drive which is a State Classified Road.

Table 1 below provides an overview of each allotment.

TABLE 1: SITE OVERVIEW				
Address	Lot	Area	Road Frontage	Direct Access
1 Kullaiba Road	Lot 220 DP 1014716	5.53 ha	Northcott Drive, Kullaiba Road & Park Avenue	Kullaiba Road via signalised intersection with Northcott Drive and signalised intersection with Park Avenue.
150 Park Avenue	Lot 501 DP 1174032	4.12 ha	Park Avenue & Kullaiba Road	Park Avenue via left-turn only intersection.
14 Bradford Close	Lot 19 DP 786145	3,628m ²	Bradford Close	Bradford Close via signalised intersection with Northcott Drive.
18 Bradford Close	Lot 181 DP 850168	1.76 ha	Bradford Close	Bradford Close via signalised intersection with Northcott Drive.

Lot 220 DP 1014716 is spatially separated from the rest of the site by a drainage channel which accommodates the Styx Creek and is split into two portions by Kullaiba Road.

The site currently accommodates the Kotara Home Centre within the portfolio which facilitates various commercial uses such as bulky good retailing, sporting goods, a supermarket, fashion outlets and cafes. The site is anchored by a Bunnings Warehouse in Lot 220 DP 1014716, a Good Guys store in Lot 501 DP 1174032, and a Domayne store in Lot 181 DP 850168. The site comprises extensive at grade car parking facilities and internal road network.

Development immediately adjoining the site comprises other commercial, business and retail land uses. Notably, 100m to the south of the site is the Westfield Kotara Shopping Centre. In addition, St Pius X High School is located approximately 150m to the east of the site.

Figure 1 below illustrates the site's locality. Figure 2 provides an aerial image of the site.

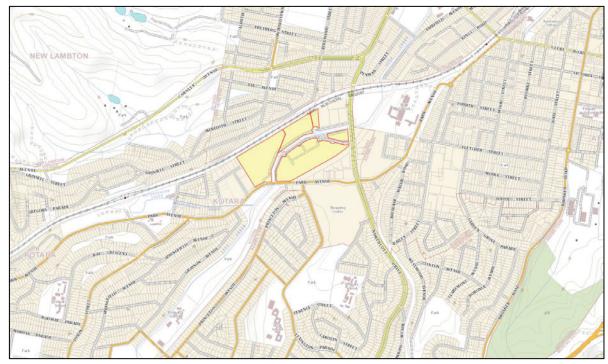


Figure 1. Site Locality Plan (Source: SIX Maps, 2021)



Figure 2. Aerial Photograph (Source: SIX Maps, 2021)

1.2 Local Statutory Planning Context

The site is located within the Newcastle Local Government Area (LGA) and the primary environmental planning instrument applicable to the site is the *Newcastle Local Environmental Plan 2012* (NLEP 2012). Under the NLEP 2012, the site is zoned both B2 Local Centre and B5 Business Development as depicted by **Figure 3** below.

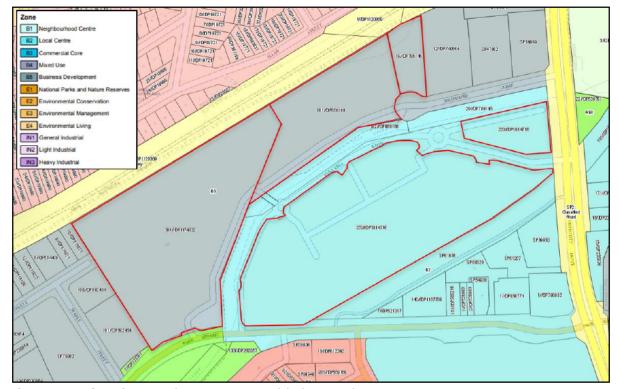


Figure 3. Land Zoning Map (Source: NSW Legislation, 2021)

Permissible land uses within the B2 and B5 zone are summarised in **Table 2** below and key development standards under the NLEP 2012 applicable to the site are identified in **Table 3**.

TABLE 2. POTENTIAL LAND USES PERMISSIBILITY			
Standard Instrument Land Use	Permissibility in the B2 Zone	Permissibility in the B5 Zone	
Office premises	Permissible	Permissible	
Retail premises Including 'shops' (which includes supermarkets).	Permissible	Permissible (excluding pubs, restaurants and cafes)	
Child care centre	Permissible	Permissible	
Car parks	Permissible	Permissible	
Hardware and building supplies	Permissible	Permissible	
Take away food and drink premises	Permissible	Permissible	
Restaurants & Cafes	Permissible	Prohibited	
Health services facilities Including medical centres, health consulting rooms and hospitals.	Permissible	Permissible	
Recreation facility (indoor)	Permissible	Permissible	
Respite day care centre	Permissible	Permissible	
Shop top housing	Permissible	Prohibited	
Seniors Housing	Permissible	Permissible	

TABLE 3. DEVELOPMENT STANDARDS UNDER NLEP 2012			
Clause	Comment		
Clause 4.1 - Minimum Lot Size	The site is not subject to a minimum lot size under the NLEP.		
Clause 4.3 - Height of Buildings	Land within Lot 220 DP 1014716 is subject to a maximum building height standard of 14m. The remainder of the site is not subject to a building height standard under NLEP.		
Clause 4.4 - Floor Space Ratio	Land within Lot 220 DP 1014716 is subject to a maximum floor space ratio standard of 2:1. The remainder of the site is not subject to a Floor Space Ratio standard under NLEP.		
Clause 5.10 - Heritage	The subject site is not identified as an item of local heritage or within the vicinity of an item of local environmental heritage.		
Clause 5.21 - Flood Planning	The subject site is mapped as containing areas of very low, low and medium flood risk by City of Newcastle's online flood mapping. Any future development of the site must consider the provisions of this clause.		
Clause 6.1 - Acid Sulfate Soils	The subject site is mapped as containing potential Class 5 Acid Sulfate soils. Any development likely to lower the water table by more than 1m on nearby Class 1-4 Acid Sulfate Soils will require the preparation of an Acid Sulfate Soils Management Plan.		

2.0 KOTARA TRANSIT ORIENTED DEVELOPMENT CONCEPT MASTER PLAN

Aventus Group have undertaken extensive investigations into the conceptual revitalisation of the Kotara Home Centre to define the strategic potential of the site. Analysis of the economic and development potential of the site and research into the flood risk of the site and the context of the surrounding road network have assisted in the development of a strategic vision of the new Kotara Town Centre as a mixed-use commercial and residential precinct that is underpinned by integrated transit infrastructure. The Kotara Transit Oriented Development (TOD) Concept Master Plan (Attachment 1) outlines the revitalisation potential of the site as illustrated by Figure 4 below.



Figure 4. Kotara TOD Master Plan

Whilst the Kotara TOD Master Plan is conceptual and preliminary in nature, key elements of the Master Plan include the following:

- Demolition of built form within the site;
- The availability of land resources to facilitate the relocation and/or amalgamation of the Adamstown and Kotara Train Stations to adjoining the northern boundary of the site;
- The 'capping' of the drainage channel to unify the site;
- Introduction of mixed-use permissibility's to facilitate the development of shop top housing and residential densities in the vicinity of transport linkages; and
- Revised site layout including new road structure, massing concepts and public recreation areas

It is noted that the Kotara TOD Concept Master Plan represents the first step in the revitalisation process in that it demonstrates a cohesive revitalisation concept for the Kotara Home Centre and its future intent as the New Kotara Town Centre. The Kotara TOD Concept does not represent a final design outcome for the site, however it does provide an indication of the possible revitalisation options that would benefit under a transit-oriented development outcome. Other options to achieve this vision for revitalisation (subject to further investigation) may include:

- Repositioning the larger scale mixed use buildings to the areas south of the site elicit a more retail and recreational open space centric precinct in closer proximity to the train station;
- Alternative road and public open space layouts;
- Alternative mix of land uses that leans away from large format retail towards office/business premises, civic and health related land uses alongside residential formats;
- Etc

To facilitate the future revitalisation of the site, applicable planning controls under the Newcastle LEP 2012 would require amendment under a Planning Proposal process to facilitate land uses, building heights and floor space ratios that are consistent with the vision of the site as mixed-use strategic centre that facilitates both residential and commercial land uses. It is anticipated that this would require the preparation of a future Planning Proposal which addresses the following:

- Rezoning of the northern section of the site to B2 Local Centre;
- Alignment of permissible land uses to achieve the mixed-use Strategic Centre vision;
- Installation of development standards (FSR and height of buildings) that reflect the strategic intention for the site;

The following sections of this submission review the existing research into the site as undertaken by Aventus in the preparation of the Kotara TOD Concept Plan.

2.1 Kotara Home Traffic Review

undertook a Traffic Review (**Attachment 2**) of the surrounding road network to assess two development outcomes for the site:

- Option 1 additional 20,000m² bulky goods plus 500 residential units; or
- Option 2 additional 15,000m² bulky goods plus 1,000 residential units and 60,000m² commercial floor area.

found that the more intensive revitalisation of the site (being Option 2) could be facilitated from a traffic point of view through a combination of road network improvements and improved accessibility to public transport. Appropriately, the intended Kotara TOD Concept Plan can provide significantly improved access to public transport through the intended relocation/amalgamation of Adamstown and Kotara Train Stations to the northern boundary of the site.

2.2 Kotara Home Flood Planning Discussion

In 2019, engaged in flood planning discussions with Newcastle City Council (NCC) and Hunter Water Corporation (HWC) as indicated by the letter attached at **Attachment 3**. Specifically, these discussions revolved around the treatment of the Styx Creek drainage channel that bisects the site and stormwater management options to overcome the constraints presented by this channel. The key points of these discussions are summarised below:

- Whilst HWC are the asset owners of the Styx Creek drainage channel, flood management requirements are stipulated by NCC.
- Both HWC and NCC prefer to avoid the enclosing of the channel, however, are willing to assess any such proposal on merit.
- Any approval to enclose the channel would require detailed modelling which confirms:
 - No loss of flood storage.
 - o Sufficient conveyance paths maintained.
 - No affectation to upstream, downstream or adjacent properties.
 - o New development buildings to achieve 500mm freeboard.
 - Detailed modelling (2D Tuflow or similar) of range of storms (5%, 1% 0.5% AEP and PMF) to be included and reported plus confirmation of no effect in 1% AEP.

Whilst it is noted that flooding is a prominent environmental issue for the site, it is considered that flood issues can be overcome through the implementation of appropriate engineered solutions and mitigation measures. Furthermore, the strategic benefit of delivering a unified site would greatly benefit the future success of the site as the new Kotara Town Centre.

3.0 EXISTING STRATEGIC PLANNING CONTEXT

The following key documents make up the existing strategic planning framework applicable to the subject site, and the manner in which a future redevelopment of the site under a mixed-use, transit-oriented development scheme (such as the Kotara TOD Concept) would achieve and exceed the directions of the strategic framework.

3.1 Hunter Regional Plan (HRP) 2036

The existing HRP identifies Kotara as a Strategic Centre (refer to **Figure 5: Existing Hunter Regional Plan 2036**below) and a regionally significant centre and employment land cluster. Under the HRP, Strategic Centres are envisioned as locations for the concentration of both population growth and economic growth that are facilitated by integrated transportation planning and high-quality urban design.

Specifically in relation to Kotara, the HRP identifies the following priorities:

Centres & Employment

- Continue to provide regionally significant retail, and support growth and diversification of other employment and economic activities.
- Investigate opportunities for medium- to high-density housing within (as shop top housing)
 or close to the centre, in areas not constrained by flooding.
- o Enhance public transport access to other strategic centres in Greater Newcastle.

Housing

- o Investigate new renewal opportunities.
- o Investigate and prioritise additional renewal corridors for longer-term growth that supports public transport improvements, including for the Adamstown-Kotara corridor.



A mixed-use transit oriented revitalisation of the Kotara Home Centre site will support these priorities by:

- Revitalising an employment and commercial centre to provide more efficient use of land and greater commercial floor area.
- Address projected population growth by facilitating higher density residential outcomes with access to well-planned and high quality public recreation areas within the existing urban footprint.
- Facilitate the improvement of the public transport network by locating metro nodes within close proximity to residential and commercial population clusters.

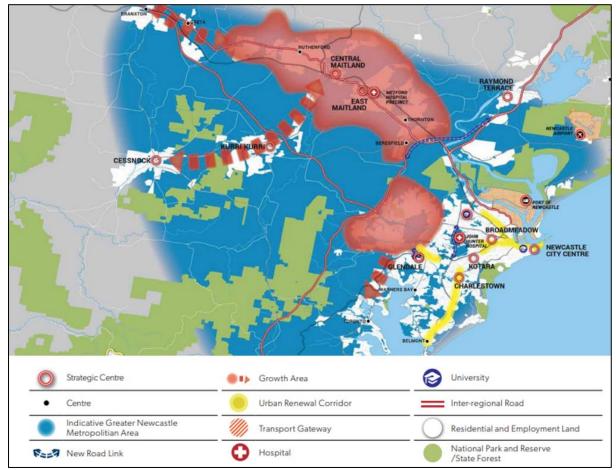


Figure 5: Existing Hunter Regional Plan 2036

3.2 Greater Newcastle Metropolitan Plan (GNMP) 2036

The GNMP identifies the site as a 'catalyst area' for the New Town Centre of Kotara as indicated by **Figure 6** below. The desired role for Kotara within Greater Newcastle is to act as a 'diverse employment centre with mixed-use and high density residential connected to frequent public transport services'.

To implement the vision of the ..., Newcastle City Council will seek opportunities to align local plans to facilitate the transformation of the area to a mixed-use town centre. In addition, Council will work with Transport for NSW for the better integration of transit infrastructure and the broader transport network. In addition, targets have been identified to provide 800 new jobs within the Kotara Catalyst and 400 new dwellings to facilitate forecasted population growth via employment and residential floor area.

A mixed-use, transit-oriented redevelopment of the Kotara Home Centre would achieve a much bolder revitalisation strategy than currently indicated under the The Kotara TOD Concept Plan demonstrates this, as it has been designed to:

- Relocate of the Kotara Train Station for better integration with the site and surrounding areas.
- Provide 145,000m² total gross floor area for residential uses (between 800 and 1000 new dwellings based on an average GFA of 150-200m² per dwelling) by introducing high-density living formats such as shop-top housing and residential flat buildings.
- Provide 122,000m² total commercial gross floor area by making better use of the available land area and reclaiming underutilised areas currently dedicated to at-grade parking and stormwater drainage.
- Rationalise the road network by providing an east to west main street with centralised pedestrian boulevard towards the future train station. In addition, new streets with possible shared zoned will be introduced to provide a network of human-scale shopping streets with high levels of pedestrian safety.
- Revitalise the visual amenity through the provision of public spaces and landscaping to promote passive recreation and a clear sense of place.



Figure 6: Extract of GNMP 2036 - Kotara as a Catalyst Area

3.3 Newcastle Local Strategic Planning Statement (NLSPS)

The NLSPS reflects the identification of Kotara as a Local Centre, Catalyst Area and Strategic Centre and further places the site within a Stage 1 Urban Renewal Corridor as illustrated by **Figure 7**. Kotara is nominated under the Plan as a future area for mixed-use, commercial and retail land uses within close proximity to inter-regional transport links. The NLSPS identifies a key growth driver for Kotara, being transit oriented mixed-use development.

As an example of a future mixed-use, transit-oriented redevelopment of the site, the Kotara TOD Concept Master Plan is aligned with the following key planning priorities under the NLSPS:

- Planning Priority 1 Prioritise active transport in our City.
 The site is located at the junction of significant shared pathway infrastructure. Integration of this infrastructure with the inter-region rail network will further promote active transport.
- Planning Priority 2 Support emerging transport opportunities and public transport improvements with continued integration of land use and transport planning.

The existing Kotara Train Station is under-utilised as it is disconnected from areas more populated and frequented areas. The TOD Concept will provide better integration of the rail network with a population and commerce hub.

- Planning Priority 4 Green our neighbourhoods.
 The TOD Concept prioritises shared recreation and socialisation areas through pocket parks that will be comprise landscaped open space.
- Planning Priority 5 Protect & enhance our bushland, waterways and wetlands.
 The TOD concept seeks the revitalisation of an existing infill site for denser urban populations. This, in turn, will reduce pressure on the development of greenfield sites and associated impacts to bushlands, wetlands and waterways.
- Planning Priority 6 Reduce carbon emissions and resource consumption.
 The TOD Concept will integrate multiple modes of public transport to better promote the uptake of alternative forms of travel. This will reduce reliance on motor vehicles and will thereby reduce associated emissions.
- Planning Priority 8 Plan for growth and change in Catalyst Areas, Strategic Centres and Urban Renewal Corridors.
 - The subject site is nominated as a Strategic Centre and Catalyst Area under the
- Planning Priority 9 Create inclusive streets and spaces in our neighbourhoods and Local Centres.
 The TOD Concept can be delivered in an inclusive manner to ensure equitable outcomes for disadvantaged societal groups.
- Planning Priority 10 Development responds to the desired local character of our communities.
 The TOD Concept will deliver denser living formats in conjunction with greater commercial floor area. This is aligned with the local character envisioned for the area.
- Planning Priority 12 Sustainable, accessible and inclusive housing.
 The site is not constrained by excessive topography and can be delivered to maintain accessibility and inclusive housing options.

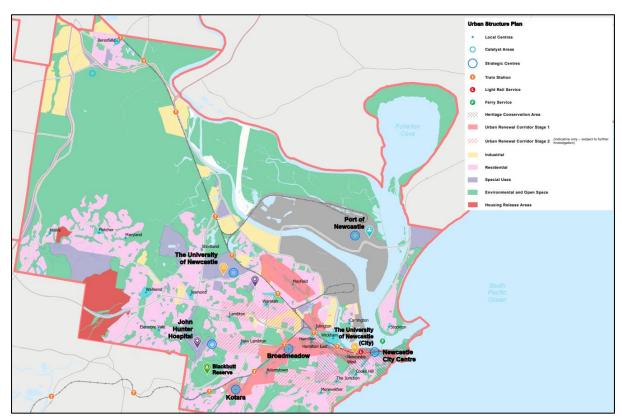


Figure 7: NLSPS Urban Structure Plan

4.0 DRAFT HUNTER REGIONAL PLAN 2041

4.1 Our Understanding of the Draft Hunter Regional Plan 2041

The Draft Hunter Regional Plan (HRP) 2041 sets the 20-year strategic land use framework and continued economic transformation of the Hunter Region. The Plan draws on the concepts of sequenced planning and infrastructure, creating great places, and enriching community character, to manage growth and change for the Hunter in the context of social, economic and environmental matters.

New Strategic Planning Framework

The Draft HRP 2041 elicits an 'infrastructure first and place-based framework' to deliver the Plan's vision and objectives. Currently, strategic land use decisions often precede the provision of infrastructure investment, resulting in unsustainable, inequitable outcomes that are not cost effective. An infrastructure-first, place-based approach to development planning requires infrastructure providers, the development industry and public authorities to take an integrated and coherent place-based approach to land use planning to achieve better outcomes for communities, industry and government.

To assist in the delivery of this new framework, two new strategic planning components:

- The Urban Development Program Committee responsible for the identification of 'Growth Areas' and the sequencing and delivery of infrastructure to facilitate development in these Growth Areas.
- The Place Delivery Group formed by the Department with representation from relevant Councils, agencies and community members to oversee and assist in the preparation and endorsement of Place Strategies for nominated Growth Areas.

Under this new framework, the newly formed 'Urban Delivery Program Committee' (UDPC) will identify 'Growth Areas' through existing and future strategic planning documents. 'Growth areas' include nominated 'Catalyst Areas' under the 2036 such as the new Kotara Town Centre Precinct which comprises the Kotara Home Centre.

After a 'Growth Area' is nominated and prior to the submission of any associated planning proposals or development applications, it is understood that the Department will appoint a Place Delivery Group (PDG) to assist in the preparation of the following documents for the 'Growth Area':

- Place Strategy a Master Plan for a Growth Area which provides a spatial representation of key planning factors for that place.
- Infrastructure Delivery Plan identifies the infrastructure upgrade needs of the proposal and the
 capacity of surrounding infrastructure networks. The infrastructure delivery plan will also nominate
 the expected sequencing and delivery of infrastructure upgrades required by the proposal.

Subsequent planning proposals and development applications relating to a growth area must be prepared in accordance with the applicable place strategy, infrastructure delivery plan and the recommendations of the Place Delivery Group.

Submission Item

- It is requested that the Draft HRP 2041 be amended to clarify the role of the landowner/developer/proponent in the UDPC and PDG processes. In its current iteration, the Draft HRP 2041 seems to indicate that the UDPC and PDG prepare infrastructure sequencing plans and place strategies without input from the proponent who intends to deliver the strategy. It is noted that this will likely cause dissatisfaction with Place Strategy outcomes and may result in delays to the delivery of urban revitalisation.
- It is requested that further information be provided to detail how the new UDPC and PDG framework fits into the overall planning proposal and development application frameworks.
 Specifically:
 - Will the PDG act as a design review panel for urban design matters?

- What type of development professionals and government personnel are expected to sit on the PDG and UDPC?
- Will consultation with the UDPC and PDG be necessitated via the Secretary's Environmental Assessment Requirements process for planning proposals?
- How does a 'Place Strategy' interact with other development control documents such as the Newcastle Development Control Plan 2012 or the Apartment Design Guidelines?

4.2 Kotara within the Context of the Draft Hunter Regional Plan 2041

Inconsistencies with Existing Strategic Planning Documentation

The Draft HRP 2041 is somewhat unclear in its strategic intentions for Kotara. As indicated above, the existing HRP 2036 as well as the GNMP 2036 and the NLSPS all identify Kotara as a 'Strategic Centre', a 'Catalyst Area' and a 'Local Centre'. However, the Draft HRP 2041 is inconsistent in its strategic categorisation of Kotara whereby Kotara is nominated as a 'Catalyst Area' but not a 'Strategic Centre' within the 'Figure 7: Greater Newcastle District' on page 64 of the Plan (refer to **Figure 8** below). Confusingly, Kotara is then nominated as a 'Strategic Centre' within Table 2 of 'Appendix A: Centres' of the Draft HRP 2041.

Submission Item

 It is requested that figures and tables within the Draft Hunter Regional Plan 2041 be updated to accurately reflect existing strategic planning documentation.

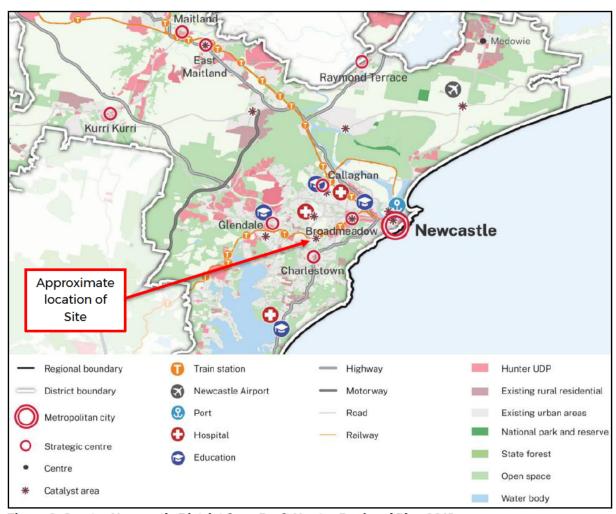


Figure 8: Greater Newcastle District from Draft Hunter Regional Plan 2041

Inclusion of the Kotara Catalyst Area as a District Planning Priority

The Draft HRP 2041 nominates a number of District Planning Priorities for the Greater Newcastle District. These include the following:

- Housing within 30 Minutes of the Williamtown Special Activation Precinct
- Newcastle City Centre
- Maitland's Strategic Centres
- North West Lake Macquarie
- John Hunter Hospital and Innovation District

It is noted that Kotara has been nominated by the Draft HRP 2041 as a Catalyst Area for 'urban activation and employment' which aims to 'focus investment to enable vibrant place outcomes and local jobs'. Furthermore, Kotara is also identified as a 'regionally significant centre and employment land cluster' under the existing HRP 2036. Despite this, the Kotara New Town Centre project is not considered a 'District Planning Priority' under the Draft HRP 2041.

It is considered that the visions for revitalisation and growth relating to the Kotara Catalyst Area in strategic planning documentation to date have fallen short of the redevelopment opportunity and potential presented by the locality and specifically by the Kotara Home Centre site. Existing growth forecasts for 800 jobs and 400 dwellings grossly underestimates the capacity of the Kotara Home Centre site for higher residential and commercial densities. As an example of the site's strategic potential, the Kotara TOD Concept Master Plan demonstrates that the site can suitably accommodate approximately 145,000m² (approximately 800-1,000 dwellings) of additional residential floor area and 122,000m² of commercial area whilst improving access to public transport, maintaining residential amenity in high density formats and providing additional employment opportunity for future residents within a walkable catchment.

The strategic benefits of the Kotara Home Centre site are numerous. The Site is strategically located with an interface to the Main Northern Rail line and at the junction of inter-regional road infrastructure. There is an abundance of existing commercial services within the vicinity of the site that are capable of supporting higher residential population densities. Furthermore, the provision of mixed-use commercial and residential land uses will enable future residents to live and work within a small catchment area, thereby limiting excessive emissions relating to daily travel.

A more intensive mixed-use, transit-oriented revitalisation of the Kotara Home Centre would broadly remain aligned with the strategic intentions of the Draft HRP 2014. To demonstrate this, elements of Kotara TOD Concept Plan have been compared to relevant strategic objectives of the Draft HRP 2041 below:

Objective 3 - Create a 15 minute region made up of mixed, multi-modal, inclusive and vibrant local communities.

- Greater local access to most everyday needs:
 - The mixed-use format of the Kotara TOD enables future residents to live, work and socialise within a walkable catchment. Future commercial premises within the site will be supported by nearby retail uses within the Westfields Kotara site and will benefit from a localised catchment of up to 1,000 new dwellings.
 - The provision of higher residential densities within mixed use building formats and a walkable catchment area will promote commercial development for the purpose of small scale food services and retail premises,
- 30 Minute connected communities
 - o The Site is located with an interface to the Main Northern Railway which can be leveraged to create a more effective and economic inter-regional travel node through the relocation and/or consolidation of the Kotara and Adamstown train stations.
 - The site is located along existing shared pathway infrastructure that can facilitate alternative forms of inter-city travel.

- The site is located in close proximity to commercial and employment land uses, education establishments, residential areas and recreational land uses thereby promoting local, walkable transport rather than car-focused inter-regional travel.
- The Kotara TOD Concept indicates an integrated network of pedestrian and shared pathway infrastructure within the context of public places, pocket parks and landscaped areas for socialisation and recreation.
- The Kotara TOD Concept favours the promotion of alternative forms of travel such as walking, cycling and public transport.

Objective 4 - Plan for "Nimble Neighbourhoods", diverse housing and sequenced development.

- Optimum Density
 - The Kotara TOD Concept promotes a modal shift towards public transport by providing high density development within close proximity to rail infrastructure. The proposal will achieve between 800 and 1,000 new dwellings across an area of approximately 11.8 ha which exceeds the optimal range of 50-75 dwellings per hectare.
 - o The TOD is previously developed land and will likely result in regenerative benefits for the site and wider area
- Regional Household Benchmarks
 - The Kotara TOD Concept comprises infill mixed use development that will provide housing within the existing urban footprint of Greater Newcastle. As such, the proposal will reduce impacts to remnant vegetation and biodiversity and will decrease travel related carbon emissions and will thereby put downward pressure on the per-capita carbon footprint of Greater Newcastle.
- Housing for Tourism, Agriculture, and an Aging Population
 - Future mixed-use residential development within the proposed Kotara TOD may comprise seniors housing or affordable housing options as provided by the State Environmental Planning Policy (Housing) 2021.

Objective 5 - increase green infrastructure and quality public spaces and improve the natural environment.

- Public Space & Urban Greening
 - The site is within a walkable catchment to public open space and bushland within Blackbutt Reserve, Kullaiba Reserve and Hudson Park. In addition, the Kotara TOD Concept involves the integration of communal open space and public green areas to facilitate passive socialisation and recreation.
 - Public green spaces and recreation areas are located with accessibility via the public pedestrian and cycling shared path network.
- Biodiversity Values
 - The subject site is entirely built out with no remnant biodiversity values. The revitalisation of the site in accordance with the Kotara TOD Concept is therefore unlikely to adversely impact local biodiversity values.
 - The subject site is located in an existing infill area. Housing in this location will thereby put downward pressure on the demand for new greenfield housing.
- Waterways & Drinking Water Catchments
 - o The Kotara TOD Concept can be designed to ensure water quality and quantity targets are met and improved prior to discharging run-off into public systems.

Objective 6 - Reach net zero and increase resilience and sustainable infrastructure.

- Community Resilience to Natural Hazards
 - The subject site is mapped under Newcastle City Council's Flood Planning Tool as within a Very Low to Medium Flood Risk Area. The proposed redevelopment of the site under the Kotara TOD Concepts provides an opportunity to alleviate flood risk by installing suitable detention and retention measure into future stormwater infrastructure.
- Air Quality & Transport Emissions
 - The Kotara TOD Concept will minimise air pollutants through the promotion of public transport and alternative transport networks through increase accessibility and a highly walkable commercial catchment.



 The Kotara TOD Concept has been designed to locate public green spaces away from busy road frontages to minimise future residents' interactions with airborne pollutants.

Objective 7 - Plan for businesses and services at the heart of healthy, prosperous and innovative communities.

- Centres & Main Streets
 - The Site's location with an interface to the Main Northern Railway and the inter-regional road network, as well as at the junction of the inter-city shared pathway network will facilitate an inclusive and accessible hub of commercial, residential, social, civic and community uses.
 - The Kotara TOD Concept provides a main street throughfare that will strengthen the role of centres and main streets in the Hunter's sense of place and identity.
- Night-time Economy
 - The mixed-use format of the Kotara TOD Concept will promote a variety of commercial development and place-making initiatives such as outdoor dining, restaurants, small bars and the like that will support a night-time economy.
- Healthcare & Education Services
 - The subject site is located in close proximity to a variety of schools and childcare institutions. In addition, the site is appropriately zoned to enable future development for the purpose of childcare centres and education facilities.

Submission Item

- It is requested that the Draft Hunter Regional Plan 2041 be amended to include the Kotara New Town Centre Precinct as a 'District Planning Priority' and seek to work in partnership with existing landowners of the Kotara Home Centre to achieve a mixed-use, transit-oriented revitalisation of the site.
- Noting that the general structure and layout of the Kotara Home Centre revitalisation may be subject to change, it is requested that the amended HRP Plan 2041 reflect the following components of the Kotara TOD Concept:
 - Residential density and commercial yield;
 - Anticipated mix of uses;
 - Investigation into the relocation/consolidation of the Kotara and Adamstown Rail Stations;
 - o Height of buildings and scale of urban form; and
 - o Public green spaces.
- Further to the above, it is requested that the Draft HRP 2041 be amended to facilitate the necessary legislative changes to accord with a mixed-use, transit-oriented redevelopment of the site:
 - Future rezoning to support mixed-used comprising commercial, large format retail and shop-top housing outcomes within the site;
 - Implementation of a consistent height of building standard across the site that is compatible with shop top housing as proposed by the TOD Concept Master Plan;
 - o Implementation of a FSR standard that is compatible with the commercial and residential yield proposed by the Kotara TOD Concept Master Plan.

Should you require any further clarification or would like to meet to discuss the opportunities for the revitalisation of the Kotara Home Centre, please do not hesitate to contact

Your sincerely,



ENCL.:

From: DPE PSVC Hunter Mailbox To: Cc: Subject: FW: Submission to the Draft Hunter Regional Plan 2041 Date: Friday, 4 March 2022 4:06:57 PM Attachments: image002.png image003.png image004.png image011.png image012.png Hey Submission on the draft Regional Plan for filing Cheers Dan From: Sent: Friday, 4 March 2022 3:59 PM To: Cc: Subject: Submission to the Draft Hunter Regional Plan 2041 Hi Thank you for your time on the phone earlier today. As discussed, please find attached our submission to the Draft Hunter Regional Plan 2041 . This submission centres around the prepared on behalf of Kotara Home Centre and its strategic planning merit for inclusion as a 'District Planning Priority' under the final Hunter Regional Plan 2041. Attached to this email is the following: • Formal Submission Letter to the Draft Hunter Regional Plan 2041; Please give me a call if you have an questions or would like to discuss further. My details are provided below. Kind regards, ?

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sender by return email, do not use or disclose the contents and delete the message and any attachments from your system. Unless specifically stated, his email does not constitute formal advice or commitment by the sender

From:

To:

DPE PSVC Hunter Mailbox

Cc: Subject: 200427 - Pokolbin - Submission Draft HRP 2041

Date: Friday, 4 March 2022 4:11:22 PM

Attachments: <u>image001.png</u>

image002.png image003.png image004.png image005.png

Good afternoon,

Thank you for the opportunity to provide comment on the Hunter Regional Plan 2041. We look forward to seeing the final document once it becomes available.

Regards,



Comments on the Draft Hunter Regional Plan to 2041

Thank you for sending a hard copy of the document. It multiplies efficiency in responding.

For people whose working and living conditions are inundated, I request we all get an *extension* to today's end date for this submission. * In any case, climate/floods may prompt revision of content.

The submission below adds to my brief notes entered into the Comments fields, on line, before.

page 17, Government bodies administering change:

.. includes **NSW Health**. This department has been responsible for the demolition of hospitals all over the region. Pork barrels have contained smaller boxes with fewer beds, sending more cases to 'centralised' hospitals in big cities. We saw the violent and enforced demolition of a fine heritage hospital, needed by the arts community in Murrurundi, in the middle of a pandemic. Losing 18 beds, leaving 8 in the new adjacent box. This I hear, is typical. In Bega, the community managed to win over Government, saving the building for use.

So: overhaul NSW Health on this: The next 20 years, NO hospital closures or demolitions. Listen to community, get your "committees" from true community representation, not by appointment.

Re the desirability of "growth", and its "sustainability" I refer NSW to the work of Prof. Ted Trainer.

He would have supported the ** **15 minute concept**, as do I. Life lived at human scale; compact, minimising costly wasteful travel, eat locally grown food, make things locally, all this is **good.**

But growth, that's questionable. It comes at the expense of everything it touches. Planning/design in Australia is so far behind world standard that our growth is stupid, and eats up every life asset we are given. We can't even make a solar desalinator instead of shipping plastic water bottles to Fiji.

The DPIE should be named "Environment, Heritage, Planning and Industry." Our **"environment**" comprises all matter, all forces, all content involved in our lives. Please don't see it as something out there beyond; pretty but dispensable, innocuous, to be escaped, ignored, trashed, box-ticked.

Technology must involve cradle-to-grave recycling; must minimise waste, toxins, cruelty. Or ditch it.

Population; restrict its growth urgently. Nice to have kids, but only replacement numbers; if your own kids are to survive. The replacement should generously include refugees and immigrants.

Now in the Hunter, **new housing design** is tacky and wasteful, not worth the extreme prices asked. Housing is for profit; not for people; and not for protection of life and comfort. The idea that the market reigns is a fond pretence that people will buy what's good. They won't. Providing good design is not a communist plot, really it isn't. Not doing so is laziness, and a sad lack in legislation.

LAWS should ensure that Architects and educated designers plan housing, not builders or anyone.

Climate; well yes.. it's too late. But every decision can slow this catastrophe.. or not.

The latest "COAL FACE" reminds us Stephen Galilee (greed) still grips our weak governments tightly.

We are failing to alert governments to the fact that **we can't eat money..** that organisms depend on air, water, food and habitat to merely survive, before starting to enjoy anything else.

- * LAWS should keep fossil mining from killing the biosphere. Expel foreign fossil miners, to start.
- * LAWS right now could stop mines poaching good builders and tradies, even school students, from **needed and safe jobs in Hunter community**. Workers are induced to waste the training they've received, leave colleagues, move families. They leave a Regional Skills Shortage in their wake.

THIS IS NEVER RECOGNISED in Government pronouncements. No info is demanded from mines.

Just the huge proportion of mine truckies who left good jobs, is enough to debunk this:

"Objective 1.. diversify mining.. (!)": "Government will work to support coal-dependent communities to diversify for the future. this will ensure communities remain vibrant places to live with good employment opportunities." Sorry but this goes along with Galilee's push to convince these workers that they are indeed dependent on coal. They lap it up. So does DPIE?

Fact is, this is the second transition. The first, long and gradual at first, was TO coal. Lately, it's a rush. So many coal drivers still have their old training, skills, colleagues, clean and healthy jobs, to return to. They have large houses they can sell and downsize back to their old communities which have sorely missed their skills. Here in town we all know many service workers 'gone to the mines'.

The Government does not mention the cause of the "regional skills shortage". Why? Maybe you don't even ask Mines where they get their workers.. who are generally not sitting round previously untrained, with nothing to do. Stephen sure won't encourage your curiosity either!

* Government's ability to believe it can continue this way, and still cut emissions, is strange.

page 23, I agree with backing the green energy transition.

I agree; preparation of mining personnel for other technical opportunities is necessary and good.

I agree that Government should be helping Councils in recycling and value adding.

** In fact, Veena Sahajwallah should be given the overview of this whole sector.

page 24, an exaggeration: "mining underpins **Hunter prosperity**, a significant source of direct and indirect jobs". (as said, mine expansions poach from, and weaken the existing economies.) The exaggeration has become a mantra, an empty assumption. too widely believed. Dangerous +++

The Australia Institute has long established that public subsidies to coal reduce its **revenues** to an *uneconomic* level, especially using the triple bottom line. DPIE ignores this? Government does.

I agree with trying for **biodiversity corridors**, but it's written as a last priority after the "jobs thing" which, however much a furphy, is used as a weapon to extend destructive mining.

Rehabilitation.. I agree with that too. Who wouldn't? But it is a minor window dressing, fronting an empty, devastated shop. And it will be the first thing to be dropped. Even now, the gigantic result of the proposed Mt Pleasant Mine expansion would be "rehabilitated" from 2048 to 2053, if at all. Meanwhile, only the rising slopes facing the nearby town are being hurriedly dressed now. The

result is too steep for stock, not suited for crops, and blocks all the distant views. So the list on page 80 may be a general furphy, at least in this example. Rehabilitation can't make a purse from an ear.

Villages.. "landuses will complement amenity .. eg villages.." Sorry, villages and farm-houses are being demolished even before mines have approval. Mt Pleasant is doing this now. Forget heritage. As to amenity, it's no joke that Mt Pleasant Mine heap would block all the TV and radio reception to Muswellbrook town from the Rossgole national broadcasting towers. Nor that DPIE knows about this, so do the governing party MP's, and yet the application still goes ahead. Is the Mine after more public subsidies to "ameliorate impacts" we wonder? Just to save Indonesia's profits? STOP THIS!!

page 27, I agree and thoroughly respect **the rights of aboriginal people** in the district. Mines seem to use them however, for pork barrel, box ticking and condescension, publicity. Yet these people hold the key to survival, in their understanding of country. Their elders should be in on every plan.

page 41, **map**, the vast pale green spaces are unindentified in the key. This goes for other maps too. Digital maps are more vague than the old paper ones; and the keys are hard to use. What's more, anything can be omitted for effect, like railways, or names of towns (Lochinvar).

The labels on this **map key** are not immediately clear. Eg: 'gateway', 'zoned'... our complete understanding of these is assumed. If comments are wanted from general public, needs full clarity.

If the future of **new housing provisions** depends on the initiatives of private developers, unskilled in planning and design, it's a bad future. Greenfields will be needed for food. Consumption must drop.

NSW Transport: There are no railways on these two maps. People, not just coal on railways, please. **Housing needs transport**. *Currently, there is reduced rail service up the Hunter*. The major morning train to Muswellbrook is gone. * Bring it back, we need more trains. No covid excuses now!

*Transport NSW should be strongly involved in planning new housing areas. So should the specialists in habitat, conservation and national parks, for full integration. Rail and bus should serve and link all centres, which should be compact. This is essential for tourism. Wasteful car travel must diminish. We can do better with car-pooling, public transport, bikes.

RMS: The absence of understanding about roads east from Scone is striking! Scone too is a Barrington entry. It is a crossroads on an existing way from the sea to the inland! Neglected, yes!

RMS: there should be **parallel alternative routes for detours as necessary**, **all along all highways**. Disasters make it obvious why, but so does the need to accommodate non-fast transport.

Habitat, regional connectivity measures. The stated respect for biodiversity offsetting: yes, agree. Up here in the Hunter, I tried to find out who'd bought Scone Mountain. Rumour, BHP Mt Arthur Mine. But no news, publicity, evidence of care, nobody in Scone knew who the owner was. There's just closed gates and nothing. Does that constitute one of the vaunted "private land incentives" then, or are they a new and convenient term for use by politicians seeking a conservative vote? Worry.

page 50, **Net Zero. Resilience. Sustainability**. ESD is 'ecologically sustainable development' isn't it, not economically sustainable.. The language used; it softens for more coal/gas, and it skates over definite ideas for human survival. Much of the introduction is clear to us all already.

The words 'may' and 'likely' and 'opportunities' take the place of definite, enlightened, deliberate proposals/restrictions. This is despite the proliferation of good ideas and concrete opportunities in foreign countries, even in our media. That conservative governments will risk the people for the profit of the few, is surprising.

Newcastle: It was NSW's top tourism asset, ready for the exit of coal. Now it is a hole. The railway was closed for exploiters, the magnificent edges and natural assets further destroyed, its regional connection lost. It will never again be Muswellbrook's lungs, its refreshment, its place where the youngsters visit. NSW must face the truth of this. I doubt any action now can undo the damage.

page 76, map, Central Hunter District.

This shows why Muswellbrook needs lungs. The mines are shown fading out across the northern 'border', despite extending half way to Scone. The Upper Hunter map does not show them at all.

Since MACH Energy has offered UHSC money for roads in Aberdeen already, it is certain that the intent is to extend the impact, (if not the waste heap of Mount Pleasant Mine), well into the Upper Hunter Shire, crashing through the one major E-W ridge which divides the Valley into Upper and Lower. The proposed overburden is already seen easily from Scone, above that ridge. With the (proposed) added height, this is the mine which would block Muswellbrook's TV/radio reception.

This map does not show mines proposed and existing, beyond 'borders' to the west.

The vast sterilized mine pits etc are hard and costly to turn into 'landuses'. Future 'infrastructure hubs' whatever they might be, (profusely labelled on the Comments map) are realistically limited to a few mines at most? This actual term, infrastructure hub, is not in the list page 80. The actual site-specific plans for (?) mass waste disposal (offensive industry?), reuse of coal ash, factories, any good uses in fact, will need research, and starting now.

At this point in time, so fast approaching biosphere failure due to carbon contamination of the atmosphere, I feel the Plan wording is too general and preliminary; as if research is being left until later, to be done by the "market", which is by nature uncontrollable and self-serving.

Fig.13, page 78

Post mining landuse map. The combined operational and non-operational land shown, has contracted from outlines I saw in 2020. Non-operational, and omitted, areas on this map may turn over into vast coal mines, open / underground, if applications are approved.

I ask you that they not be recommended for approval.

A rail line should be included on the map; the view from passenger trains is informative.

Viticulture and horses. the dairying has been largely driven out of the Upper Hunter, but wine and horses are still tolerated by the mines. They attract **tourists**. But tourists are not silly; they can see the mess, it changes daily and it's a shocker. No point talking about perfect scenery now.

The best and only panorama of the valley from a roadway is planned for destruction by Mt Pleasant Mine, crashing through the ridge which carries this road, Castlerock Road.

The Barrington Tops is famous for its singular beauty. But as said, the connection with Scone is overlooked and neglected. The road is closed still, I think. Ordinary cars can't make it anyway. I have wanted to visit it for years; closest town is Scone, but can't get there. No way up.

If tourism is a serious survival activity through mining, then the Barrington Tops needs careful work. UHSC needs help to consider road maintenance, a Council shuttle-bus, council-run accommodation, Devil Ark part of it, carefully designed walks and amenity, Goldrush history, Scone heritage, National Park walks (NOT with bike tracks; they may suit Dungog but not here.)

It would be good to remember the nearby **Bicentennial National Trail**; and introduce the idea of horse trails in the Horse Capital! We don't even have a trail for a visiting kid to ride a horse.

Later p 110, it is recognised that **agriculture and scenery need protection**, with buffers against 'development'. Yes. I go further; development should be carefully restricted and planned. Already we have seen approval of sprawl on black soil lands which suited cows better than concrete slabs.

page 108, **Upper Hunter map.** Again the key leaves much of the land area not specifically identified. The map omits all mines, though we see them daily, and huge mines are expanding on the flanks close to the south west as well as south on the 'border'. Necessary map 'borders' are reasonable, but should not exclude important information between adjacent zones.

The non-mine Upper Hunter map looks positive; as if the Government intends not to let Muswellbrook Coal through underground towards Scone, and to leave Upper Hunter alone in general. But we need confirmation of this in light of the threat particularly from MACH Energy. We also need a complete stop to Approving new or extended coal mines. Protect what we still have.

* The jobs thing, to finish with.. it seems to be the main driver:

If there were truly NO other jobs for these workers, then it would be even more shocking to send people down more mines for dead end futures, wasting more lives and training.

But there ARE other jobs; both existing and future; jobs which are healthy and needed. And that's the point. Survival, health and need. That's Government responsibility.

From:
To:

DPE PSVC Hunter Mailbox

Cc:

Subject: Hunter Regional Plan 2041 submission Atkinson

Date: Friday, 4 March 2022 4:12:45 PM

Attachments: NSW Draft Regional Plan Hunter to 2041.docx

To the DPIE,





This email has been checked for viruses by Avast antivirus software. www.avast.com Via email: hunter@planning.nsw.gov.au

RE: DRAFT HUNTER REGIONAL PLAN 2041 – COMMUNITY CONSULTATION

We write in response to the public exhibition of the Draft Hunter Regional Plan 2041 (the Plan) by the Department of Planning, Industry and Environment (DPIE)¹ as concerned researchers and scientists from the disaster and development group at the have decades of experience working variously in the United Nations system and environmental science sector, focusing on sustainable development goals and disaster risk reduction.

From its first page, pride of place in the Plan is given to realisation of several United Nations Sustainable Development Goals (SDGs) that are considered particularly relevant, though only seven of the seventeen have been accorded this privilege. While the SDGs were never intended to be automatically addressed in their entirety on every occasion that they were invoked, the exclusions inevitably speak as much about the ambition of those who reject them as much as they do to the focal issues of adoption. Perhaps more importantly, in this case they signal the scope of planning intent, those matters that are considered "within scope", and those that are not. This decision immediately excludes the majority of the UN SDGs, which notably include good health and well-being (SDG 3), climate action (SDG 13), life below water (SDG14), and life on land (SDG 15)².

From the outset, the plan highlights the need for an integrative approach to regional planning, a key component of which is the consideration, then mitigation, of future extreme events into planning decisions in a way that is consistent with building community and societal resilience. This echoes the global sentiment first articulated by UN Secretary General Ban Ki Moon, who said when introducing the Sendai Framework for Disaster Risk Reduction (SFDRR) in 2015, "Sustainability starts in Sendai", thereby highlighting the reality that failure to reduce disaster risk wherever it is identified inevitably leads to an unsustainable future. Months after the Secretary-General spoke, Australia became a signatory to the Sendai Agreement, thereby committing to managing disaster risk by both reducing existing disaster risks and preventing new ones being created. The National Disaster Risk Reduction Framework (NDRRF), which was prepared by the National Resilience Taskforce in 2018, guides Australia's efforts to meet its obligations under the SFDRR to proactively reduce disaster risk by 2030.

Under these Frameworks, all sectors of society are accountable for reducing disaster risks within their control, with the greatest onus placed on Government given its greater power of influence. As DPIE is accountable for reducing disaster risk associated with land use planning, the Plan is a key mechanism to reduce disaster risk in the region. While the Plan includes some attention to disaster risk reduction it fails, however, to adequately address the disaster risks posed by development, particularly in relation to the drinking water catchments.

¹ N.B. Lack of cons stency in P an nomenc ature regarding department name i.e. P anning and Environment, or P anning, Industry and Environment

² N.B. Infograph c m s-numbers the se ected SDGs for integration.

As noted in the NDRRF, water is an essential service, and failures of the water supply system could result in wide ranging societal impacts, adversely affecting individuals, communities, business, economies and governments. Most definitions of disaster emphasise their scale, noting that they overwhelm local capacity to cope with the consequences of the trigger event. The systemwide failure of the Hunter's water supply could easily overwhelm existing emergency water supply resources, crippling both social and economic activity.

Development in drinking water catchments is one of the key sources of water contamination and is, therefore, a significant hazard to the water supply. Development increases pollutant loads within water sources and changes flow regimes and natural treatment processes; not all of these impacts can be completely mitigated through planning controls. Further, encroachment of development on water sources and storages leads to a range of other hazards, such as unauthorised public access (which can lead to direct contamination of water bodies), rubbish dumping, and increases in bushfires³. The cumulative effects of these hazards reduce the resilience of the system to cope with other stressors, such as natural hazards; this threatens the ability of the water sector's mitigation measures to maintain a safe and consistent supply of potable water.

The National Health and Medical Research Council's Australian Drinking Water Guidelines state that "Prevention of contamination provides greater surety than removal of contaminants by treatment, so the most effective barrier is protection of source waters to the maximum degree practicable", and that "Protection of water sources... are of paramount importance and must never be compromised". The Hunter's water supply system has multiple barriers to managing contamination. While the current system has, to date, protected the community from public health and supply disasters, continual challenges associated with climate change and increasing development in sensitive catchment areas will inevitably increase the risk to the potable supply. The latter hazards can be minimised through appropriate land use planning, including the protection of drinking water catchments.

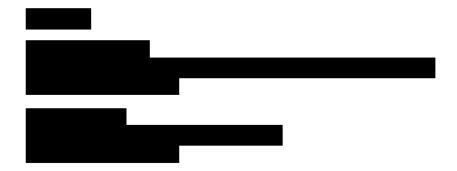
Water is an essential service. Clean drinking water is a fundamental requirement of health and resilience of communities, and an essential need for all of society. The water supply is, however, subject to extreme constraints. Natural potable water sources are scarce and exceptionally vulnerable to changes in climate and environment; as the Plan notes, such changes, and their associated hazards, are increasing. Further, alternative water sources have high supply costs and environmental impacts. In contrast, residential and other forms of development have more flexibility in where they can be placed. While the alternative locations may be less desirable from some perspectives, these limitations must not take precedence over protection of essential potable water supplies. Protection of drinking water sources and storages should be given the highest priority for disaster risk reduction in order to protect society and public health, and the catchments and storages should be protected to the fullest extent possible. This is best achieved through limiting development in these areas.

-

 $^{^3}$ M er et a., 2006, Recreat ona Access to Dr nk ng Water Catchments and Storages in Austra a. CRC for Water Quality and Treatment

The proposed increase in development in Medowie, particularly, will increase disaster risk rather than reduce it. It is recognised that Medowie appears to be a desirable location for increased development density due to its proximity to the Williamtown SAP. It must be understood, however, that Medowie is located adjacent to the main storage reservoir for the lower Hunter Region, which is a very sensitive area. Increasing development in sensitive catchment areas unnecessarily increases the risk of disaster for the community, and poses a threat to the resilience of social and economic systems in the Hunter. Further, the Medowie township is already subject to inundation issues that adversely affect local residents, issues that are likely to increase with increased development density. Medowie is, therefore, considered to be an inappropriate location for increased development. The proposed focus of the Plan on increasing development density in Medowie is, subsequently, considered to be inconsistent with DPIE's obligations under the NDRRF and Sendai Framework.

We recommend that the Plan includes greater protection for land within the drinking water catchment areas in order to reduce disaster risk and increase the resilience of the Hunter community. Further, particularly sensitive locations within drinking water catchments, such as Medowie, should be excluded from classification as target areas for increased development.



From:

To: <u>DPE PSVC Hunter Mailbox</u>

Subject: Submission - Draft Hunter Regional Plan 2041

Date: Friday, 4 March 2022 4:46:31 PM

Attachments:

Hi Hunter Regional Plan Team,

Please find attached our submission relating to the public exhibition of the Draft Hunter Regional Plan. I tried submitting it through the portal, but think there might have been an issue with my browser, so have emailed it instead. If there are any issues with the file, or for submission in this manner, please let me know.



Manager Local and Regional Planning Central Coast & Hunter Region Team



RE: SUBMISSION FOR CONSIDERATION - DRAFT HUNTER REGIONAL PLAN 2041

We refer to our correspondence, dated 31 August 2021 regarding the located in the Singleton Local Government Area (refer **Attachment A**), and more specifically the triangular shaped area covering approximately 200 hectares at McDougalls Hill, bounded by the New England Highway, Rix's Creek Lane, and the Main North Rail Line (**Subject Area** – refer **Attachment B**) submitted in response to DPE's stakeholder engagement prior to the release of the Draft Hunter Regional plan 2041 (**Draft Plan**).

We provide this further submission in response to the public exhibition of the Draft Plan.

The Subject Site is strategically located at the northern end of the proposed Singleton Bypass. It is located within 2km of the Singleton's CBD with existing access to the New England Highway via Rix's Creek Lane (refer **Attachment C**). The defined off ramps on the northern side of the proposed Bypass will provide additional access paths from the site to the Bypass and will link to the existing commercial and light industrial area of McDougalls Hill Business Park via an overpass. There is an existing electrical supply running through and past the site, with water and sewer services available for connection near the intersection of Magpie Street and the New England Highway.

With regard to this submission, and by way of update since the previous correspondence, we have had a further meeting with

to discuss the Subject Area. It was noted at that meeting, that whilst the Subject Area was not explicitly identified in council's current 2041 strategies, consideration of the site for employment purposes was consistent with council's LSPS and particularly actions 4.2.1 – 4.2.3, copied following for ease of reference, which are yet to be completed.

4.2.1. Complete a report, formally reviewing land use zoning around existing and proposed transport and infrastructure corridors, which gives

- consideration to land use compatibility, minimisation of land use conflict and protection of visual amenity.
- 4.2.2. Through planning controls, apply impact buffer areas around existing and proposed transport corridors to protect the ongoing operation of transport infrastructure and minimise impacts from use of such infrastructure.
- 4.2.3. Carry out an analysis of the impacts and opportunities associated with the Singleton New England Highway Bypass route.

Council also intends to commission a report which outlines what quantum need for employment land exists in Singleton, identifies suitable areas around the Singleton by-pass onramps and offramps for employment land, and which makes recommendations on land uses and other controls which would be beneficial to attract those land uses which contribute to economic diversification in Singleton.

In the interim, and to support this submission, Bloomfield commissioned Monteath & Powys to undertake a desktop assessment on the status of land currently zoned B5 Business Development (B5) and IN3 Heavy Industrial (IN3) within the Local Government Area (**LGA**) of Singleton. That assessment revealed that there is minimal employment (business/industrial) zoned land in the right location to service the future needs of the LGA (refer **Attachment D** for copy of report).

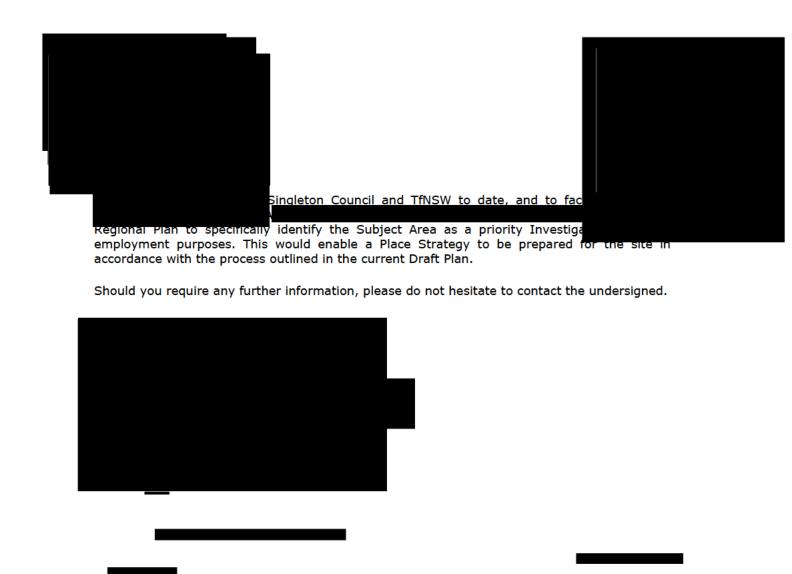
have also been engaging with Traffic for NSW (**TFNSW**) with regard to their acquisition of that part of the Subject Area required for the Singleton Bypass. As part of those discussions, the proposed use of the Subject Area for employment purposes was raised. TfNSW did not raise any concern with that proposal and were generally of the view that the site had strategic merit in that regard. The discussions with TfNSW are ongoing at this point in time.

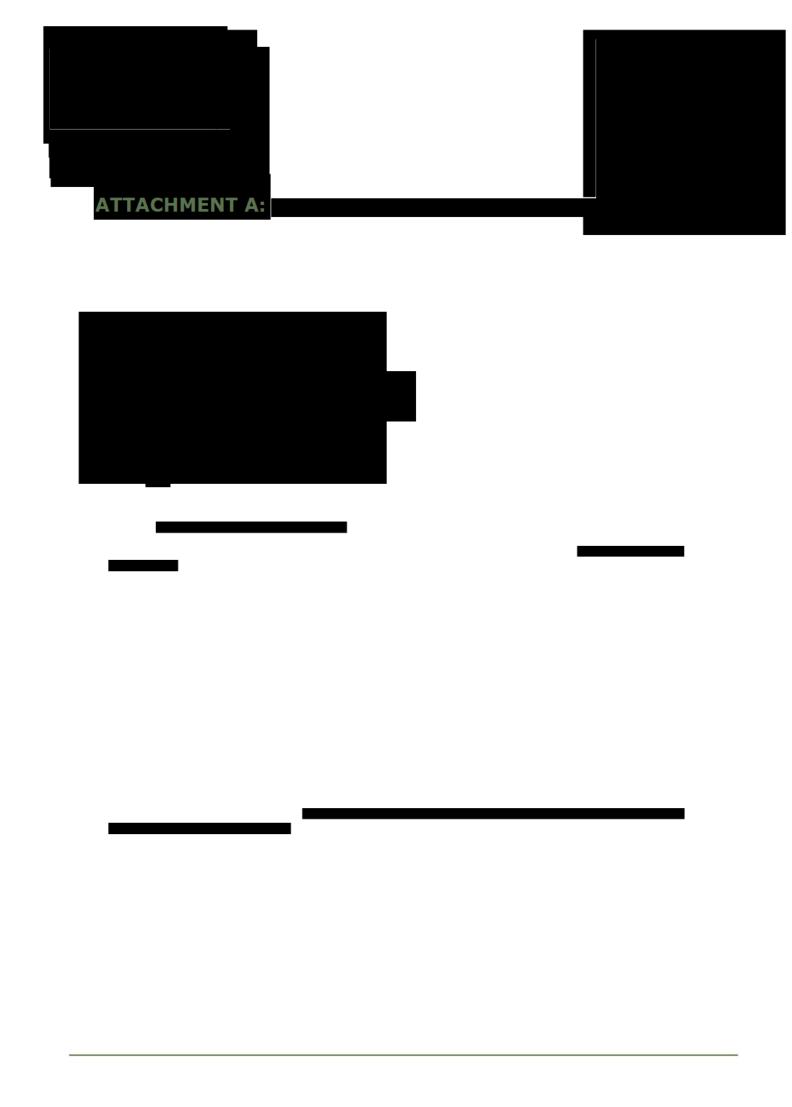
Consistent with our previous correspondence, we propose to continue to engage with Singleton Council as the employment lands needs analysis is progressed and further explore the opportunities for the Subject Area to assist in delivering the economic diversification goals of Council.

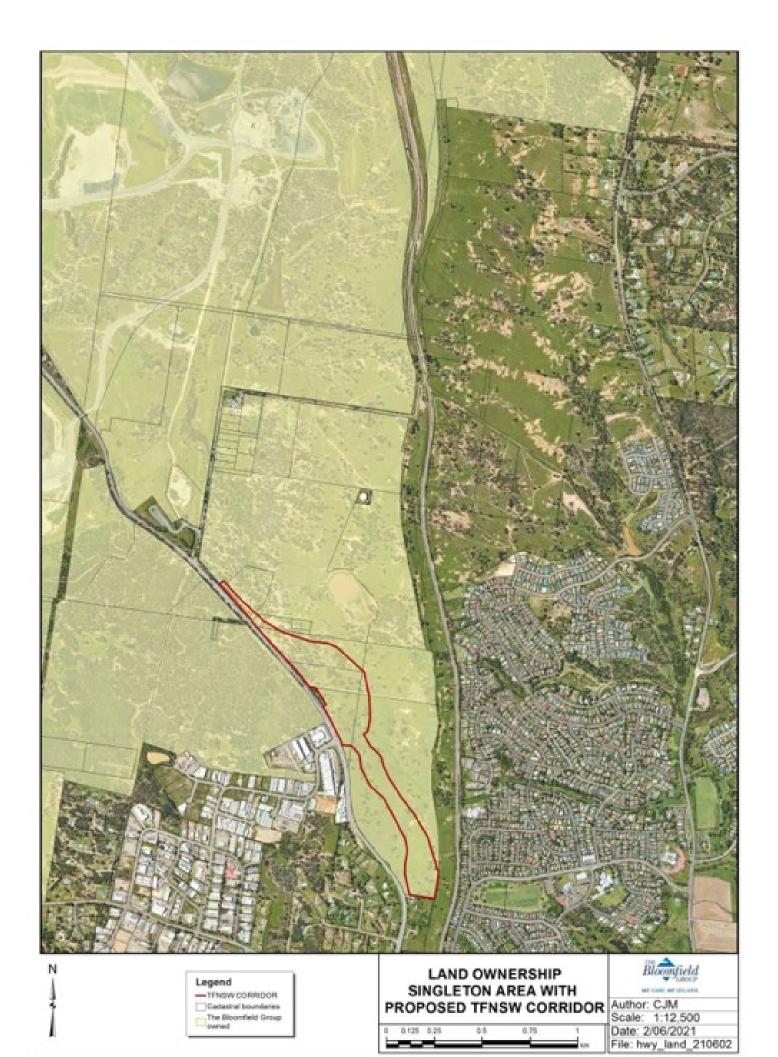
Recommendation

In summary, the Subject Area offers a number of attributes for development as employment land:

- Proximity to existing urban areas
- · Close proximity to Singleton's CBD
- Linkage with an existing commercial and light industrial area
- Easy access to a major road network
- Land suitable for development as employment land being lightly vegetated, low slopes and flood free
- The environment of the site is suitable for employment land being bounded by a rail line and major road
- The site offers further potential development to the north, in the future, as mining transitions from the area.











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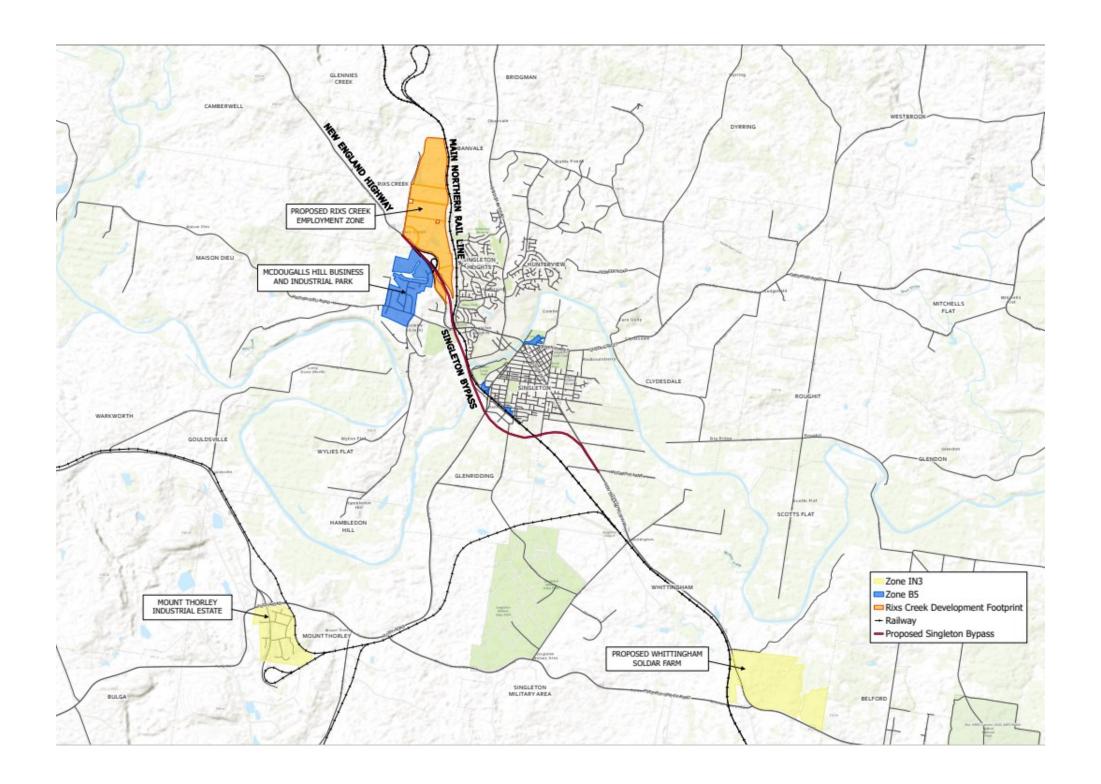
Scale: 1:12,500

Date: 3/06/2021 File: hwy_land_210602a

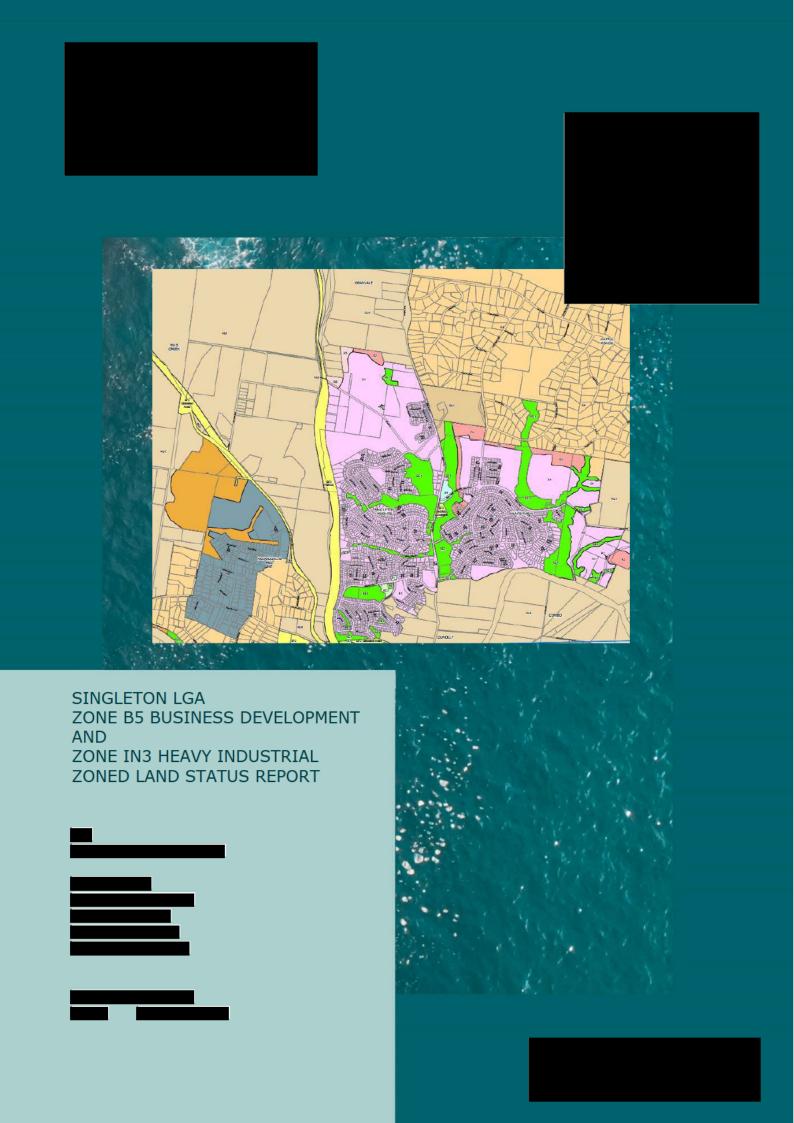
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1. INTRODUCTION

have been engaged by to undertake a desktop assessment on the status of land currently zoned B5 Business Development (**B5**) and IN3 Heavy Industrial (**IN3**) within the Local Government Area (**LGA**) of Singleton.

1.1 Context

is considering future land use options for certain parts of the A current focus of these land use considerations relates to an area of approximately 200 hectares at McDougalls Hill, bounded by the New England Highway, Rix's Creek Lane, and the Main North Rail Line, proposed for employment/industrial purposes as shown in Figure 1. Anecdotally, Singleton LGA has a limited amount of undeveloped/vacant land remaining within existing landholdings zoned for employment/industrial purposes. The availability of sufficient employment/industrial zoned land for future needs of the LGA is a consideration in the planning for the Rix's Creek Mine landholding.

1.2 Purpose

The purpose of this Status Report (**Report**) is to identify the amount of undeveloped and/or vacant employment/industrial zoned land available within the Singleton LGA.

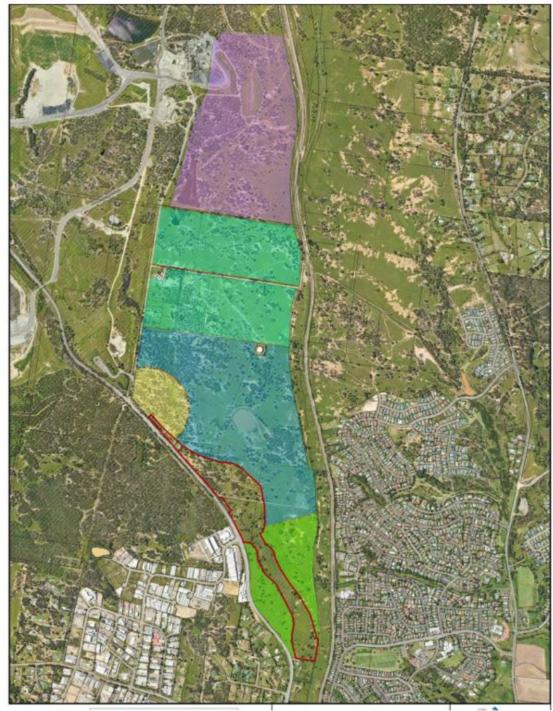


Figure 1 - Potential Employment Land - Mine Land

2. ASSESSMENT METHODOLOGY

2.1 General Assessment Methodology

The following process was implemented to assess the amount of undeveloped/vacant land existing within zones B5 and IN3 of the Singleton LGA:

- Up to date land boundary cadastral data was sourced from the NSW Digital Cadastral Data Base.
- Singleton LGA land zones B5 and IN3 boundaries were sourced from data.gov.au spatial datasets.
- Recent aerial imagery was sourced from MetroMaps by Aerometrex.
- The land boundary cadastral data, zone boundaries and aerial imagery were overlaid, and plans prepared to identify undeveloped and/or vacant land within the respective zones. Refer.
- Each undeveloped/vacant site address was confirmed on the NSW Planning Portal using the Lot and Deposited Plan (DP) details.
- Searches of the Singleton Council Development Application (DA) Tracker were then undertaken (on 17 January 2022) using the title details of each undeveloped and/or vacant site to ascertain if DA's have been lodged or previously determined.
- Searches of the NSW Government Major Projects planning portal were also carried out to identify if any developments are proposed on the undeveloped and/or vacant sites.
- All data including DA Number, Application Type, Date Lodged, Address and Type of Development derived from the DA Tracker were then entered into an Excel Spreadsheet – refer **Appendix A**.

3. ZONES B5 AND IN3 DATA ANALYSIS

3.1 Zone Locations

As identified within the plans located in Appendix A, there are four locations containing B5 zoned land and two locations containing IN3 zoned land within the entire Singleton LGA.

The general location of the four B5 zoned lands are:

- McDougalls Hill located approximately 3km northwest of the Singleton township.
- Civic Avenue, located on the north side of the Singleton township.
- Ryan Avenue, located on the west side of the Singleton township.
- Kelso Street, located on the southwest side of the Singleton township.

The general location of the two IN3 zoned lands are:

- Mount Thorley located approximately 9.2km southwest of the Singleton township.
- Whittingham located approximately 9.5km southeast of the Singleton township.

The following sections provide a brief summary of the development status at each of the above locations.

3.2 McDougalls Hill



Figure 2 - McDougalls Hill - Zone B5

The McDougalls Hill B5 Business Development zoned land comprises approximately 132.7 ha in total, of which 79.9 ha is developed containing 168 lots, and 52.8 ha of undeveloped land (being Lot 3000 in DP 1220756 only).

Developed Lots

Of the 168 developed lots, 40 lots currently remain vacant.

Of the 40 vacant lots remaining, 17 lots currently have DAs for proposed development, leaving 23 lots available for future development.

Undeveloped Lots

Lot 3000 in DP 1220756, being approximately 52.8 ha, remains the only undeveloped lot within the McDougalls Hill B5 Business Development district.

McDougalls Hill Business Park was originally approved to be developed in 6 stages. In 2021 the final sales for the first three stages were completed and after renewed buyer enquiry levels the partners are currently considering the feasibility of commencing stages 4 and 5 on Lot 3000.

3.3 Civic Avenue



Figure 3 - Civic Avenue - Zone B5

The Civic Avenue B5 Business Development zoned land comprises approximately 5 ha in total. The northwest side of Civic Avenue (Lot 100 DP 737187) is owned by Singleton Council. The development on the southeast side of Civic Avenue is owned by Coal Services Pty Limited.

3.4 Ryan Avenue



Figure 4 - Ryan Avenue - Zone B5

The Ryan Avenue B5 Business Development zoned land comprises approximately 2.8 ha in total over 16 lots and is fully developed.

3.5 Kelso Street



Figure 5 - Kelso Street - Zone B5

The Kelso Street B5 Business Development zoned land comprises approximately 1.8 ha in total over 2 lots and is fully developed.

3.6 Mount Thorley

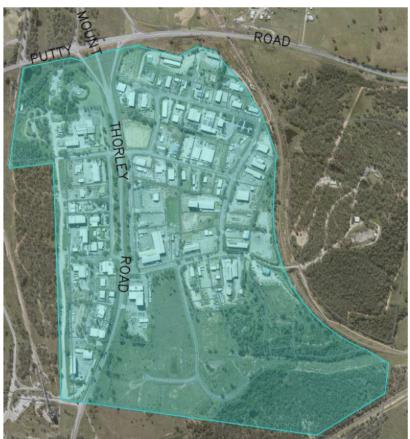


Figure 6 - Mount Thorley - Zone IN3

The Mount Thorley IN3 Heavy Industrial zoned land comprises approximately 143.9 ha in total, of which 120.1 ha is developed containing 89 lots, and 23.7 ha of undeveloped land over 2 lots (being Lot 14 in DP1126226 and Lot 10 in DP 1083504).

Developed Lots

Of the 89 developed lots, 22 lots currently remain vacant.

Of the 22 vacant lots remaining, 6 lots currently have DAs for proposed development, leaving 16 lots available for future industrial use.

Undeveloped Lots

Lot 14 in DP1126226 and Lot 10 in DP 1083504, together being approximately 23.7 ha, remain as undeveloped lots within the Mount Thorley IN3 Heavy Industrial district.

3.7 Whittingham

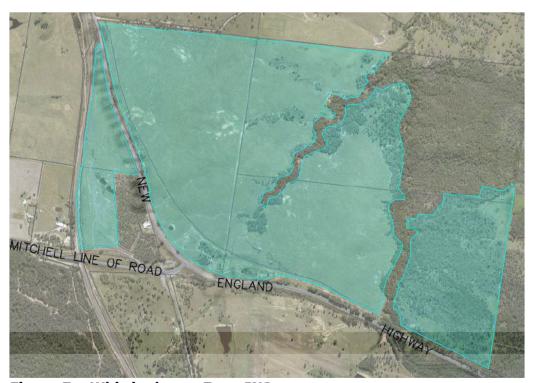


Figure 7 - Whittingham - Zone IN3

The Whittingham IN3 Heavy Industrial zoned land comprises approximately 275 ha in total, with 255 ha on the north-eastern side of the New England Highway and 20 ha to the west.

The 255 ha of IN3 zoned land situated on the north-eastern side of the New England Highway includes 18.4 ha (being Lot 3 and Lot 4 in DP 1248572) that has been purchased by Transport for NSW (TfNSW) for road upgrade purposes. For the purpose of this Report, the 18.4 ha owned by TfNSW is therefore considered developed.

The remaining 236.6 ha situated on the north-eastern side of the New England Highway is proposed to be developed into an approximately 100 MW solar farm with potential energy storage and associated infrastructure. This solar farm development application is being assessed under the NSW Government State Significant Development process (Refer SSD-10453). Based on the NSW Government Major Projects planning portal, the NSW Planning Secretary's Environmental Assessment Requirements (SEARS) for the solar farm were issued in May 2020. For the purpose of this Report, this 236.6 ha of land is also considered to be developed.

With regard to the 20 ha of land on the western side of the New England Highway, the Singleton DA tracker indicates that DA modifications were lodged in 2018. M&P have

contacted Singleton Council to query the DA modifications and await further information to assess the status of this land. For the purpose of this Report, the 20 ha of land is considered undeveloped.

4. SUMMARY OF DESKTOP ASSESSMENT RESULTS

The following tables summarise the approximate total area of B5 Business Development (Table 1) and IN3 Heavy Industrial (Table 2) zoned land within the Singleton LGA and identifies whether the land is developed or undeveloped.

Table 1 - B5 Business Development

Location	Zone	Total Zone Area (ha)	Developed (ha)	Undeveloped (ha)
McDougall Hill	B5	132.7	79.9	52.8
Civic Avenue	B5	5	5	0
Ryan Avenue	B5	2.8	2.8	0
Kelso Street	B5	1.8	1.8	0
	Total	142.3	89.5	52.8

As noted above in Section 3.2, final sales for the first three stages of the McDougalls Hill B5 Business Development district were completed in 2021. Due to renewed buyer enquiry levels the partners are currently considering the feasibility of commencing stages 4 and 5 on Lot 3000.

Based on the analysis contained within this Report, there will be no available zoned B5 Business Development land within the Singleton Council LGA following the development of Lot 3000 at McDougalls Hill.

Table 2 - IN3 Heavy Industrial

Location	Zone	Total Zone Area (ha)	Developed (ha)	Undeveloped (ha)
Mount Thorley	IN3	143.9	120.1	23.7
Whittingham	IN3	275	255	20
	Total	418.9	375.1	43.7

It is considered the Mount Thorley IN3 Heavy Industry zoned district would attract businesses that are likely to focus mainly on servicing the mining sector only.

Table 3 summaries the total number of developed lots within the respective zones, developed lots that remain vacant, and the number of vacant lots that do not currently record any activity on the Singleton Council DA tracker.

Table 3 - Lots within Developed Locations

Location	Zone	Total Number of Lots within Developed Area	Number of Vacant Lots within Developed Area	Number of Vacant Lots without DA's
McDougall Hill	B5	168	40	23
Civic Avenue	B5	2	0	N/A
Ryan Avenue	B5	16	0	N/A
Kelso Street	B5	2	0	N/A
Mount Thorley	IN3	89	22	16
Whittingham	IN3	5	0	N/A
	Total	282	62	39

5. CONCLUSION

There are two main employment precincts servicing the Singleton LGA, being the Mount Thorley Industrial Estate and the McDougalls Hill Business Park.

The Mount Thorley Industrial Estate mainly services the region to the south-west of Singleton, including the mining operations in the vicinity. There is approximately 24ha of undeveloped land remaining within the estate.

The McDougalls Hill Business Park services Singleton and the region, including existing mining operations, to the north and north-west. There is approximately 53ha of undeveloped land remaining within the estate.

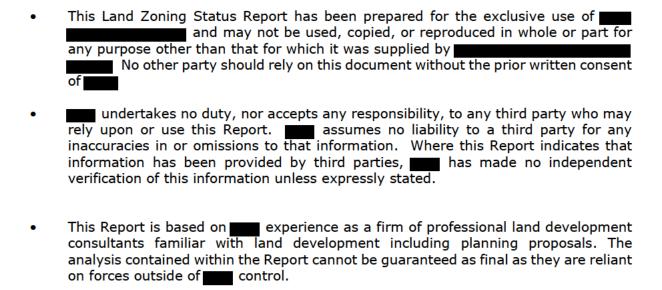
Assuming the 100 MW solar farm currently being assessed via the NSW Government State Significant Development process (SSD-10453) is approved and delivered, there remains extremely limited opportunities for Heavy Industrial development within the Singleton LGA.

The limited supply of undeveloped land in the McDougalls Hill Business Park necessitates the investigation of further land in this area to ensure an adequate supply of employment land is available to meet demand.

6. GENERAL QUALIFICATIONS

- This Report is based on a desktop review of the information referred to within Section 2 above. Areas and the number of lots/vacant lots quoted in Section 3 and Section 4 of this Report are approximate only.
- The vacant land analysis is reliant on the MetroMaps aerial imagery and Singleton Council DA Tracker.
- The number of lots quoted in Section 3 of this Report does not include those that appear to be dedicated drainage reserves.
- References to developed land/lots within this Report generally indicates the land has been subdivided into typical business or industrial sized allotments.
- References to undeveloped land/lots within this Report generally indicates the land
 has not been subdivided into typical business or industrial sized allotments and no
 records exist on the Singleton DA Tracker that indicate future subdivision or
 development is imminent.
- References to a vacant lot within this Report generally indicates a lot within a developed area upon which no building has been constructed.

7. DISCLAIMER AND LIMITATIONS





APPENDIX A - VACANT LOT DA TRACKER SEARCH

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				12 2012.348.1	OC	17/10/2012	Industrial Warehouse
							2 Cockatoo St, Mcdougalls Hill 2330 NSW
30	024405	2 Cookston Street	DE Business Davidanes	15 2012.58.1	Septic Tank	17/10/2012	Pressure Sewer System - OSSM 4306/2012
29	831485	2 Cockatoo Street	B5 Business Development				2 Cockatoo St, Mcdougalls Hill 2330 NSW
1				10 2012.348.1	cc	17/10/2012	Industrial Warehouse
1							2 Cockatoo St, Mcdougalls Hill 2330 NSW
1				8.2012.348.1	DA		Industrial Warehouse
18	1062083	Enterprise Crescent	B5 Business Development	-	-	-	-
40		Maison Dieu Road	B5 Business Development	-	-	-	-
39		Maison Dieu Road	B5 Business Development	-	-	-	-
50		Maison Dieu Road	B5 Business Development	-	-	-	-
59		Maison Dieu Road	B5 Business Development	-	-	-	-
103		Maison Dieu Road	B5 Business Development	-	-	-	-
100	5001		somess percophicite	L	1	L	

Mount Thorley - Vacant Lots Singleton DA Tracker Search

Search Undertaken using Lot/DP details

LOT	DP	ADDRESS	Land Zoning	DA No.	Appn Type	Lodgement Date	Details
54	259572	Woodland Road	IN3 Heavy Industrial	-	-	-	-
1	1126226	Kannar Road	IN3 Heavy Industrial	-	-	-	-
2	1126226	Kannar Road	IN3 Heavy Industrial	-	-	-	-
3	1126226	Kannar Road	IN3 Heavy Industrial	-	-	-	-
4	1126226	O'Hara Place	IN3 Heavy Industrial	-	-	-	-
5	1126226	O'Hara Place	IN3 Heavy Industrial	-	-	-	-
6	1126226	O'Hara Place	IN3 Heavy Industrial	-	-	-	-
							O'Hara PI, Mount Thorley 2330 NSW
7	1126226	Kannar Road	IN3 Heavy Industrial	15 2010.25.1	Septic Tank		DA157/2010 - Warehouse, Workshop & Office
'	1120220	Kalillai Koau	INSTIERVY III CUSTII				O'Hara PI, Mount Thorley 2330 NSW
				8.2010.157.1	DA	7/05/2010	Industrial Warehouse, Workshop & Office
8	1126226	8 O'Hara Place	IN3 Heavy Industrial	-	-	-	-
9	1126226	O'Hara Place	IN3 Heavy Industrial	-	-	-	-
10	1126226	10 Kannar Road	IN3 Heavy Industrial	-	-	-	-
							Kannar Rd, Mount Thorley 2330 NSW
11	1126226	Kannar Road	IN3 Heavy Industrial	8.2011.67.1	DA	15/03/2011	Industrial Shed for Panel Manufacturing Plant
11	1120220	Kalillal Koau	HV3 Heavy Houstrial				Kannar Rd, Mount Thorley 2330 NSW
				15 2011.17.1	Septic Tank	15/03/2011	DA67/2011 - OSSM 4170/2011
12		Kannar Road					Kannar Rd, Mount Thorley 2330 NSW
12	1126226	Kalillal Koau	IN3 Heavy Industrial	8.2011.67.1	DA	15/03/2011	Industrial Shed for Panel Manufacturing Plant
13	1126226	Kannar Road	IN3 Heavy Industrial	-	-	-	-
14	1126226	Kannar Road	IN3 Heavy Industrial	-	-	-	-
138	263809	McMenamin Avenue	IN3 Heavy Industrial	-	-	-	-
139	263809	McMenamin Avenue	IN3 Heavy Industrial	-	-	-	-
135	263809	McMenamin Avenue	IN3 Heavy Industrial	-	-	-	-
136	263809	McMenamin Avenue	IN3 Heavy Industrial	-	-	-	-
137	263809	McMenamin Avenue	IN3 Heavy Industrial	-	-	-	-
							Hedley Rd, Mount Thorley 2330 NSW
				8.2012.61.2	S4.55 Mod		AMENDMENT - Modify Consent Condition 5
							Hedley Rd, Mount Thorley 2330 NSW
				8.2012.61.1	DA	7/03/2012	Earthworks and Consolidation of Lots 61 and 62
							19 Hedley Rd, Mount Thorley 2330 NSW
							Hedley Rd, Mount Thorley 2330 NSW
61	259572	Hedley Road	IN3 Heavy Industrial	8.2007.487.1	DA	3/10/2007	Stormwater Pipes relocation and easements created

			1			1	
							21 Woodland Rd, Mount Thorley 2330 NSW
							Hedley Rd, Mount Thorley 2330 NSW
				8.2003.396.2	S4.55 Mod	27/02/2007	Amendment to Subdivision
							21 Woodland Rd, Mount Thorley 2330 NSW
							Hedley Rd, Mount Thorley 2330 NSW
				8.2003.396.1	DA	12/06/2003	Consolidation of Three (3) Lots into One (1)
				5.1996.145.1	DA	23/10/1996	Piercefield Rd, Mount Thorley 2330 NSW
68	259572	68 Piercefield Road	IN3 Heavy Industrial				Piercefield Rd, Mount Thorley 2330 NSW
				6.1996.480.1	BA	23/10/1996	ERECT MACHINERY SHED, WORKSHOP AND AMENITIES BUILDING
							3 Piercefield Rd, Mount Thorley 2330 NSW
				10 2015.67.1	CC	21/08/2019	Earthworks, site clearing and retaining wall
							3 Piercefield Rd, Mount Thorley 2330 NSW
21	21 255730 21 Piercefield Road	21 Piercefield Poad	IN2 Hoavy Industrial	8.2015.67.1	DA	29/04/2015	Torrens Subdivision 1 Lots into 3 and Construct 4 Industrial Sheds
21		ZI Pierceneiu Kodu	IN3 Heavy Industrial				3 Piercefield Rd, Mount Thorley 2330 NSW
				15 2015.17.1	Septic Tank	29/04/2015	DA67/2015 - Industrial Shed (Proposed Lot 3)
						3 Piercefield Rd, Mount Thorley 2330 NSW	
				15 2015.15.1	Septic Tank	29/04/2015	DA67/2015 - Industrial Shed (Proposed Lot 1)

Whittingham - Vacant Lots Singleton DA Tracker Search

Search Undertaken using Lot/DP details

LOT	DP	ADDRESS	Land Zoning	DA No.	Appn Type	Lodgement Date	Details
	-			5711101	търп туре		Mitchell Line Of Rd, Whittingham 2330 NSW
							New England Hwy, Whittingham 2330 NSW
				8.2016.246.2	S4.55 Mod		Modifiation to Condition 1.5
							Mitchell Line Of Rd, Whittingham 2330 NSW
24	1128978	1 New England Highway	IN3 Heavy Industrial				New England Hwy, Whittingham 2330 NSW
		0 0 ,		8.2016.246.1	DA	12/12/2016	Clearling of Native Vegetation
							Mitchell Line Of Rd, Whittingham 2330 NSW
							New England Hwy, Whittingham 2330 NSW
				8.2010.343.1	DA	28/09/2010	Subdivide into 24 & Access Road
							Mitchell Line Of Rd, Whittingham 2330 NSW
							New England Hwy, Whittingham 2330 NSW
				8.2016.246.2	S4.55 Mod	24/08/2018	Modifiation to Condition 1.5
							Mitchell Line Of Rd, Whittingham 2330 NSW
23	1128978	1 New England Highway	IN3 Heavy Industrial				New England Hwy, Whittingham 2330 NSW
				8.2016.246.1	DA	12/12/2016	Clearling of Native Vegetation
							Mitchell Line Of Rd, Whittingham 2330 NSW
							New England Hwy, Whittingham 2330 NSW
				8.2010.343.1	DA	28/09/2010	Subdivide into 24 & Access Road
1	1248572	1 New England Highway	IN3 Heavy Industrial	-	-	-	-
2		1 New England Highway	IN3 Heavy Industrial	-	-	-	
3	1248572	New England Highway	IN3 Heavy Industrial	-	-	-	-
4	1248572	New England Highway	IN3 Heavy Industrial	-	-	-	-
							Mitchell Line Of Rd, Whittingham 2330 NSW
							New England Hwy, Whittingham 2330 NSW
				8.2016.246.2	S4.55 Mod		Modifiation to Condition 1.5
							Mitchell Line Of Rd, Whittingham 2330 NSW
							New England Hwy, Whittingham 2330 NSW
1	33992	1 New England Highway	IN3 Heavy Industrial	8.2016.246.1	DA		Clearling of Native Vegetation
							New England Hwy, Whittingham 2330 NSW
				8.2009.391.1	DA		Subdivison - 3 Lots into 385 Lots
							New England Hwy, Whittingham 2330 NSW
					DA		Subdivison 3 lots into 3 lots
				45 2009.2.1	DCP amends	18/09/2009	New England Hwy, Whittingham 2330 NSW

From:
To:
DPE PSVC Hunter Mailbox
Cc:
Subject:
Date:
Friday, 4 March 2022 4:50:43 PM
Attachments:

Good afternoon,

Thank you for the opportunity to provide a submission in relation to the Hunter Regional Plan 2041 – refer attached.

We look forward to further engagement with the Department in due course.

Regards,





4 March 2022

Manager Local and Regional Planning Central Coast & Hunter Region Team Department of Planning Industry & Environment PO Box 1226 NEWCASTLE NSW 2300

Email:

ATTENTION:

RE: SUBMISSION FOR CONSIDERATION - DRAFT HUNTER REGIONAL PLAN 2041

We refer to our correspondence, dated 2 September 2021 regarding the submitted in response to DPE's stakeholder engagement prior to the release of the Draft Hunter Regional plan 2041 (**Draft Plan**) and to the previous submission made in response to the Hunter Expressway Draft Strategy (refer Attachment F) dated 12 February 2021

We now provide this further submission in response to the public exhibition of the Draft Plan.

DRAFT PLAN

The is a large 3,600 hectare area, well located in the Lower Hunter to service the continuing and evolving needs of Maitland and Cessnock LGA's as well as the expanding needs of metropolitan Newcastle.

We are pleased that the significance of the has been recognised in the Draft Plan by the inclusion of the area identified as the Four Mile Creek Precinct within the 'National Pinch Point Growth Area' as shown on page 74 (refer to extract at Figure 1 and **Attachment A** for full page) and briefly discussed on page 75 (refer **Attachment B**).

With respect to the National Pinch Point Growth Area, the Draft Plan states, in part:

"The National Pinch Point is the convergence of national road and rail routes located between Hexham and Buchanan. The M1 Pacific Highway, Hunter Expressway, New England Highway, Main Northern Rail Line, North Coast Rail Line and the Hunter Valley Coal Chain collectively provide passenger and freight transport connections to Sydney, Brisbane, North western NSW, the Central Coast and the Hunter."

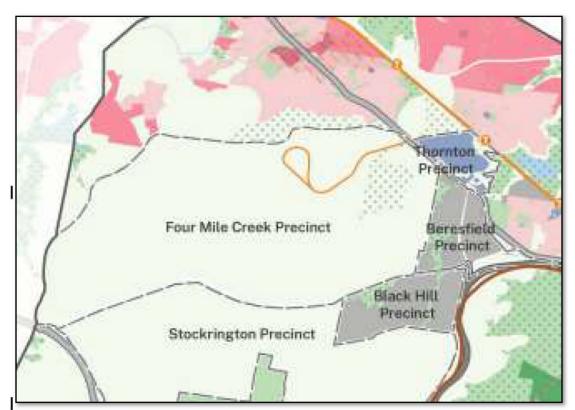


Figure 1 - Extract from page 74 of Draft Plan

With respect to the Four Mile Creek Precinct, the Draft Plan states:

FOUR MILE CREEK

- Encourage employment uses that leverage the access and proximity to M1 Pacific Motorway or rail infrastructure, including freight, warehousing, and logistics, and that complement nearby centres.
- Repurpose existing infrastructure to support transition to new uses.
- Conserve high environmental value land

The Draft Plan also includes the Hunter Expressway Corridor Growth Area (refer **Attachment C)** which includes a number of Interchange Growth Areas. Part of the lies within the Buchanan Interchange Growth Area.





HUNTER EXPRESSWAY CORRIDOR GROWTH AREA

With respect to the Hunter Expressway Corridor Growth Area and the Interchange Growth Areas (refer **Attachment D**) the Draft Plan states:

The prime location of the interchanges on the Expressway are expected to concentrate new development that benefits from the freight network and proximity to growth corridors. Land use and infrastructure should be carefully planned to deliver maximum benefits while protecting the operation of the Expressway and capacity of its interchanges. The Interchange Growth Areas map shows the six areas where careful management of land use change is required

1. Interchange Growth Areas

- Define land available to investigate for release in local strategies, noting that not all areas will be suitable and further detailed assessment will be required.
- Consider other uses compatible with the Hunter Expressway principles and that respond to constraints after detailed planning.
- Prohibit rezoning for residential or rural residential development, other than land in a current proposal or future endorsed local strategy.

2. Planning for employment

- Focus new housing to nearby existing towns and centres to ensure the interchanges are primarily used for employment land uses.
- Consider opportunities for the development of intermodal terminals, freight and logistics that require efficient supply chains, access to customers, land availability and access to main roads.
- Plan for these elements while not restricting these opportunities in the interchange growth areas to make the best use of existing and future improvements to the road

nge growth of new land releases at the all residential development to locations

DEVELOP PLACE STRATEGIES TO ALIGN DEVELOPMENT AND INFRASTRUCTURE

nent of Place Strategies for regionally ows (refer extract **Attachment E**):

councils to prepare place strategies for areas that will address the aspirations tion. Place strategies will enable quality community infrastructure investments. considerations around design, re-use of

consultation, place strategies will consider biodiversity, flooding and other relevant planning matters usually considered through each rezoning proposal, enabling a more holistic analysis of the issues across the place strategy area.'





For growth areas where new greenfield residential subdivisions are proposed, place strategies can help to:

- Facilitate a range of housing types and lot sizes.
- Enable higher yields close to open space, retail, commercial, community, recreation facilities and public transport.
- Provide for an effective and efficient road hierarchy and network; and
- Ensure development is staged to provide access to community facilities and services commensurate with community need.

Changes to Place Strategies

Local strategic planning statements and other local strategies give communities an opportunity to assess the broader implications of proposed changes to urban and employment land. These are the preferred strategic planning approaches to considering changes to place strategies and are agreed between councils and the department before any rezoning can take place. This is a streamlined process for rezoning that considers all state and local planning requirements upfront within a comprehensive regional approach. There may be a need to vary place strategies as new information becomes available or to correct anomalies. In determining the extent of any variation, consideration will be given to the efficient use of infrastructure and services, avoidance of significant environmental constraints and natural resources, and reinforcement of the Hunter Regional Plan strategies and district planning priorities.

* Place strategies will be required for consolidation and expansion growth areas with 2,000 residential dwellings or more, other proposed urban or employment areas of more than 200 ha, or sites held by more than two landowners or across LGA boundaries. Sites under this benchmark are encouraged to prepare a place strategy.

#Future new subdivision means any site yet to receive a gateway determination. It does not apply to existing zoned land, although a place strategy is recommended for sites where it could help to resolve infrastructure requirements prior to the development application for subdivision

Place strategies will be overseen by a place delivery group chaired by the department, and including relevant public authorities, infrastructure providers, LALCs and councils to address agency referral and place-making matters.

The place delivery group will:

- oversee and assist councils with the preparation of place strategies in accordance with sequencing determined by the urban development program committee;
- determine technical investigation requirements and remove subsequent public authority concurrences and referrals at rezoning;
- track the performance of place strategies and escalate to the department's Planning Delivery Unit where there are risks of not meeting objectives of the regional plan;



endorse place strategies to remove subsequent gateway determination when rezoning consistent with the endorsed place strategies; and

g approval pathways. The district and initial steps for the preparation of place s, adding certainty and removing much anned development and investment in side the sequence will have access to fully fund the place strategies. This will ne objectives and district planning as COMMENTS REGARDING THE DRAFT PLAN itional Pinch Point Growth Area and the are welcomed as the Landholding has e attributes and opportunities afforded ses on employment and environmental s are the most logical short – medium lding also presents an opportunity to use outcomes including some areas of ange of land use outcomes include: port routes including the M1, Hunter and Highway, and the main northern ment lands and emerging Black Hill ion to the northern rail line, Inland Rail rail loop, roads, water, and electrical re-use options for employment related the Hunter's economy.

The rail loop provides a unique opportunity to establish large scale freight and logistic operations including distribution centres and the like. The proximity to the airport and seaport, having direct access to the main northern rail line as well as access to the M1



Motorway, Hunter Expressway and Pacific Highway ideally positions the site employment precinct.

he opportunity for some well-planned existing Greenhills and East Maitland future employment that the area will commendations Report notes,

ss regional NSW with rents growing at acancy rates, and relatively high house pility of housing for very low- and low-households. The COVID-19 pandemic, among other events, have highlighted nities and the importance of having an designed, and well-located homes for nic wellbeing."

m part of the solution to many of the

de substantial environmental outcomes legislation and associated framework supply of adequate residential and s that the Stony Pinch landholding has jon outcomes.

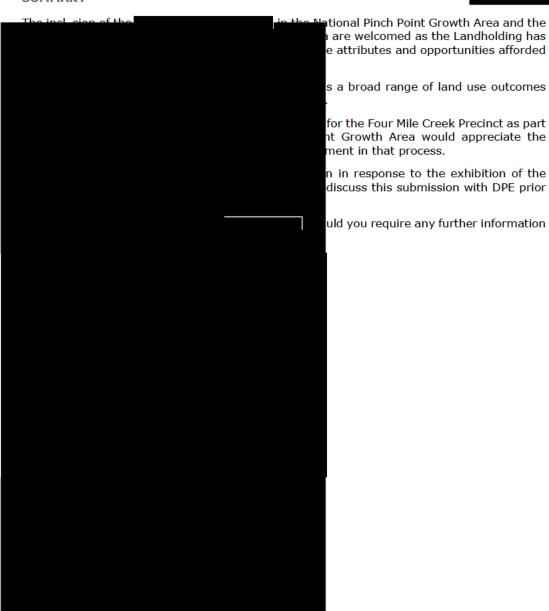
ched indicative draft structure plan has site. This plan was provided to both comment in November 2021. We have so the plan. Maitland City Council were ch Landholding with a strong focus on site provides.

ttempts, we have not yet received any te we have had a positive meeting with rtive of investigating employment and e also held preliminary discussions with

e have undertaken to date, we provide ramework discussed in the Draft Plan, rs have direct representation in the prided for in the Draft Plan and we are out such landowner representation.



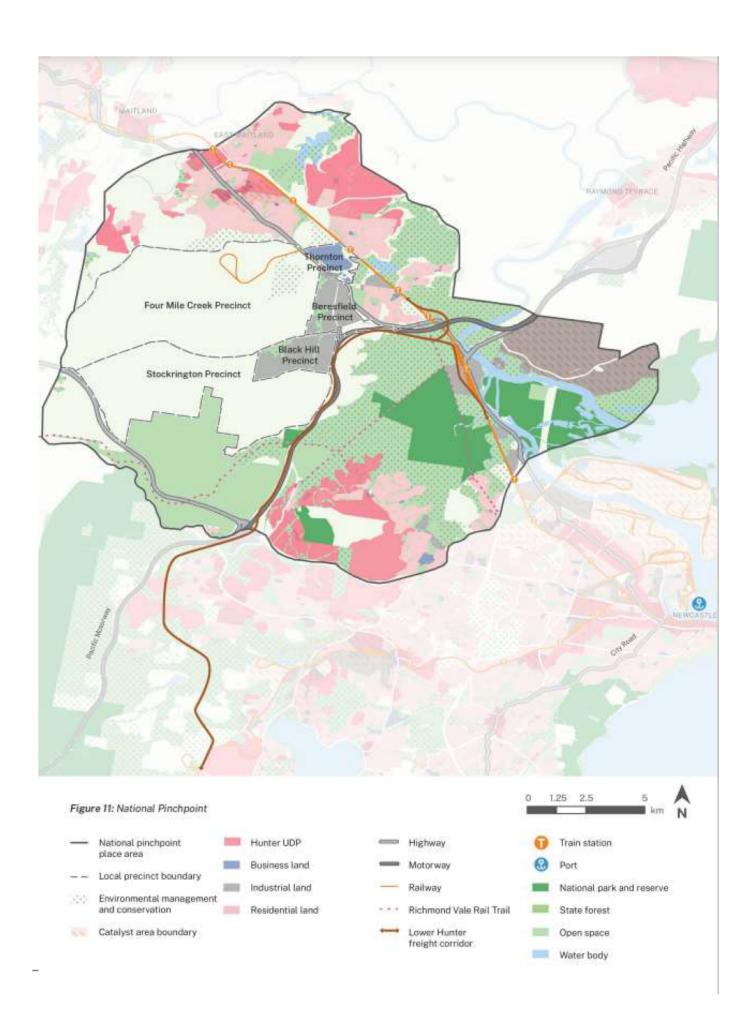
SUMMARY

















National Pinch Point Growth Area

The National Pinch Point is the convergence of national road and rail routes located between Hexham and Buchanan. The M1 Pacific Highway, Hunter Expressway, New England Highway, Main Northern Rail Line, North Coast Rail Line and the Hunter Valley Coal Chain collectively provide passenger and freight transport connections to Sydney, Brisbane, North Western NSW, the Central Coast and the Hunter.

Governments have proposed initiatives to improve the operational efficiency of transport links and connectivity, including the M1 Pacific Motorway Extension to Raymond Terrace and Lower Hunter Freight Corridor.

The Richmond Vale Rail Trail presents one of the most unique opportunities for the region, linking urban areas with a natural break between metropolitan Newcastle and the Central Hunter. Planned upgrades will help to promote walking, cycling, heritage, and biodiversity conversation along its route.

Planning for transport corridors will consider the need to conserve and restore biodiversity, and particularly strengthening habitat connectivity across the Watagans–Stockton corridor. New proposals for employment land will leverage opportunities associated with inter-regional transport connections.

Greenfield areas close to the pinch point have experienced rapid growth over the last decade. Thornton North, Minmi, Hydro and Wallsend will continue to grow and provide housing. Transport infrastructure that enables functioning of regional and state road networks is critical to these areas.

Planned Infrastructure Upgrades

The M1 Pacific Motorway and Pacific Highway are critical links in the National Land Transport Network and among the busiest transport corridors in Australia. The M1 Extension will deliver a 15 km dual carriageway extension of the M1 Pacific Motorway connecting the motorway at Black Hill to the Pacific Highway at Raymond Terrace.

The Lower Hunter Freight Corridor will provide greater separation of freight and passenger movements on the rail network and improve the rail service reliability.



1. Black Hill

- Expand freight and logistics, manufacturing and other light industrial uses.
- Protect the proposed M1 Extension and Lower Hunter Freight corridors.
- Promote rural lifestyles and the growth of rural enterprises.

2. Beresfield

 Expand freight and logistics, manufacturing, and other light industrial uses.

3. Thornton

- Reinforce business and light industrial uses to service the surrounding residential community and to complement services offered at Thornton local centre.
- Create a continuous green corridor linking land south of the rail line through to land north of Raymond Terrace Road.

4. Four Mile Creek

- Encourage employment uses that leverage the access and proximity to M1 Pacific Motorway or rail infrastructure, including freight, warehousing and logistics, and that complement nearby centres.
- Repurpose existing infrastructure to support transition to new uses.
- Conserve high environmental value lands.

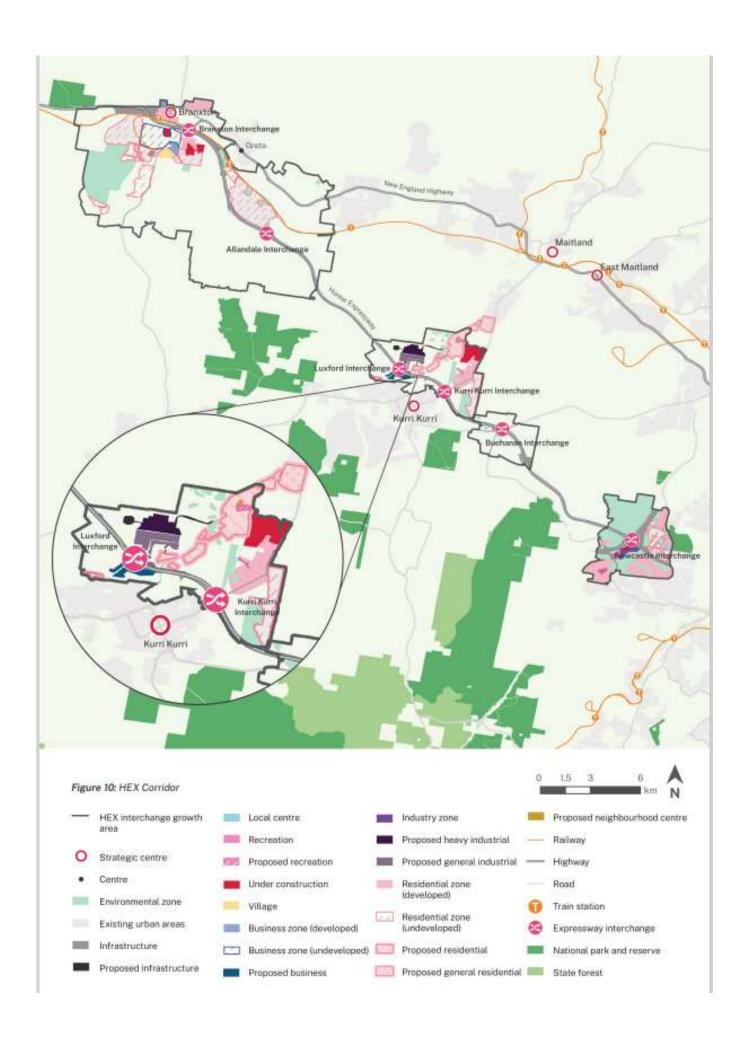
5. Stockrington

- · Conserve high environmental value lands.
- Promote rural lifestyles and the growth of rural enterprises.
- Enable ongoing resource extraction.













ATTACHMENT D: HEX CORRIDOR GROWTH AREA

Hunter Expressway Corridor Growth Area

The prime location of the interchanges on the Expressway are expected to concentrate new development that benefits from the freight network and proximity to growth corridors. Land use and infrastructure should be carefully planned to deliver maximum benefits while protecting the operation of the Expressway and capacity of its interchanges.

The Interchange Growth Areas map shows the six areas where careful management of land use change is required.

Significant land use change is already planned for and underway in Minmi Urban Release Area at the Newcastle interchange, the Hydro planning proposal at Loxford Interchange, Greta Migrant Camp at Allandale interchange, and West Wallsend the Huntlee at the Branxton interchange. As such, there may not be an immediate need to review land uses in the short term for many of the Interchange Growth Areas.

The Kurri Kurri and Loxford Interchanges have the potential to operate as one Interchange Growth Area. These interchanges have unique characteristics and different potential for growth and change in the short, medium and long term.

Land currently zoned for development or subject to a gateway determination will not need to address any additional matters to be consistent with the Hunter Expressway Corridor Growth Area.

Hunter Expressway Principles

- Maximise accessibility through the existing interchanges to maintain connectivity and productivity across Greater Newcastle.
- Protect high value land adjacent to each interchange for industrial and freight and logistics uses.
- Protect the operation of the Hunter Expressway by limiting the encroachment of sensitive residential uses.

As at 2020, the Hunter had 49,000 potential lots in zoned and undeveloped residential land and 1,507 ha undeveloped employment land. There is an additional 6,600 potential lots with a gateway determination to proceed. Undeveloped zoned residential and employment land may face other barriers to development including infrastructure and biodiversity.

Location is also important for many businesses and is understood that some larger areas of zoned employment land elsewhere in the region away from transport corridors may not be well located to respond to the changing nature of employment and freight. However, land near Interchange Growth Areas offer the greatest accessibility.

The accessibility of the Expressway may also attract retail and businesses uses. The development of bulky goods, 'big box' superstores and factory outlet style retailing are to be located outside of the Interchange Growth Areas unless subject to an existing planning proposal.

1. Interchange Growth Areas

- Define land available to investigate for release in local strategies, noting that not all areas will be suitable and further detailed assessment will be required.
- Consider other uses compatible with the Hunter Expressway principles and that respond to constraints after detailed planning.
- Prohibit rezoning for residential or rural residential development, other than land in a current proposal or future endorsed local strategy.

2. Planning for employment

- Focus new housing to nearby existing towns and centres to ensure the interchanges are primarily used for employment land uses.
- Consider opportunities for the development of intermodal terminals, freight and logistics that require efficient supply chains, access to customers, land availability and access to main roads.
- Plan for these elements while not restricting these opportunities in the interchange growth areas to make the best use of existing and future improvements to the road and rail network.
- The NSW Government and councils will manage growth of new land releases at the interchanges by directing residential and rural residential development to locations outside the mapped interchange growth areas.





ATTACHMENT E: PLACE STRATEGIES

Place strategies will be overseen by a place delivery group chaired by the department, and including relevant public authorities, infrastructure providers, LALCs and councils to address agency referral and place-making matters.

The place delivery group will:

- oversee and assist councils with the preparation of place strategies in accordance with sequencing determined by the urban development program committee;
- determine technical investigation requirements and remove subsequent public authority concurrences and referrals at rezoning;
- track the performance of place strategies and escalate to the department's Planning Delivery Unit where there are risks of not meeting objectives of the regional plan;
- endorse place strategies to remove subsequent gateway determination requirements when rezoning consistent with the endorsed place strategies; and
- provide certainty to proponents by confirming approval pathways.

The district and growth area section of this plan proposes the initial steps for the preparation of place strategies.

Place strategies will seek to result in upfront approvals, adding certainty and removing much of the risk for potential investors, while supporting planned development and investment in high quality places.

Proponents or landowners that instigate projects outside the sequence will have access to the same coordinated approach, yet they will need to fully fund the place strategies. This will enable flexibility and agility to continue realising the objectives and district planning as circumstances change.



Draft Hunter Regional Plan 2041 20

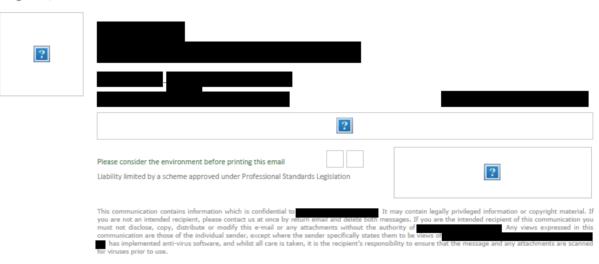
From:
To:
DPE PSVC Hunter Mailbox
Cc:
Subject:
Date:
Friday, 4 March 2022 4:55:16 PM
Attachments:

Good afternoon,

Thank you for the opportunity to provide a submission in relation to the Hunter Regional Plan 2041 – refer attached.

We look forward to further engagement with the Department in due course.

Regards,



DRAFT HUNTER REGIONAL PLAN SUBMISSION

MARCH 2022



Department of Planning, Industry and Environment Draft Hunter Regional Plan 2041 hunter@planning.nsw.gov.au

4 March 2021

Thank you for the opportunity to make a submission on the draft Hunter Regional Plan 2041 (draft Plan).

ABOUT THE

The Committee is an independent and inclusive champion for the people of the Greater Hunter and their enterprises. Representing over 60 organisations including some of the largest employers, institutions and peak bodies in the region, we provide a unified voice for the Hunter. Our members are drawn from the private and community sectors and all three levels of government. We come together with a shared interest in building a sustainable, prosperous and equitable future for our region. The Committee delivers on that promise through advocacy, thought leadership and providing a platform for collaborative action between governments and the region.

The diversification of the Hunter economy is a <u>strategic priority</u> of the Committee.

For more information on the Committee and regional priorities and projects visit

KEY POINTS

More emphasis on strategic planning

The draft Plan is being prepared in accordance with the *Environmental Planning and Assessment Act* 1979. The Act emphasises regional plans as strategic plans setting out a vision, objectives and the strategies and actions for achieving these objectives.

The draft Plan is positioned in the document and functions more as a land use and development plan, amalgamated from council (ten LGAs) Local Strategic Planning Statements and strategies.

This could be balanced with a top-down approach to regional priorities and more focus on the projects, strategies and actions that will achieve these. This will complement and provide direction and certainty to councils and developers to deliver at the district scale.

Establish a more ambitious vision for the Hunter to inform priorities and actions

The vision described in the draft Plan is sound, reflecting triple bottom line principles. However, with the broad focus, it does not distinguish the Hunter and our competitive advantage from any other place.

The biggest disrupter to the region over the next twenty years is Net Zero and the structural decline of coal industries including mining and electricity generation. It also presents the region's biggest opportunity with leadership and a plan.

The diversification of the Hunter economy has to the be question to which everything we do in the region – including the Regional Plan – is a response to.

NSW goals for Net Zero depend on what happens in the Hunter. The region's communities are affected more than most as the world moves to low carbon energy and Net Zero. We also have the most to gain.

Home to the world's largest coal export port, the State must look beyond royalties to productivity for economic growth. It is in NSW's long-term interest to pursue a more diversified economy than services sectors concentrated in the Sydney metro.

We encourage a more ambitious vision and targeted set of objectives to provide more direction to the Plan and accountability for delivery.

The Vision is to *strengthen* and not just maintain the Hunter as the leading regional economy in Australia:

- 1. Triple the number of local jobs occupied by coal mining and electricity generation in a diverse range of industries over the next decade. With over 15,000 workers in these industries, a target of tripling these jobs in ten years (45,000) still only goes part way to delivering the number of jobs required to meet straight line projections in the Hunter Regional Plan 2036. We can aim higher still with a good strategy.
- 2. Position the Hunter as a **global centre and investment destination for Net Zero and clean energy**. Low emissions must be built into the region's development trajectory to remain competitive. There is significant capital to be harnessed, and the region has growing production and services to supply this demand.
- 3. Growth and development to **improve living standards across the Hunter**. This includes housing, jobs, infrastructure and services to support a growing population. The Hunter has the scale and capacity to drive these benefits at the State and national level. The disparity between the socio-economic outcomes of Hunter communities and our Sydney neighbours is not explained by being remote or a lack of resources. With people being the most important resource in the new economy, we need to do better to share the benefits of growth.

Plan for a population of 1 million

The draft Plan has a 20 year time horizon to 2041, while focusing on actions over the next five years until the next review.

While the Vision projects population will be 860,000 by 2041, the draft Plan should explicitly focus on and set up the structures to support a population of 1 million. This will provide more certainty around a plan and investment to manage the challenges of growth and capture the benefits.

Embed quantitative targets for housing

Targets for housing supply will inform priorities, actions and measure progress. The Hunter has entered a housing affordability crisis. It is more important than ever that the Regional Plan identifies housing supply – not just diversity – as a clear priority and provides transparent reporting on delivery.

Identify future major infrastructure needs for further study and gateway processes

A top down approach to regional planning will reveal key corridor and public infrastructure requirements that Government has not yet committed to. As a future-focused strategy, it will be important that the Regional Plan identify these needs to trigger further studies and business cases to move these priorities forward given the long lead times for project planning and delivery.

Identifying these future needs in the Hunter Regional Plan should be understood as a commitment to good process rather than a project.

Focus on delivery

The draft Plan is to be commended for listening to stakeholders and focusing on delivery through the 'Infrastructure first and place-based framework' (Part 1). This aligns with Committee advocacy for Place-based Infrastructure Compact approaches to be adopted in the region. It will be important for further consultation on the model to ensure it facilitates and does not slow down the right

development in the right place at the right time through additional governance, process and gateways.

There is a current backlog of development stuck in the planning pipeline. Addressing this requires focus and funding now while we work collaboratively towards a more normative process of integrated planning, delivery and resourcing.

Synchronise the objectives, priorities, content and release of the Hunter Regional Plan and Hunter Regional Transport Plan

Best practice integrated land use, transport and infrastructure planning is a priority in the Committee's strategic plan.

Land use and transport planning has not been sufficiently joined up in the Hunter. Over \$20 billion in housing and commercial developments are held up by transport infrastructure delays across the Hunter. Those developments could deliver more than 40,000 homes and \$37 billion in economic benefits to the region.

There is an opportunity for better integration with the concurrent drafting of the regional and transport plans. The draft Plan sets out outcomes for housing, accessibility and equity that rely on actions and investments in the transport portfolio.

The draft Plan therefore will need to inform priorities and projects in the Hunter Transport Plan, and vice versa. We are looking for more markers of this feedback and optimisation across the plans in the drafting process and output.

The exhibition period for the draft Plan will close before the draft Hunter Transport Plan is released for public comment. The final plans should be released at the same time and demonstrate clear evidence of integration of land use and transport planning and priorities.

15-minute region

The draft Plan sets out as aspiration for a 15-minute region where people can access most of the things they need without a personal vehicle.

The challenge for the Hunter is not travel time – indeed most residents would state they already live in a 10 or 15-minute region. The priority is to provide more transit options, in particular public transport, to reduce car dependency.

This need is recognised in the draft Plan, however the Strategies in Chapter 3 focus on development solutions. These will not be effective in addressing the problem. The draft Plan raises the issue without acknowledging that the NSW Government holds powerful levers to achieve this objective.

We are seeking a significant commitment to improve and increase public transport services in the region through this Plan, as a direct responsibility of the NSW government. This provides an example of how the draft Plan and the Hunter Transport Plan should be heavily interfacing.

An immediate priority is also an assessment and strategy to address the gaps in existing centres impeding the improvement of a 15-minute regional experience, for example education, social services and open space.

A more strategic approach to the adaptive reuse of coal lands, transport corridors, water licences and supply chain functions across the region

The long-term decline of coal industries releases strategically located and serviced land, transport corridors, water licences and supply chain functions across the region. These are incredibly powerful assets to be harnessed for regional development and to achieve the objectives of the draft Plan.

Plans are advancing on sites in the Upper Hunter including Muswellbrook Coal, Liddell and now Eraring in Lake Macquarie.

With a sequence of closures scheduled over the coming years and decades, this is something the region will need to get good at – something the draft Plan recognises.

The scope in the draft Plan should extend to coal-fired power plant sites and assets in addition to mining. It should also include the transport corridors outside of the gates of these sites that link into domestic supply chains and international gateways.

The regional plan should dedicate significant focus to outlining a strategy for the adaptive re-use of coal assets and corridors in additional to land use principles and development approvals.

Greater Cities Commission

In December 2021 the NSW Premier announced the creation of the Greater Cities Commission (GCC), expanding the remit of the Greater Sydney Commission to Newcastle, Central Coast and Wollongong.

Further details on the role, scope and governance of the GCC have not yet been publicly announced.

Upon establishment, the Greater Sydney Commission produced the Greater Sydney Regional Plan: A Metropolis of Three Cities.

We are looking for more guidance on the role and relationship of the GCC in regional planning and important outputs like the draft Plan before it is finalised, along with the Greater Newcastle Metropolitan Plan (five-year review scheduled in 2023).

Fundamentally the objective is alignment of regional, metropolitan and council plans and cadence.

OTHER COMMENTS

- Meet current commitments for timely reporting on land supply, housing and commercial development, and demand (Part 1: Making it happen).
- Strongly support the objective and strategy for economic self-determination for Aboriginal communities and a stronger role in regional planning (Objective 2).
- Include a strategy to increase and improve and the stock of social housing (Objective 4).
- Include a strategy for complimentary land use around international gateways to protect and enhance their function and expansion into the future (Objective 8).
- Include strategies to enhance inter-regional linkages including commitments to reducing travel times and improving services rail on the Newcastle to Sydney corridor in the immediate future (Objective 8).
- Clarify the relationship, hierarchy, governance and delivery of the draft Plan with the Greater Newcastle Metropolitan Strategy (Part 3).
- Include Eraring Power Station as key precinct for economic development (Part 3: Central Lakes).

From:

To:

DPE PSVC Hunter Mailbox

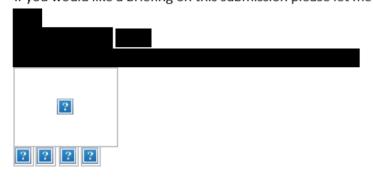
Subject: Committee for the Hunter - draft Plan submission

Date: Friday, 4 March 2022 5:33:36 PM

Attachments:



Thanks for the opportunity to review the draft. The Committee's submission is attached. I could not upload it to the web portal, gave up and am emailing instead. If you would like a briefing on this submission please let me know.





4 March 2022

Hunter Regional Plan Team Department of Planning, Industry and Environment PO Box 1226, NEWCASTLE NSW 2300

Email: hunter@planning.nsw.gov.au

Submission: Draft Hunter Regional Plan 2041

The represents the community on a range of issues which affects the Tomaree Peninsula in Port Stephens LGA, including planning and development, economic development, cultural infrastructure and resources, the built and natural environment, tourism and other grass roots issues.

Introductions (pp 1-14)

The early pages of the draft Plan explain the 'big picture' objectives and intentions, at a higher level than the specific objectives and strategies in Part 2. They also set out the vision and new approach, including how the Plan fits into the wider planning framework. But they also reveal much about the Government's underlying agenda.

Regional Plans are required to be reviewed at least every 5 years.

The Draft Plan adopts the 7 United Nations Sustainable Development Goals, and sets out 4 Hunter Regional Plan Principles - Growth, Community, Resilience and Equity (P9)

While these are all welcome declarations of intent, they can easily be undermined by more specific detail later in the Plan, and by the practical actions and decisions of all levels of government whether directly in implementing the plan; in other changes to the planning system, or in other policy areas.

We are also concerned that there is no separate Principle of environmental protection and ecological sustainability. Incidental references to 'net zero emissions' and to 'weaving nature into our towns and cities' in two of the other Principles are tokenistic and reflect a serious imbalance in objectives and priorities.

Initiatives to date to implement the 2036 plan (released in 2016) include (P10):

- the Greater Newcastle Metropolitan Plan 2036
- a memorandum with the Hunter Joint Organisation of Councils (HJO)
- the Greater Newcastle Urban Development program
- the draft Hunter Expressway Strategy.

Missing from the draft report is critical information on 'how much' growth is being planned for. The best 'clue' lies in the Greater Newcastle Urban Development Program (GNUDP). While there doesn't appear to be a publicly available 'Program' as such, there is an Annual Report on the GNUDP from the Hunter UDP Committee – a grouping of Councils, Government Agency and Development Industry peak bodies, chaired by the unelected Hunter and Central Coast Development Corporation (HCCDC).

The latest published Annual Report (for 2018-19) is dated February 2020, and contains information on housing approvals and completions, discussion of the development 'pipeline' and of future growth priorities and areas.

If this is the latest available indication of what the Hunter Regional Plan is planning for, then it is significantly out of date, not only in relation to development activity in the last 2 years, but also in failing to take account of the effect of the pandemic. International border closures and internal migration patterns are likely to significantly affect demand for housing and employment land well into the future, potentially justifying a major change to the very pro-development emphasis in the current UDP.

The Draft HRP FAQs say that population projections based on 2021 Census will be available early 2022.

Without more specific forecasts and targets for population and employment growth, the overall outcome of the Plan is likely to be identification and potential release and servicing of as much development land as the various constraints allow. While this clearly reflects the objectives of the development industry, and of a longstanding 'growth and development' mindset in all levels of government, we submit that it is not consistent with a genuine commitment to sustainable development, which must start with a community consensus vision of the future of the Hunter Region, including express recognition of its long-term 'carrying capacity'. Without such a quantified vision, the expressed intention to 'Build Back Better' out of the pandemic will be no more than empty words.

An audit of 140 Planning Proposals to amend LEPs in the Hunter between 2016 and 2021 recommended place-based planning that integrates various planning directions. This now appears to be the direction the Government is taking with the Minister's December 2021 Planning Principles, and proposed rationalisation of the multiple State Environmental Planning Polices (SEPPs).

From the diagram on p10, it is unclear what role remains for Local Environmental Plans (LEPs), which are the principal local land-use planning instruments under the EPA Act. The diagram suggests that Place Strategies for specific areas are the next level down from each Council's Local Strategic Planning Statement (LSPS), with Planning proposals that implement Place Strategies being encouraged.

The Department gave assurances in a recent webinar that there is no intention to remove or displace the role of LEPs, but it seems clear that one of the main intentions of all the many current planning reforms is to make new development easier and faster, either by facilitating changes to LEPS (e.g. to zoning) or by facilitating exceptions to the standards they contain (such as height limits). The Plan would benefit from a clearer statement about the continuing role of LEPs.

The Draft Plan sets out 9 'Big ideas' on p11 (which mostly match the list of 8 'key ideas' in the Plan Review FAQs)

What are the big ideas in the new draft regional plan?

- Greater diversification of employment, mining and energy generation lands to support economic renewal and innovation and open opportunities for renewal and change to new land uses.
- A new approach to how we sequence planning for new land uses and infrastructure to accelerate proposals that will support the vision and bring even greater public value.
- New pathways to promote economic selfdetermination and greater recognition and respect of traditional custodians, along with greater connection with Country and integrating Aboriginal cultural knowledge and practice into urban design and planning.
- Establishment of net zero emissions as a guiding principle for all planning decisions.
- A focus on creating a region made up of 15-minute mixed-use neighbourhoods in various contexts, as a response to the new ways people live and work in light

- of the COVID-19 pandemic, including the value people place on local, vibrant neighbourhoods where most needs can be met within a 15-minute walk, bike or drive if you are in a rural area.
- Emphasis on infill approaches to growth over greenfield, the achievement of optimum densities in various contexts to make public transport and neighbourhood mixes successful, and the establishment of flexible land uses in new and existing neighbourhoods to allow communities to evolve over time.
- A renewed focus on green infrastructure, public spaces and nature, by drawing from the opportunities of a rapidly growing region to plan for a better future, using planning decisions to reinforce, enhance and improve quality of tife.
- Prioritisation of walking, cycling and public transport in urban areas, towns and villages across the Hunter.
- Reinforcing the importance of equity so that people have greater choice in where and how they live, how they travel and where and how they work.

We generally welcome 'Big ideas' 3,4,7 & 9.

Idea 2 is potentially unwelcome given its emphasis on 'accelerate' – it will be important to clarify how the proposed 'sequencing' will work in practice (see below).

Ideas 5 & 8 are welcome aspirations but may not be practicable outside urban areas

Idea 6 (the equivalent 'Key idea' in the FAQ uses 'consolidation' in place of 'infill' – same concept). This 'idea' is welcome in principle but there is a risk it will be misused to support unacceptable built form outcomes, such as high rise in coastal towns. Infill is generally preferable to greenfield development for a number of good reasons, but infill

must be sensitive and appropriate for localities, and not 'one size fits all' imposition of higher density through built forms which change local character too much or too fast.

'Our Regional Vision for the Hunter - The leading regional economy in Australia, connected to and caring for Country, with a vibrant metropolitan city and sustainable 15-minute neighbourhoods at its heart.' (p14)



We note that this graphic suggests that at least 9 storey developments are acceptable in strategic centres – we challenge this assumption if it is intentional and applied to all strategic centres – some may accommodate high rise, others not – see our comments on housing supply later in this submission.

Part 1 – Making it happen (pp 15-20) = process

Part 1 of the draft is about how it will be implemented.

'An infrastructure-first and place-based approach will materialise the plan's vision and objectives into outcomes for the community.' (p16)

This is welcome in principle but the timeline graphic does not support the approach – it shows infrastructure *delivery* still coming after development starts

'Better coordination begins with a strong evidence base. Regular monitoring of land supply, dwelling production and demand will enable better decisions on urban renewal priorities, release of land for development and the infrastructure and servicing required to enable delivery.

The urban development program is the NSW Government's program for managing land and housing supply and assisting infrastructure coordination in the Hunter. This program will be expanded to include all of the Hunter, using existing housing monitors as a basis for extension to all parts of the Hunter. '(p17)

See our comments above on the GNUDP. It seems the intention is to revise and expand the current UDP to apply more broadly to the entire Hunter region, and to all forms of development not just housing.

The Hunter Urban Development Program committee is clearly a very significant participant in the proposed new approach, but has an unacceptable structural 'bias' in favour of the development industry. There is no representation of environment or community groups on the Committee, and no obvious representation of environmental interests even from within government agencies (Environment, National Parks, EPA).

It cannot be assumed that Councils represent these interests – some may while others clearly have a growth and development agenda which needs to be balanced by voices unequivocally representing the wider range of values captured by the UN Sustainable Development Goals to which the draft Plan subscribes.

The 'brief' for the Committee outlined in the panel on p17 ('The Committee will ...') makes it clear that the Urban Development Program (driven by the 'lopsided' Committees) is currently all about growth – there is not even lip-service paid in this 'brief' to the other objectives and principles.

This clear bias is of particular concern as it seems Councils will be 'directed' to prepare Place Strategies (and modify LEPs?) so as to implement the targets and goals of the UDP.

The Draft Plan sets out a 6 step process for implementing the Infrastructure first and place-based framework' (p18)

Step 1. Plan for growth areas in the right ways through local strategies (p18)

'Councils' local strategic planning statements and other local strategies are essential to the vision and objectives of the Hunter Regional Plan. They identify the growth areas where future urban development should occur and provide for the detailed place-based planning that requires collaboration between public authorities and infrastructure providers. '

The draft plan appears to elevate the importance of the Council Local Strategic Planning Statements (LSPS) – although it is not clear whether it will be the LSPS or the UDP that is the major instrument for identifying growth areas.

It is also unclear whether and how an area identified as having potential for significant growth could be 'de-listed' if and when either infrastructure or environmental constraints subsequently rule it out in whole or part. A current example is the proposed Kings Hill development north of Raymond Terrace, for which the concept plan has recently been refused by the JRPP (now subject to appeal).

The draft plan appears to elevate the role of Local Aboriginal Land Councils (LALCs) to the same level as Councils. It is unclear if it is intended to grant more autonomy for LALCs to pursue their own development and land-use objectives outside of the framework applying more generally. This could usefully be clarified.

Step 4. Develop place strategies to align development and infrastructure (p19)

The department will support and collaborate with councils to prepare place strategies for regionally significant places and other large growth areas * that will address the aspirations of the community and councils' vision for each location.

Place strategies will enable quality development alongside open space, transport and community infrastructure investments. They allow for early public engagement and early considerations around design, re- use of existing buildings, infrastructure and local assets.

Developed with community consultation, place strategies will consider biodiversity, flooding and other relevant planning matters usually considered through each rezoning proposal, enabling a more holistic analysis of the issues across the place strategy area.'

#Future new subdivision means any site yet to receive a gateway determination. It does not apply to existing zoned land, although a place strategy is recommended for sites where it could help to resolve infrastructure requirements prior to the development application for subdivision.

We note that while no regionally significant growth areas are listed in Pt Stephens, there are two Greater Newcastle Metro Plan 'Catalyst Areas' – Williamtown and Tomago within the LGA (see also Table 3, Appendix C, p 128). We assume that Place Strategies will be required for these two areas, although this may be replaced in the case of Williamtown by the Special Activation Precinct Master Plan to be released later in March 2022.

Employment growth at Williamtown and Tomago clearly has implications for housing supply and demand – see under 'Districts' below.

Place planning is clearly intended to become a very important part of the process. We are concerned that once a Place Strategy has been adopted, compatible developments could effectively be given the green light to go ahead without the all-important assessment and consultation processes that apply to Planning proposals and DAs. This is more than hinted at on p20 'Place strategies seek to result in upfront approvals'. This

^{*} Place strategies will be required for consolidation and expansion growth areas with 2,000 residential dwellings or more, other proposed urban or employment areas of more than 200 ha, or sites held by more than two landowners or across LGA boundaries. Sites under this benchmark are encouraged to prepare a place strategy.

could in effect be an extension of the 'complying development' regime which is already proving problematic.

Also on p20, it is proposed that proponents or landowners could apply for developments 'outside the sequence' (of the 6 steps)). This might be seen to provide for queue-jumping and even for approval of projects which completely depart from the directions set by the Regional Plan, the UDP and any relevant Place Strategy. This would undermine the integrity of the new approach and would be completely unacceptable.

Our other concern about 'Place Strategies is whether they will allow for 'bottom-up' grassroots input. For example, if a local community very strongly supports a specific height limit, and the Council reflects this in a Place Strategy and LEP, will the Department (and UDP Committee) accept that even if it is not entirely consistent with the UDP? Or does the new approach only work from the top down?

The objective of 'front-loading' the planning process to streamline and facilitate later approvals is desirable in principle, but runs into the intractable problem of how to get the community to engage with strategic planning when it is still at a relatively abstract level. Most people will only engage when faced with a specific and imminent change to their environment. While it may be impractical and unreasonable to allow them to veto major projects at a late stage, it is essential that there are meaningful opportunities for input at all stages.

Part 2 - Objectives & Strategies (pp 21-59)

We have selected only some of the content of Part 2 for comment, where it has a particular significance for Port Stephens, or where we consider it important more generally.

OBJECTIVE 1: Diversification and a circular economy (p22)

We strongly support the need for diversification of the Hunter economy and the development of a circular economy which will bring many environmental benefits and contribute to mitigation of climate change.

OBJECTIVE 3: Create a 15 minute region made up of mixed, multi-modal, inclusive and vibrant local communities (p29)

While we strongly support the objective of more self-contained communities that reduce the need to travel, we are concerned that some of the thinking behind this objective is overly focussed on metropolitan and urban areas, and the concepts may not be as easy to implement in smaller towns and rural areas.

We would also be concerned if too many new land uses were permitted in residential areas without an opportunity for public consultation (i.e. any significant extension of the 'complying development' provisions which are already proving problematic). Approval of too many shops and other services within new residential developments could also damage the viability of existing local centres, many of which are struggling with the closure of bank branches and from competition from large out of town retail parks.

A table on p33 shows a range of 'context settings'. We submit that it may be appropriate to add a further sub-category of 'Tourist town/village – examples would include Nelson Bay and Forster-Tuncurry, currently listed along with other 'service centres' in the 'Complete towns/villages' category. Localities with a high dependency on tourism have a range of special considerations including a high proportion of investment properties and holiday accommodation and variable seasonality.

OBJECTIVE 4: Plan for "Nimble Neighbourhoods", diverse housing and sequenced development (p35)

We agree with the Plan's view that 'A greater proportion of diverse and affordable housing will be needed.' We support Strategies 4.2 (small-scale renewal) and 4.3 (community driven innovative housing solutions).

The benchmarks for infill:greenfield development ratios proposed under Strategy 4.4 seem generally appropriate for the broad planning Districts but should not necessarily be applied rigidly at the local level. For example, it will almost certainly be impossible to find suitable greenfield land for 30% of new development in the Tomaree and Tilligerry peninsulas of Port Stephens due to environmental and other constraints. It does not however follow that any shortfall from the benchmark needs to be made up with a greater volume of infill development – the area may simply have a lower capacity for future growth.

We are concerned that the Plan identifies some major new growth areas (Strategy 4.5) while also stating that:

'The identification of potential future growth areas is not a development commitment, nor does it imply that all, or any, part of these areas will be made available for urban development in the future. To remove any doubt, the department will not support premature planning investigation or promotion of

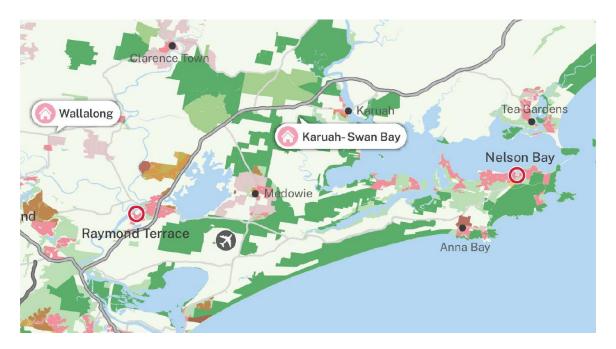
these areas; we will investigate their future role in the next review of the Hunter Regional Plan.' (p39)

The two such areas shown within Port Stephens (see map below). In respect of the Karuah-Swan Bay area, we note that a new Karuah Place Plan has recently been through a round of public consultation, and makes some provision for significant new housing developments, but not including the land shown on the map.

Proposals for development at Wallalong are highly controversial and have been rejected previously due to infrastructure constraints and flood concerns.

The constraints on both areas are acknowledged in the Hinterland District section of the Plan on p100 (where Karuah-Swan Bay is labelled as Swan Bay-Twelve Mile Creek).

Given the increased flood risks due to climate change, it is very doubtful if these areas could ever be considered as suitable sites for major residential development. Identifying them on maps in the Plan as potential future growth area, even with the above caveat, sends the wrong message both to local people fighting to retain the rural character of the area, and to any speculative developers who have gambled on land acquisition.



Extract from Figure 2 Housing page 40



We also note that the proposal for a major residential development (up to 3500 dwellings and associated infrastructure) at Kings Hill north of Raymond Terrace is shown in Figure 2 as 'zoned' (for housing), with an adjacent area subject to Gateway approval. However, the concept plan for the already zoned area has recently been refused by the Joint Regional Planning Panel on 17 separate environmental grounds. Whilst that decision is currently subject to appeal, we submit that the Regional Plan should at least acknowledge that there is a question mark over the contribution this land will make to future housing supply.

We strongly support the need for affordable housing, particularly in eastern Port Stephens for the tourist economy workforce. (Strategy 4.6) There are major tensions between short-term rental holiday accommodation and stock available for permanent residence. It becomes very difficult to plan for future dwelling construction in tourist areas when the planning system currently has little influence over whether a new dwelling is bough by an investor for holiday use or long term rental, or by an owner-occupier.

We strongly support the need to ensure that the increasingly popular Lifestyle villages and communities are located in suitable locations, within easy reach of services by foot, cycle and public transport (Strategy 4.7). Regrettably, several major 'lifestyle communities' have been approved in Port Stephens in the last 15 years in unsuitable locations on rural land, abusing loopholes in planning law relating to 'caravan parks'.

We strongly support Strategy 4.9 to limit dwellings on rural lands that are not a primary residence or associated with agriculture. Too many approvals have been granted in Port Stephens for inappropriate land uses on rural land, including 'lifestyle communities' and major tourist developments that have exploited provision for 'uses permitted with consent' under the LEP, but resulted in wholesale changes that fail to meet the zone objective to retain the rural character of the land.

OBJECTIVE 5: Increase green infrastructure and quality public spaces and improve the natural environment

We strongly support this objective and the proposed Strategies 5.1-5.12, and particularly the emphasis on maintaining and extending green space and tree cover, which has multiple benefits including shade, cooling, habitat and climate change mitigation.

We have one reservation about Strategy 5.8, which is that 'offsetting' for loss of native vegetation or urban tree removal is a largely discredited policy, and needs to be critically reviewed before it is relied on.

In relation to coastal management (Strategy 5.12), we strongly support the need to expedite planning for coastal management, and in particular the need for Councils to take more seriously their approach to developments on low lying coastal land subject to risk of inundation from storm surges and sea level rise.

OBJECTIVE 6: Reach net zero and increase resilience and sustainable infrastructure (p50)

We strongly support this objective and Strategies 6.1-6.6. Councils have been slow to take climate action seriously enough. In order to reduce emissions and to increase resilience to the many manifestations of climate change, significant changes will be needed to 'business as usual' complacency. If the government is genuinely committed to 'Build back better' as we emerge from the COVID 19 pandemic, several of the traditional 'growth and development' assumptions that are still evident in the Draft Plan need to be questioned.

We welcome the Plan's promotion of walking, cycling and public transport and reduction of car dependency (Strategy 6.6) but major modal shifts will require significant behavioural and attitudinal change, and it is important that communities are educated and supported to adapt. This is a much wider task and challenge than can be achieved by land-use planning alone. Attempts to force change by, for example, limiting parking provision could face significant resistance particularly in communities where decades of bad planning have increased car dependency.

OBJECTIVE 7: Plan for businesses and services at the heart of healthy, prosperous and innovative communities (p55)

We support this objective and cautiously welcome the supporting Strategies. However, how the Strategies are implemented in practice, through Place Strategies and changes to LEP standards such as zoning, density and height limits, will be critical to whether they achieve outcomes that are acceptable to local communities.

In relation to Strategy 7.1, we support the general concept of mixed use town centres, and in particular the encouragement of more permanent residents in and close to centres provided that local character and the natural environment are respected. This is especially important in coastal tourist areas. The generally low rise character of the towns and villages in eastern Port Stephens is not only highly valued by local residents, but also a key selling point for the tourist economy. We submit that Forster is a case study of how NOT to provide for growth while respecting local character, and attempts to replicate the Forster-Tuncurry high rise apartment development on the Tomaree and Tillgerry peninsulas are being strongly resisted by the local communities.

We also endorse the importance of protecting existing centres from unfair and unnecessary competition from 'out of town' retail parks, which have been allowed to develop in multiple stages, too often on greenfield sites requiring major habitat destruction. Such retail parks 'lock-in' car dependency and have had a devastating effect on the viability of traditional town and village centres.

Comments on Part 3 from next page ...

Part 3 – Districts (pp 60-119)

The Map on p66 shows the Port Stephens area – which is split between Coastal, Greater Newcastle and Hinterland 'Districts' – see other maps on later pages.



Figure 8: Williamtown regionally significant growth area



Fig 8 Williamtown regionally significant growth area

We generally agree with the division of Port Stephens between these three 'Districts' as different parts of the LGA have very different characteristics and economies. The 'boundaries' are somewhat arbitrary but seem appropriate, provided there is some flexibility in planning around those boundaries.

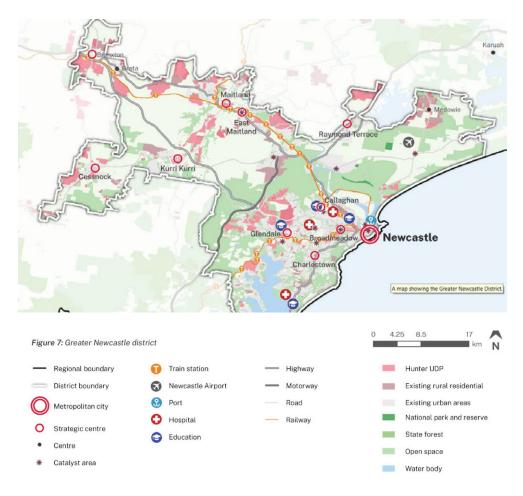
Figure 8 identifies Nelson Bay, Medowie, Fern Bay and Raymond Terrace (+ Newcastle locations) as Priority locations for future housing.

What this means for future land-use (and infrastructure) planning in these locations depends on which of the three 'Districts' they fall into – our relevant comments follow for each of these Districts, on separate pages.

Continued on next page ...

Greater Newcastle District (p63)

Fern Bay, Raymond Terrace and Medowie all fall into the Greater Newcastle District, and are already covered by the Greater Newcastle Metro Plan.



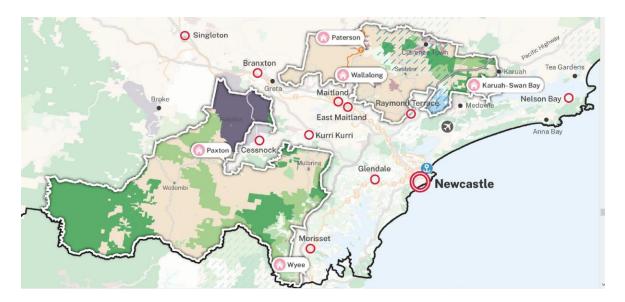
We have already commented earlier in this submission on the Kings Hill proposal north of Raymond Terrace (see under the 'Housing' objective above).

Fern Bay and Medowie are both experiencing rapid growth, and both are subject to recent or current Place-planning by Port Stephens Council (in the case of Fern Bay jointly with Newcastle City Council as the growth area includes north Stockton).

Development in the Williamtown area will be largely determined by the State government's Special Activation Precinct (SAP) process, with a draft Master Plan due to go on public exhibition in March 2022. While we have major concerns about a 'democratic deficit' in this process, with our elected Council being sidelined, we will reserve judgement until we see the draft Masterplan and consultation process.

Hinterland District (bordering Greater Newcastle) (p97)

The map on page 98 shows Karuah-Swan Bay and Wallalong as Potential future growth areas.



We have already commented above (under Objective 4) on the unsuitability of these two areas for listing as 'potential growth areas' and this is supported by the comments on p100 about the infrastructure and environmental constraints.

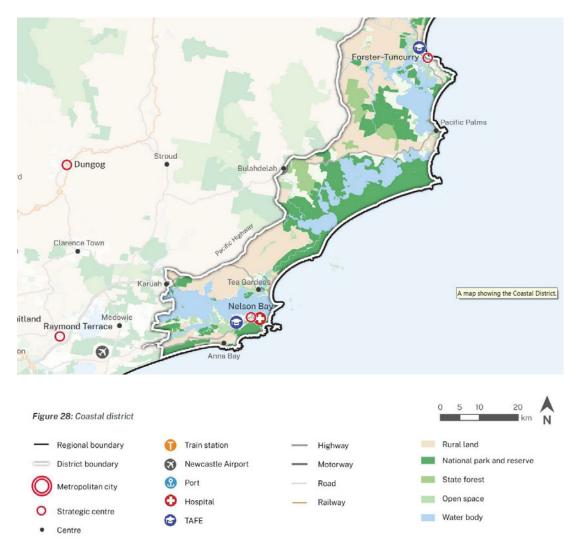
In relation to the other rural areas and villages in the Hinterland District, including Hinton, Seaham and Clarence Town in Port Stephens LGA, the draft Plan says that they:

"... will face increased pressures for residential development due to their scenic rural settings and proximity to Greater Newcastle. Incremental residential growth will be supported where constraints including infrastructure capacity, flooding, bushfire, flood access, infrastructure, important agricultural land and environmental can be managed."

We submit that the emphasis in this statement is misplaced – it should more appropriately acknowledge the multiple constraints and suggest only that some limited incremental growth might be possible and appropriate within those constraints.

This suggested change of emphasis would assist the local communities, and Port Stephens Council, to resist the intense pressure for re-zoning and subdivision in these rural areas.

Coastal District (p115)



Note: The Coastal 'district' extends to the north of Harrington, and takes in Forster-Tuncurry

We have already commented earlier in this submission on specific issues relating to the eastern part of Port Stephens that lies within the 'Coastal' District; i.e. the Tilligerry and Tomaree peninsulas.

Nelson Bay is identified on this Map (Figure 28) only as a 'Strategic Centre', but on the Map on p66 (Figure 8, reproduced earlier) as also a 'Priority area for future housing'.

There has been much confusion over the last 20 years at least as to what the different planning authorities mean by 'Nelson Bay'. The Department of Planning appears to have mostly used it as a synonym for all of the smaller centres on the Tomaree peninsula taken together (including all urban areas from Anna Bay east), although at least one document showed the Salamander Centre as a second 'Strategic Centre' and the major expansion of the retail and industrial park at Taylor's Beach does not fit neatly into either hierarchy.

Port Stephens Council has variously used 'Nelson Bay' to describe just the town centre and foreshore area (as in the Nelson Bay Town Centre and Foreshore Strategy); a wider area including the immediately surrounding suburbs (Nelson Bay West, Corlette, Seabreeze Estate and Little Beach), or in some cases, an even wider area encompassing Salamander Bay and even Shoal Bay.

It is vitally important, for planning purposes, that all relevant authorities (and the community) are on the same page as to the meaning of 'Nelson Bay', and have a shared understanding of any targets for population and employment growth for the different localities on the Tomaree peninsula.

We submit that the Regional Plan should define what it means by Nelson Bay, and where appropriate distinguishes between the different Tomaree localities.

We have no objection to this submission being published in full and unredacted.



To: Subject: Date: Attachments:	DPE PSVC Hunter Mailbox Draft Hunter Regional Plan - submission Friday, 4 March 2022 5:45:13 PM
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Please acknowledge receipt of attached submission by email Thanks	
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From:



HUNTER REGIONAL PLAN 2041

Address:

Proposal: Submission

4 MARCH 2022



Department of Planning, Industry and Environment Hunter Regional Plan Team PO Box 1226 NEWCASTLE NSW 2300

SUBMISSION TO DRAFT HUNTER REGIONAL PLAN 2041

To Whom it May Concern,

This submission is seeking designation of Anna Bay for investigation as a suitable option for future rezoning to contribute to the housing targets identified within the draft Hunter Regional Plan 2041. This submission concerns land located at Nos. 196 Old Main Road, Nos. 263, 271, 293 and 321 Gan Gan Road and Nos. 4495 and 4500 Nelson Bay Road, Anna Bay, NSW 2316 ('the site'). Land adjoining the site is also understood to be under investigation for urban purposes.

Regional plans guide planning and investment decisions by State and local government and the Private sector. The existing Hunter Regional Plan 2036 includes a commitment to establish vibrant and connected communities. The draft Hunter Regional Plan 2041 (the Plan) is a 20 year strategic vision for the region, and will provide directions responding to existing and future community needs for housing, jobs, infrastructure, a healthy environment, connected communities (15 minute cities), zero net emissions and access to green spaces.

The Plan responds to the rapid changes in how people work and live due to COVID and attempts to address the promotion of sustainable growth by connected communities within a resilient 15 minute region, by adopting a place-based approach to establish healthy neighbourhoods, where peoples everyday needs are met close to home within a short walk, bike or bus ride. This will improve the health and wellbeing of both the people and the environment.

The review of the existing Hunter Regional Plan 2036 intends to expand the land captured and reset priorities, including a review of each local council's Local Strategic Planning Statements, so that the revised Plan can build on and provide guidance for their future review.

The site the subject of this submission is located within the Tomaree, which is the most populated planning area within Port Stephens with a population of 26,737 persons in the 2016 Census. Geographically, the Tomaree is located on peninsula split from the Tilligerry peninsula by Tilligerry Creek and is the main urban area of Port Stephens. The economic activity for the area is driven by tourism and focussed around Nelson Bay and Soldiers Point. This commercial activity is driven by tourism consumer-driven activities such as retail and hospitality.

Port Stephens Council, at it's Ordinary Meeting of 8 March 2022 acknowledged that rezoning land in Anna Bay is generally consistent with the visions and goals of the Hunter Regional Plan 2036 (HRP). Subsequently, we contend also conistent with the draft HRP 2041. In order to make efficient use of the land to provide housing choice (including for seniors) with easy access to a range of community facilities and services within a lifestyle village setting, rezonnig in Anna Bay is appropriate. Furthermore, rezoning land not loated within Anna Bay town will support the vision established in the Anna Bay Strategy, for Anna Bay as a small and vibrant town with a mix of retail and office space for local and visitor patronage.

Council state that providing housing for additional residents within proximity of Anna Bay, results in patronage to the commercial uses within the town centre. This is also consistent with the Port Stephens Local Strategic Planning Statement (LSPS), planning priorities 4 and 5 - need for suitable land supply for housing and increase housing choice that suits the needs and lifestyle of current and future residents and consistent with the Live Port Stephens Local Housing Strategy (LHS) which provides locational criteria for additional housing supply in a suitable location with access to various town centres and adequate on site facilities.

The subject site contains a mixture of managed land, existing dwellings and areas of natural bushland. A steep sand dune runs east-west through the site and roughly aligns to the northern extent of the current proposed development. The site will be subject to a future rezoning and further residential development. The land is situated in coastal zone that consists of a variety of landforms including inner and outer Holocene dunes, the low lying, swampy interbarrier depression and Pleistocene dunes.

The land has been subject to previous large scale clearing activities as well as agricultural and pastoral activities, with some residential developments along with the associated infrastructure and utilities. In terms of these land uses and impacts on the landscape and cultural materials these direct impacts to the land and associated cultural materials that may be present are easy to see and understand. The areas fronting Gan Gan Road had been disturbed through previous clearing and construction works associated with residential housing.

The major arterial road, Nelson Bay Road, provides the only access to the area. There are several local bus routes available to residents and tourists to the area that provide connection to destinations such as Raymond Terrace and Newcastle Airport. Of the 7,529 plus lots identified for future land supply in Port Stephens between 2019 and 2040, Tomaree is planned to account for 1,618 lots, or 21.5%.

NSW is facing an extreme housing supply and affordability crisis, with the most expensive housing in Australia and the world, owing principally to the lack of supply of new homes. Over a long period, NSW has failed to build enough homes for the growing population, resulting in higher prices.

The 2021 – 2022 NSW Intergenerational Report recognised the problem and estimated a need for 42,000 homes per year by 2060. This is significant given that construction has not achived this in over twenty years. However, there is encouragement, reflected in the appointment of a Minister for Homes.

Our client is working diligently to assist with the delivery of the required 42,000 per annum, by proposing to provide in the order of 1,000 – 2,000 new adaptable, affordable, lifestyle driven, covid-responsive and eco-friendly dwellings along with a koala santuary (stewardship site) and Aboriginal cultural centre in Anna Bay within the Port Stephens Local Government Area (LGA).

The apartment market is hampered by a lack of consumer confidence and government taxes (foreign investor charges) that is preventing the financing of higher density projects, although Port Stephens Council suggest there is a high demand in their LGA.

Once the Reserve Bank inevitably lifts the cash rates, home buyers will be able to borrow less, constraining how much they can spend and potentially then kerb prices. The forecasts come after home values soared in the pandemic, as locked-down buyers armed with crisis-era interest rates chased more spacious accommodation to work from, and spent significantly longer time periods within the home.

Sydney home values are already high relative to wages, jumping 25.3% in 2021 to a median \$1.098 million on CoreLogic figures that include both houses and apartments while the national median rose 22.1% to almost \$710,000. The jump famously surprised economists, who had expected a deep recession and dwelling price falls of as much as 20%, before stimulus measures and effective social distancing came to the rescue. Notwithstanding this, people are leaving to cities due to lack of affordability, and the new hybrid-work environment established by the pandemic.

NSW has the most expensive charges for the development of greenfield housing and the slowest planning system in Australia. In the short term, the NSW Government needs to focus on restoring consumer confidence and supporting the financing and approval of projects with genuine landholders with shovel-ready proposals.

Infrastructure contributions levels are already too high and have put a significant constraint on supply in NSW for the years ahead. Additionally, several NSW Government departments are ignoring Infrastructure NSW (iNSW) guidance on infrastructure assurance of low risk, low-cost projects and unnecessarily tying projects up in red tape. This is increasing costs to Councils and the NSW Government and delaying the delivery of key enabling infrastructure, holding back the supply of new homes.

In the past 18 months, the greenfield housing market has been delivering at or near its historic supply peak with 13,600 new house sales in the year to October 2021 according to CoreLogic responding both to increased demand fuelled by the Federal Government's Homebuilder initiative and to lifestyle preferences resulting from the pandemic. This has been acutely felt in the regions.

Despite industry efforts, demand has outstripped supply with the price of new homes soaring by 21% in 2021 (much higher in some areas) and rental vacancies plummeting to just 2.6% in Sydney and continuing at below 1% since mid-2020 in the regions, leading to 9% increases in house rental prices.

To reach Net Zero without reducing supply or housing affordability, the building industry and the NSW Government need to work together to develop an achievable roadmap.

To improve affordability and meet the needs of a growing population, this high level of housing supply needs to be maintained over a sustained period. This requires new development ready land (where the planning, infrastructure and biodiversity requirements have been resolved) to re-fill the supply pipeline. Unfortunately, the pipeline is running out.

Without urgent action, the supply of greenfield housing will be insufficient to keep up with demand and affordability will probably further worsen. The crisis in housing affordability can be resolved. The NSW Government has recognised the problem. Now it needs to act!

The Plan includes a new approach to delivery, to support new jobs and housing and its release has come at a critical time with demand outstripping supply, prices are rising. House prices have

increased dramatically over the past year, with some markets in the Hunter experiencing price rises of 50%. Supply must be boosted to avoid even more unaffordable housing in the Hunter.

Unfortunately, many currently zoned greenfield housing sites are burdened with significant enabling infrastructure constraints, and sites that may be considered for future rezoning also face severe challenges. Land needs to be unlocked in the short term and a reliable pipeline of future zoned and serviced land needs to be established.

NSW Government funding and policy support is urgently needed to meet the Hunter's growing housing demand. This Plan proposes new thinking with an expanded role for the Hunter Urban Development Program Committee (UDP Committee) to achieve cross-government coordination to support housing supply and jobs creation.

We welcome the government's acknowledgement that the region needs to focus on achieving development-ready land. The UDP Committee will have an important role in aligning infrastructure where it is needed and positioning priorities for state funding to support growth for jobs and housing.

Although cautiously optimistic, this new thinking will promote better infrastructure investment to keep pace with the accelerating demand for new housing in the Hunter. However, the new planning processes must be backed up with meaningful investments and better planning from government to deliver infrastructure like roads, power, water and sewer.

It is hoped that the Department of Planning will collaborate with genuine invested stakeholders to ensure the final Plan can deliver the housing and jobs needed in the Hunter which has enormous potential. The government planning must support housing growth with investment and direction to give confidence to speculators so that they do not move their interests away from NSW or Australia.

The Plan's strategic directions are outlined for land use decisions that will grow jobs, increase housing supply to suit all lifestyles and needs, build infrastructure (focus on green infrastructure) and public spaces. Economic self-determination is celebrated, along with greater recognition and respect to the traditional owners of Country in the Hunter. Furthermore, rather than dictate actions for councils, the Plan identifies the objectives and principles for council to apply during local strategic planning or when considering development proposals.

The Department intends to collaborate with each local council on the regionally significant places across the Hunter. These places will help to meet the draft plan's vision and objectives in the shortest possible time. We encourage the department to liaise with Port Stephens to finalise the strategic planning work preventing planning proposal's from being acknowledged for legitimate not speculative new housing.

It is acknowledged that the Department will work with council to address district planning priorities, including local planning to sequence planning and investment. Our client has in principle support from the elected Port Stephens Mayor, Ryan Palmer, local community and business support appeals for consideration by the department and local council.

The Plan contains the following new big ideas to support the delivery of the vision:

1. New pathways to promote economic self-determination and greater recognition and respect of traditional custodians, along with greater connection with Country and integrating Aboriginal cultural knowledge and practice into urban design and planning

- 2. A new approach and energy to how we sequence planning for new land uses and infrastructure to accelerate proposals that will support the vision and bring even greater public
- 3. Establishment of net zero emissions as a guiding principle for all planning decisions
- 4. A focus on creating a 15-minute region made up of 15-minute mixed-use neighbourhoods in various contexts, as a response to the new ways people live and work in light of the COVID-19 pandemic, including the value people place on local, vibrant neighbourhoods where most everyday needs can be met within a 15-minute walk, bike ride, public transport trip or drive in rural areas.
- 5. Emphasis on consolidation approaches to growth over expansion, the achievement of optimum densities in various contexts to make public transport and neighbourhood mixes successful, and the establishment of flexible land uses in new and existing neighbourhoods to allow communities to evolve over time
- 6. A renewed focus on green infrastructure, public spaces and nature, by drawing from the opportunities of a rapidly growing region to plan for a better future, and using planning decisions to reinforce, enhance and improve quality of life
- 7. Prioritisation of walking, cycling and public transport in urban towns and village settings across the Central Coast 8. Reinforcing the importance of equity so that people have greater choice in where and how they live, how they travel and where and how they work

Importantly, for our client, the Plan allows for large land holders to seek inclusion of their land in the Plan. Anna Bay has not been earmarked for housing as yet, rather, as a centre near a strategic centre (Nelson Bay).

This submission demonstrates that Anna Bay should be considered a growth area or a mixed use investigation area and include our client's land on Gan Road and Nelson Bay Road (single large landholder of 150 plus hectares - see Figure 1 overpage). Our client is 100% committed to the delivery of quality, affordable, adaptable and diverse housing for the locality.

Given the scale of development, we have invested large funds to prepare detailed technical studies prior which should be endorsed by council including however not limited ecological and aboriginal heritage investigations, bushfire constraints analysis and surveying all the land in order to progress development a masterplan concept.

In order to assist Council, we intend to further investigate the need for a place-based strategy that provides coordination and delivery of planning, infrastructure and government services. It does not rezone land but provides a spatial representation of key planning factors for that place.

This may include areas of high-biodiversity value, key transport links, including cycle paths, areas where development is anticipated and where key supporting infrastructure will be provided to service growth (e.g. schools, sewer, water, roads). A place strategy may include a vision, directions, structure plan and an infrastructure delivery framework.

We encourage the consideration of Anna Bay and more importantly the site as shown in Figure 1 overpage which will provide with government support the delivery of local housing within a few years.

Under the Port Stephens Local Environmental Plan (LEP 2013), this land is spilt zoned R2 and RU2. This could yield in in the order of 2000 plus new homes and contribute to the Port Stephens local strategic vision to provide housing for the seniors of their community to age in place, sea-changers (remote workers) and young families. Once rezoned, lot yields and design will be further considered.

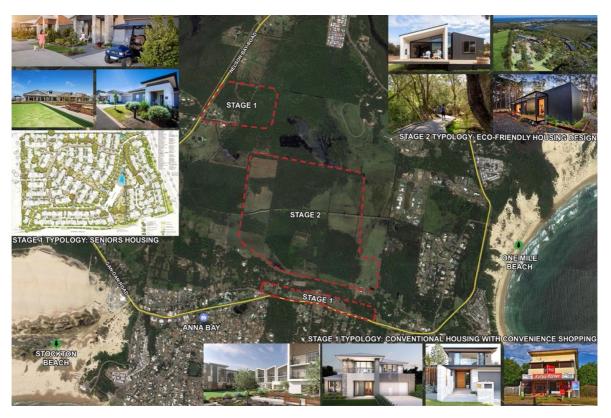


FIGURE 1

The site and proposed delivery of new affordable, adaptable housing on Gan Gan Road, Anna Bay

We have liaised Port Stephens planners who are preparing strategic planning in order to understand the needs of the local government area (LGA) for new housing and delivery of services. This includes the Place Making Strategy (i.e. update to Anna Bay Strategy & Town Plan). Council has commenced development of an Anna Bay Place Plan that is likely to include the entire locality, and is expected to be finalised in the first quarter of 2022.

Place plans start with community values and priorities and identify the unique local character of a place and the ways the community can shape, enhance or protect these aspects. A place plan is guided by strategic documents. It also includes an analysis of potential opportunities for a place in line with the community's vision. Every place is unique and so is every place plan. A place plan may include events and activities, projects and works, actions for community, land use changes and more.

The most important part of a place plan is the activation plan. It includes projects or ideas to create more vibrant places for people to connect, discover and enjoy with their community. The 7 Day Makeovers in Anna Bay and Medowie are examples of amazing community-led initiatives in Port Stephens.

Place plans start with feedback from 2020 Liveability Index to identify what each community values most and your priorities for your place.

The place plan will outline any updates to the strategy and town plan, including changes to future land use that responds to new information. Any changes to future land use outlined in the place plan will take precedent over the Anna Bay Strategy and Place Plan, ie. the place plan will perform an updating function.

This has caused a great deal of hold up with years of delays. Most recently, we have been advised that draft place plan making will be reported to Council in 3rd quarter 2022 (land use strategy only) to show locations where Council would consider a Planning Proposal and define a footprint for future proponent initiated planning proposals which does not include Anna Bay. Council are updating or re-mapping the whole area and Council are not accepting proponent initiated Planning Proposal until the maps and strategic work is complete.

We have also offered to provide assistance with flood studies. The Council are preparing a flood study and revising flood mapping layers and data is freely available on line (https://flooddata.ses.nsw.gov.au/). This was promised October 2021, however still not complete and on hold until circa June 2022, however, may be brought forward or pushed back. The study will inform a Floodplain Risk Management Plan (FRMP) which is expected to be finalised in 2023. Until such time as the FRMP is prepared, Council is not in a position to consider rezoning of land beyond existing flood free land.

The above issues or lack of strategic planning progress is not contributing to what should be the vision for the LGA with respect to legitimate opportunities for future housing.

Port Stephens Local Government Area Statistics

The NSW Government regularly reviews population projections to be able to understand and respond to unexpected events such as the COVID-19 pandemic, responding to drought, floods and catastrophic bushfire events. New population projections will be released in 2023 when the full suite of Census data is available.

The Port Stephens LGA population is projected to increase by 2036, to 92,650 (an increase of 18,550).

Dwellings needed by 2036 are projected to increase by 11,050 to 47,950.

The Plan identifies future housing and urban renewal opportunities as follows:

- Deliver existing Urban Release Areas at Fern Bay, Medowie and Kings Hill (future); and
- Investigate and deliver infill potential within the strategic centres of Raymond Terrace and Nelson Bay.

The Plan's intention is to expand the land captured and reset planning priorities.

This submission requests that further exploration for diverse and affordable housing opportunities be investigated in the whole of the Tomaree Peninsula, including Anna Bay where the Plan's priorities can be achieved.

It is considered that Anna Bay should be included for future housing opportunities Anna Bay is a "place" that is consistent with the Plan's intended co-ordinated planning for Hunter and Central Coast, Regional Vision for the Hunter, and, the purpose of the urban development program for the Central Lakes – District Planning and Growth Area.

The proposal to include Anna Bay is consistent with Plan's Objectives:

Objective 2: Ensure economic self-determination for Aboriginal communities

Objective 3: Create a 15 minute region made up of mixed, multi-modal, inclusive and vibrant local communities

Objective 4: Plan for "Nimble Neighbourhoods", diverse housing and sequenced development

Objective 5: Increase green infrastructure and quality public spaces and improve the natural environment

Objective 6: Reach net zero and increase resilience and sustainable infrastructure

Objective 7: Plan for businesses and services at the heart of healthy, prosperous and innovative communities

Objective 8: Build an inter-connected and globally focused Hunter

The Port Stephens Economic Development Strategy 2025 states:

"The supply of new housing in Port Stephens has been in decline since 2001, impacting housing affordability and the availability of new housing. Significant commitments to invest in Port Stephens to grow the regional and local economy and provide major infrastructure will attract new residents and drive additional demand for new housing in our area over the next 20 years.

A lack of rental vacancies is impacting many local businesses who are unable sustain an adequate workforce and have reported difficulties in attracting staff due to shortages of suitable accommodation.

Maintaining an adequate pipeline of new housing will be critical to sustaining healthy local economies and ensuring there are diverse housing opportunities in our area.

Place Plans are being prepared for our centres to build more liveable communities and improve the quality of life for residents. In some centres, Place planning will attract investment in new housing and in more diverse housing types.

Place planning will be a key part of addressing our housing supply shortage and in particular encouraging more affordable housing options."

Port Stephens contains a mix of rural land, towns, villages and coastal areas (largely focused along the Tomaree Peninsula) that are major recreational, tourist and retirement destinations. The regionally significant Newcastle Airport provides capacity to support growth in defence and aerospace-related industries.

Over the last 2 years, Council have been preparing Place Plans. Council's Strategic Planning Coordinator, Liz Lamb, suggests the place planning process builds on feedback from the 2020 Port Stephens Liveability Index:

"We start with the 2020 Liveability Index feedback to identify what each community values most and their priorities for their place."

The Liveability Indexes are the background report in which the individual place plan will be based on.

Anna Bay Liveability Index 2020 shows most residents believe government intervention is most important and underperforming.

The Plan recognises that Anna Bay is capable of being a well-planned, functional and compact settlement pattern that responds to settlement planning principles and does not encroach on sensitive land uses, including land subject to hazards, on drinking water catchments or on areas with high environmental values.

Planning priorities should consolidate growth in existing areas, support housing diversity, facilitating coastal walks between communities, and managing bushfire risks and impacts on the coastal environment. It is possible to create a green grid which will link open space, natural areas and recreation facilities, supplemented by the protection of areas with high environmental value and biodiversity corridors.

There is opportunity to provide high quality sustainable housing for young families, seniors wishing for a lifestyle change, airport staff, as well as low income households (manufacturing, retail and population serving community). Anna Bay can provide greater housing choice by delivering diverse housing, lot types and sizes, including small-lot housing in greenfield locations.

Opening up the opportunity to develop Anna Bay will promote development that respects the landscape attributes and the character of the metropolitan areas, towns and villages. The Plan's focus on development is to create compact settlements in locations with established services and infrastructure, including in existing towns and villages and sites identified in an endorsed regional or local strategy such as Anna Bay.

Housing demand trends show that due to the increase in the ageing population (the Hunter is expected to have 69,500 more people aged over 65 years old) alongside pressure on the cost of housing, there is a strong need for more adaptable, ground level, accessible and affordable seniors housing as well as housing types to suit the needs of students, short term visitors, visitors accessing health services and low income households, and families.

Single and couple only household growth is pushing the demand for smaller dwellings (studio, one bedroom and two bedroom) where there is currently predominantly three and four bedroom detached houses.

While there is a market in Greater Newcastle, coastal communities in Port Stephens such as Anna Bay can provide a solution to the need for more diverse housing (both permanent and temporary) with weekend and seasonal visitors needing for more short term accommodation and holiday homes in addition to social and affordable housing and support initiatives to increase the supply of affordable housing.

Anna Bay has the ability to expand it's rural villages and rural residential developable footprint. By well-considered sensitive planning, Anna Bay can contribute to the housing demand without impacting on strategic or important agricultural land, energy, mineral or extractive resource viability, aboriginal heritage or biodiversity values.

Suitable development for Anna Bay will consider ecological value, conservation and contribution to important biodiversity values or the establishment of important corridor linkages in particular addressing the Koala population as well as address flooding and bushfire constraints.

Development in consultation with the Worimi Local Aboriginal Land Council (the LALC) will achieve culturally sensitive compact connected settlements which will also provide for economic self-determination by facilitating expansion of the tourism development activities in agricultural or resource lands to integrate heritage culture.

It is worth noting the LALC and Port Stephens Council along with committed investors such as GAD Pty Ltd sign a Memorandum of Understanding (MoU) which will see all parties work in partnership to identify and unlock projects in the Hunter region, specifically Anna Bay, that will deliver increased housing affordability, supply, and diversity in the interest of the LALC's Members and the wider Port Stephens community.

This type of partnership is one built on mutual trust, reciprocity, and positive commercial outcomes.

Together development of Country not only for housing but also commercial and tourism enterprise can deliver social and economic outcomes back to the LALC community. This will provide opportunities for future generations and deliver projects that are ecologically sensitive, culturally aware, and sustainable in honour of the aspirations of our elders past and present.

An MoU enables development to contribute its expertise in master planning and development on Worimi land to support commercial outcomes for the LALC and will reaffirm the commitment to tackling affordability in the region.

New development land zone typologies and housing diversity can assist with the regional and rural communities who are often home to an ageing demographic which increasingly wants to age-in-place. This is considered best practice and reflected in the Aged Care Royal Commission's recent recommendation to increase in-home aged care by 80,000 new packages into 2022. Downsizers, ex-farmers, and older people in general will need housing which is easy to maintain, affordable and well-located with respect to key health and social services.

Greenfield estate development has long been on the Americanised trajectory of sprawling, detached, single-storey 'McMansions', limited footpath infrastructure, heavy car reliance, no minimum estate wide targets for universally accessible design, and other features that are incompatible with an ageing population, provision of cost-effective infrastructure, and climate change more generally.

Many development standards in the State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 foster the proliferation of single-storey family homes through fast-tracked approval processes and cookie-cutter checklists. Therefore, the development industry in most regional centres has little interest in delivering housing options outside their modus operandi of sprawling family homes, despite ABS data indicating the number of people per household in regional locations is more conducive to 1-to-2 bedroom dwellings.

Many growing regional towns are experiencing land use pressure. Greater diversity in housing types to match the needs of what many towns intend to be a more diverse economy and workforce is needed.

This may retain young single professionals who often seek smaller rental units particularly in regional towns and cities characterised by homogenous housing and limited rental markets. Meanwhile, underutilised land faces dilapidation as the prospect of overhauling heritage listed buildings or buildings subject to heritage conservation controls can be undesirable to many property developers.

Efforts need to be made (by Government) to support initiatives that deliver diversified housing. These might include: purpose-built rental accommodation; deliberative (resident led) or cooperative forms of housing development; and low-cost / shared-equity forms of ownership.

Employment in the Port Stephens LGA is expected to increase by 2036, to 34,475 (an increase of 5,665) within regionally significant centres and employment land clusters that will support global gateways such as Newcastle Airport and within Strategic centres such as Raymond Terrace and Nelson Bay.

Anna Bay is recognised as a centre of local significance along with Salamander Bay, Medowie, Karuah, Tanilba Bay, Lemon Tree Passage, Fern Bay, Hinton, Woodville and Seaham. Nelson Bay which is a stone's throw from Anna Bay is a primary tourist centre for the region and a hub for the Tomaree Peninsula where the Plan suggests should be investigated for high-density development to maintain and enhance the tourist, recreational and residential appeal of the centre. Anna Bay could provide the same level of balance with a future mix of permanent residential and tourist accommodation to enhance the vibrancy and appeal of the centre and surrounds.

Regional NSW is diverse, with some areas where locals compete with key workers from new industries and relatively affluent Sydney-siders seeking a 'tree or sea change'. In other areas, an aging local population struggles to downsize with local housing stock lacking diversity and accessibility. Furthermore, these areas face challenges of climate induced hazards and rising energy costs.

The private market has failed to provide enough quality, well-located affordable and diverse types of housing to cater the needs of the changing, growing and aging population. In collaboration with a proactive government this can be solved with private investment into developing suitable locations such as Port Stephens and more specifically Anna Bay.

There is an inadequate quality, supply and design of social, affordable and seniors housing across the nation. There is a need for more than 730,000 new social affordable housing properties over the next 15 years (with current social housing stock only 4% of Australia's total housing compared to the OECD average of 6%). Investment in quality social and affordable diverse housing should be a central part of a sustainable, inclusive economic recovery, including job creation.

Net Zero

The construction, operation and maintenance of buildings accounts for almost a quarter of greenhouse gas emissions in Australia. The NSW Government's commitment to Net Zero by 2050 is welcomed and the industry is undertaking significant steps to move towards that target. However, the current approach by the NSW Government to move the industry towards Net Zero is poorly thought out and will reduce the supply of homes and worsen affordability.

The NSW community is supportive of moving towards Net Zero in the development of new homes but is unwilling to pay a significant amount extra to achieve it. Given that NSW has some of the most expensive housing in the world this is unsurprising. If we are to achieve Net Zero, whilst avoiding reductions in the supply of new homes and increased housing costs to the homeowner, it is essential that the industry members and NSW Government work together.

A jointly developed roadmap that looks at how we can move towards Net Zero without reducing the supply of homes or worsening affordability would encourage investment and jobs into NSW and act as an exemplar for the world.

Draft Hunter Regional Plan 2041

It is recommended that the broader planning system:

- Bolster the legislative weight of local housing strategies and call for broader urban infrastructure investment
- Recognise Affordable Rental Housing as a form of infrastructure, requiring the development and application of Affordable Housing Contributions Schemes (requiring the fast-tracking of the review of infrastructure contributions) and other incentives
- Promote diversity of housing products through the planning system to create greater housing choice in regional centres (enabled by new Housing SEPP)
- Actively resist sprawl, encouraging any new residential developments in regional areas to be based on clustering dwelling patterns around established villages and centres
- Reconsider land zone typologies for rural and regional areas
- Forcefully require the timely development of rezoned land
- Address the confusing mix of legislation that applies to manufactured homes and manufactured home estates
- Increase regulation of the short term holiday rentals, also known as short term rental
 accommodation ('STRA') in the planning framework (reinforcing the primary of role of
 'housing' to be used for housing)
- Apply housing policy to address climate change, not exacerbate it and acknowledging the ongoing housing issues for disaster-affected communities
- Promote high-quality community engagement and co-design practices so that the necessary reforms and changes above are embraced.

The above recommendations relate to the private housing market and issues within the broad confines of the planning system.

Recommendations

This submission makes the following recommendations for consideration in response to the Draft Hunter Regional Plan 2041

- Consider our site in Anna Bay for inclusion as a growth area, which will provide legitimate housing
- Provide assistance and on-the-ground resourcing to local councils to ensure infrastructure contribution plans and value capture is proactive.
- Recognise social housing (in particular, public, affordable and adaptable seniors housing) as critical infrastructure.
- Influence LEPs to dramatically increase B4 and R3 zoned land in regional cities, and not simply using these land zone typologies as buffers to the commercial cores of regional cities.

- Ensure 'local character statements' are not manipulated limit change in areas which are already subject to ecological and heritage conservation controls.
- Provide guidance for urban fringe areas to be identified as workable E (Environmental land is now 'C' Conservation Land) or RU zoned land suitable to house the growing population.
- Reassess the viability of certain land zone typologies (particularly R2 and R5 zones at urban fringes when compared to R1, RU, and E (Environmental land is now 'C' Conservation Land)) and increase preference for other land zone typologies (R3 and B4 near commercial cores and employment hubs).
- Cluster new dwellings in greenfield areas as a means to limit the bushfire front for new estates, reduce the number of asset protection zones which need to be separately managed, and limit ecological fragmentation.

Conclusion

Building the 42,000 new homes that NSW needs every year is a significant challenge made more difficult by the need to also tackle climate change and achieve Net Zero by 2050.

To meet the challenge, the Greenfield Housing Market needs a consistent supply of development ready land with re-zonings approved, enabling infrastructure provided and biodiversity has been resolved.

This will require investment in enabling infrastructure by the NSW Government and Councils, fixing the biodiversity offsets market and significantly improving government co-ordination of infrastructure and land use.

Restoring consumer confidence and giving financing a boost are essential to getting construction going again sooner rather than later and minimising the increases in prices and rents that could occur with international borders now re-opened.

A steep change in supply also requires NSW to become a more attractive place for developers to invest. Reducing government red tape and the level of proposed infrastructure charges would encourage investment.

Reaching Net Zero in the building industry without undermining supply and affordability requires a collaborative approach between the government and industry to identify the best approaches and set out a roadmap that provides the certainty the industry needs.

The development industry can build the new homes that NSW needs to ease the housing affordability crisis. The recommendations in this submission will go a long way to enabling that to happen.



From:
To: DPE PSVC Hunter Mailbox
Cc:
Subject: - Submission to Hunter Regional Plan 2041
Date: Friday, 4 March 2022 9:52:26 PM
Attachments: Submission to Hunter Regional Plan 2041 (),pdf

Department of Planning, Industry and Environment Hunter Regional Plan Team PO Box 1226 NEWCASTLE NSW 2300

SUBMISSION TO DRAFT HUNTER REGIONAL PLAN 2041

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We look forward to discussing our submission with your planning team. Sincerely,



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Hunter Regional Plan team
Department of Planning, Industry and Environment
PO Box 1226
Newcastle NSW 2300

3rd March 2022

Dear Sir or Madam,

RE: draft Hunter Regional Plan 2041

Thank you for the opportunity to provide feedback on the draft Hunter Regional Plan 2041.

Bicycle NSW has been the peak bicycle advocacy group now in NSW for over forty-five years, and has over 30 affiliated local Bicycle User Groups. Our mission is to 'Make NSW better for all bicycle riders', and we support improvements to facilities for pedestrians and cyclists. We advocate for new cycling routes that incorporate dedicated paths within green corridors and the road environment to provide connections to jobs, schools and services for daily transport and recreation trips. Bike riding provides a healthy, congestion-reducing, low-carbon form of travel that is quiet, efficient and attractive for all ages with the correct infrastructure design.

Opportunities:

The first Hunter Regional Plan 2036 was published in 2016 and established a 20-year strategic vision for land use and growth in the region.

The new Regional Plan updates the vision with a greater focus on climate change and its impacts on water security and biodiversity. **Achieving net zero emissions** and **respecting traditional owners** are established as core guiding principles for all planning decisions, an important step for future resilience.

The eight new objectives and associated strategies respond to the wake-up call of the IPCC report of 2021, the accelerating move away from coal as a power source and the new work and travel patterns that have emerged during the Covid-19 pandemic. Bicycle NSW is delighted that several objectives stress the importance of increasing active travel as a means of achieving climate, health and liveability goals.

For example,

- Objective 4: Plan for 'nimble neighbourhoods' and diverse housing recognises that more medium
 density housing will promote the use of public and active transport, as well as meeting the needs of a
 diversifying and ageing population.
- Objective 5: Increase green infrastructure and quality public spaces and improve the natural
 environment aims to improve walking and cycling connections to public space, develop trails that
 showcase the region's natural features and rural landscapes and develop the street network as
 green corridors, shaded by increased tree canopy.

- Objective 6: Reach net zero and increase resilience and sustainable infrastructure sets out how
 compact urban areas that support walking, cycling and micro-mobility, and reduce car dependency,
 are key to reducing emissions.
- Objective 7: Plan for businesses and services at the heart of healthy, prosperous and innovative communities discusses the importance of being able to easily reach shops and services by bicycle in any strategy to support flourishing town centres, a night-time economy and sustainable tourism.

Bicycle NSW is most excited by Objective 3: Create a 15-minute region a made up of mixed, multi-modal, inclusive and vibrant communities.

The concept of more compact, mixed-use neighbourhoods has spread across the world, with the Covid-19 pandemic restrictions demonstrating the importance of vibrant, connected local centres where every day needs are close to home and can be met with a short walk or bike ride (or a car trip in rural areas).

Objective 3 provides strategic direction for land-use decisions that place new housing and infrastructure close to jobs and services to encourage active and public transport. This a major shift in policy for regional NSW where development has prioritised travel by private car for the last 70 years. A clever and thoughtful approach to the urban-to-rural transect ensures that 15-minute thinking can apply to the range of different contexts found in the Hunter: urban, brownfield infill, established suburbs, new greenfield suburbs, towns, villages or rural.

Bicycle NSW applauds the inclusion of the '15-minute region' in the draft Hunter Regional Plan and looks forward to seeing the model developed for the Hunter spread quickly across NSW.

The commitment to new active transport infrastructure will deliver innumerable benefits to the residents of the Hunter. Improved walking and cycling paths will contribute to connected and liveable communities, increase resilience to climate change, reduce carbon emissions and ignite new industries such as sustainable tourism. Creating safe and attractive routes to workplaces, schools, reserves and recreation facilities will foster healthy lifestyles and ensure equitable access to economic opportunities for people of all ages, incomes and abilities.

There has never been a better time to build for active transport, as evidenced in two very significant new Transport for NSW policies that require State projects to prioritize road space for walking and cycling:

- Road User Space Allocation Policy CP21000ⁱ establishes a road user hierarchy that considers pedestrians first and private cars last.
- Providing for Walking and Cycling in Transport Projects Policy CP21001ⁱⁱ requires every transport project funded by Transport for NSW to include provision for walking and cycling, which must delivered from the outset of the project. The policy applies to anyone planning, designing, delivering, building or managing a transport project or asset for, or on behalf of, Transport for NSW.

Bicycle infrastructure has a low cost per km, offering better value than road projects and supporting Councils' financial sustainability. Over 100km of bike paths can be delivered for the cost of 1km of new roadⁱⁱⁱ. Studies have shown that 70% of people in NSW either ride a bike now or would start to ride if safe infrastructure was provided^{iv}.

The urban design strategies developed for regional NSW by Government Architect NSW^v, acknowledge that private cars are likely to remain a dominant form of transport in regional areas. However, enabling active transport in town and village centres through good urban design and integrated land use planning will reduce

congestion, noise and car parking pressures. Pedestrian and bike riding infrastructure developed through the lens of the Movement and Place Framework will create more space for trees and landscaping, slow traffic and allow a more compact urban form.

High-quality shared paths through towns and villages will reduce dependency on private cars. In a region where 5% of households have no access to a car and many struggle to afford one, transport poverty is a serious issue. 22% of households have a weekly income below \$650, more than the NSW average of 19% vi, and inequality is likely to widen further with rising housing costs and changing employment patterns. If education facilities, workplaces and community facilities can be accessed safely on foot or by bike, families can be released from the financial burden of owning multiple cars.

Of course, bike riding facilities are proven to attract tourists and support the visitor economy. New businesses will be needed to support eco-, active and adventure tourism while existing businesses benefit from increased passing trade and foot traffic^{vii}. The Hunter Valley wine country already attracts touring cyclists but a focus on this market would bring substantial benefits as the mining economy fluctuates over the coming years.

Recommendations:

Bicycle NSW would like to be involved with the delivery of active transport infrastructure in the Hunter. We can offer expert advice at each stage, from the planning of walking and cycling networks to the detailed design of paths and intersections. Many of the relevant technical standards, policies and guidelines are drawn together on our website.

It is important for planners and engineers to consider the following when developing infrastructure for active travel. Please note that these recommendations are all reflected in the new Regional Cycling Plan that Bicycle NSW is developing with Transport for NSW.

Provide cycling infrastructure that is segregated from vehicles

Bicycle NSW supports bicycle infrastructure that is completely separated from vehicles on main roads to cater for riders of all ages and abilities. Mixed traffic cycle routes are only appropriate where speed limits or traffic volumes are very low.

According to the best practice 'cycling segmentation' model, developed in Portland USA to identify the type and needs of existing and potential bike riders^{viii}, such cycle paths will allow 70% of local residents to consider journeys by bike.

Where there are few pedestrians, shared paths through parks or on footpaths are a suitable solution. In areas with high levels of pedestrian and cycling activity, standard shared paths will not lead to an acceptable level of amenity and safety for either walkers or riders as conflict occurs between different users and separated cycle paths within the road environment should be considered.

Bicycle NSW recommends referring to the new Cycleway Design Toolbox^{ix} and the 2017 Austroads Cycling Aspects of Austroads Guides (AP-G88-17) to ensure that the paths are constructed to current best practice.

• Reduce speed limits to 30km/h in residential roads and town centres

30 km/h speed limits reduce the need for separate bicycle infrastructure on local streets. 30 km/h has been shown as an optimal speed limit to allow people driving and cycling to share the road safely^x and is becoming a standard speed limit in many parts of the world. All single lane roads in Spain have been under a 30km/h limit since May 2021 and 30% of UK residents live in 20mph areas^{xi}.

Lower speed limits are an important building block for Vision Zero, an approach to road safety that was launched in Sweden in 1994 with the simple premise that no loss of life is acceptable. The Vision Zero approach has been highly successful and has spread to many other countries. The key policies include prioritizing low urban speed limits, pedestrian zones, physical separation between bicycle and car traffic, data-based traffic enforcement and behaviour-change education^{xii}.

Future proof the active transport network

The status quo of walking and cycling activity in regional NSW is likely to change rapidly. The density of walkers will increase when new housing and employment is delivered as proposed. An upswing in travel by bikes has occurred recently due to COVID-19, individual reactions to climate change, a surge in online delivery services and the growing popularity of e-bikes. In addition, State policies to address climate change and urban liveability will add to pressures on councils to secure a much bigger travel share for walking and cycling. It is important to future proof the cycle network by allowing for increased demand at the outset. Paths should be wide enough for overtaking and must accommodate a range of mobility options such as cargo bikes and disability scooters. As discussed above, pedestrians and bike riders should be separated where possible.

Develop facilities for cycle tourism

Cycle tourism has enormous potential to attract visitors to regional areas and provide business opportunities for local residents. Rail trails are gaining momentum in NSW. The Tumbarumba to Rosewood trail has brought a constant flow of visitors to small villages in the area since it opened in 2020, supporting 9 new businessesxiii. The Northern Rivers Rail Trail will be a catalyst for the Tweed Valley becoming an important hub for cycling. Tourism on neighbouring Brisbane Valley Rail Trail (BVRT) is going from strength to strength. The BVRT is a great example of what can be achieved through community and government support. The Richmond Vale Rail Trail from Newcastle to the Kurri Kurri in the Lower Hunter is finally progressing and we hope this will inspire other Hunter LGAs to develop trails.

Dedicated infrastructure is not always required for tourist routes. Establishing a series of waymarked routes on scenic back roads and publishing maps and resources to promote cycle touring will draw cyclists from far and wide and support a vibrant rural economy. The Central West Trail near Dubbo provides a 400km waymarked loop that has revitalised several country towns since April 2020xiv, attracting thousands of cyclists to the area for a 5- or 6-day adventure. It is important for neighbouring LGAs to collaborate to facilitate longer touring routes.

Mountain biking is also very popular. The Blue Derby trails in north-eastern Tasmania provide an excellent example of bike tourism bringing economic benefits for local communities. \$3.1 million was invested in mountain bike trails in 2015. Now, more than 30,000 tourists visit the trails each year, injecting more than \$30 million back into the Tasmanian economy^{xv}. Dungog is seeing the benefits of attracting mountain biking with the development of the trails on Dungog Common.

Share bike rental hubs should be provided in tourist centres to ensure access to the trails for all visitors.

Facilities for e-bike charging, bike maintenance and bike storage need to be created in key locations.

Work with train and bus operators to allow carriage of cycles

Although bikes can be wheeled onto the CityRail services to between Newcastle, Scone and Dungog, they must be boxed and weigh under 20kg to be accepted onto the faster regional trains. Only a limited number of bikes (usually 5) can be carried on each train. Many bicycles, such as e-bikes and tandems, do not fit within the size and weight limits. This is a serious impediment to bike-related tourism, particularly as e-bikes grow in popularity, opening up cycle touring to a much broader demographic.

In view of the economic, health and environmental benefits of encouraging cycling, Bicycle NSW supports the campaign for new trains currently being procured by the NSW Government to have more space allocated to bicycles, with roll on/roll off storage replacing the requirement to box bikes. Please see https://bicyclensw.org.au/bikes-on-nsw-trainlink-campaign/ for more information.

We also suggest initiating discussions with bus operators to develop a strategy to allow bikes to be carried on buses. This will allow one-way trips, open up the cycle network to a wider range of users and provide access to trails and everyday destinations without using a car.

Improve safety on rural roads linking smaller towns and villages

Bicycle NSW has consulted with local cycling advocates and a common request is that the main roads connecting smaller villages are made safer for cyclists. In the short term, wide shoulders, signage, speed restrictions and intersection improvements are essential. In the longer term, separate cycle paths should be developed along key routes.

• Increase tree canopy cover over the walking and cycling network

Climate change is causing an increase in hot weather in regional NSW. Much of inland NSW experiences 10-20 days each year where the maximum temperature is greater than 35°C. Maximum summer temperatures are predicted to increase by 2.3°C by 2070 when 40 annual hot days over 35°C are likely^{xvi}. It is essential to create a tree canopy over footpaths and shared paths to ensure that they are comfortable to use in the warmer months, allowing opportunities for exercise and mitigating the health impacts of inactivity, such as diabetes and heart disease. The correct trees for the climate, soil and topography must be selected, and an adequate maintenance programme instigated. We recommend following the research being undertaken into heat resilient street trees at Western Sydney University through the Which Plant Where? Project.

Ensure that new cycle infrastructure is inclusive

All types of bikes should be accommodated by the cycling infrastructure, including cargo bikes and tricycles. Again, the width of the paths is critical and it is important to consider turning radii, dropped kerbs, ramps and the design of modal filters to ensure that non-standard bikes not excluded from the network. Cargo bikes will increasingly be used for deliveries and have huge potential to play a key role in a sustainable transport system. Non-standard bikes such as hand-cycles, recumbents and wheelchair bikes offer disabled people independent mobility but are a rare sight on urban streets due to barriers caused by poor urban design. Any measures enabling cycling by disabled people will support a growth in cycling by novice cyclists, children and older people, and improve conditions for those using mobility scooters^{xvii}.

• Prioritise pedestrians and cyclists at all intersections

Traffic light phasing and sensors must favour active modes to encourage more people to walk and cycle. In line with the Road User Space Allocation Policy and other State and local strategies, small delays to vehicle traffic should never prevent the delivery of safer, more efficient and more attractive active transport infrastructure. Raised crossings at unsignalised intersections will slow cars and improve safety. Bicycle paths must continue across the raised crossings so people riding bikes are not required to dismount.

Maintain a focus on the important details of the cycle network

The detailed design of cycle routes, adequate end of trip facilities, clear wayfinding and grass roots education are critical to encourage the uptake of cycling and reduce dependence on private vehicles.

It is essential to ensure that popular daily destinations such as town centres and schools are easy to reach by bicycle for all residents of all ages and abilities. In particular, safe connections with all education facilities along the routes must be incorporated. Cycling infrastructure needs to be safe and continuous to increase the mode share of cycling and reduce congestion associated with school journeys. Without proper separation from vehicles and safe intersections, parents will still feel driving their children to school and activities is the only way to keep them safe from being hit by cars.

Integration of the routes with bus stops is essential to ensure easy access by bike and foot. All public transport journeys start and finish with a walk or cycle. Providing high-quality, safe conditions for active travel to bus routes will break down the first/last mile barrier which can inhibit take-up of public transport.

Cycle paths should feature amenities such as water fountains, shading, seating, lighting, bike maintenance stations and toilet blocks.

Secure bike parking and other end of trip facilities, including charging points for e-bikes, should be provided at journey end locations to further support riders and encourage participation.

Wayfinding must support visitors by clearly articulating and communicating the most efficient and safest route. Signage style for wayfinding should be consistent throughout each LGA and reflect the diversity of the community.

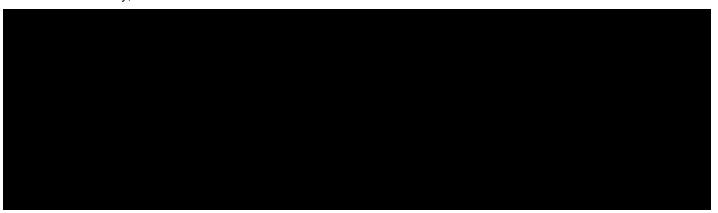
Finally, education, information and events to promote walking and bike riding as a form of transport are an important part of any plan to increase participation in active travel.

Conclusion:

Bicycle NSW encourages DPIE to take advantage of the process of updating the Hunter Regional Plan to lock in game-changing advances in active transport. Safe infrastructure to support walking and bike riding will benefit everyone in the community, reducing congestion and pollution while improving public health, providing more equitable access to employment, services and public transport and attracting tourism.

We look forward to working with Transport for NSW, DPIE, Local Government Authorities and local Bicycle User Groups of the Hunter region to progress the delivery of active transport infrastructure in the near future.

Yours faithfully,



ⁱ NSW Government, Road User Space Allocation Policy CP21000, [Online as at 19/2/2021] www.transport.nsw.gov.au/system/files/media/documents/2021/road-user-space-allocation-policy.pdf

ii NSW Government, Providing for Walking and Cycling in Transport Projects Policy CP21001, https://s23705.pcdn.co/wp-content/uploads/2021/02/providing-for-walking-and-cycling-in-transport-projects-policy.pdf
iii PIA. 2013, Sept 3. https://www.planning.org.au/documents/item/5578

https://quickstats.censusdata.abs.gov.au/census_services/getproduct/census/2016/quickstat/106?opendocument vii Jerome N Rachele. Do the sums: bicycle-friendly changes are good for business, The Conversation [Online as at 24/2/2021] Do the sums: bicycle-friendly changes are good business (theconversation.com)

viiixvi Roger Geller. (2009). Four types of cyclists. Portland Bureau of Transportation.

https://www.portlandoregon.gov/transportation/article/264746

ix Cycleway Design Toolbox: designing for cycling and micromobility. Transport for NSW.

https://www.transport.nsw.gov.au/system/files/media/documents/2021/Cycleway-Design-Toolbox-Web.pdf

^x City of Yarra - 30km/h speed limit: pre-trial final report, 2017. https://thanksfor30.com.au//sites/default/files/2018-08/City-of-Yarra-Pre-Trial-Report-Aug-2017-FINAL%5B1%5D.pdf

xi O'Sullivan, F. (2020, November). Why Europe is slowing down. Bloomberg CityLab. https://www.bloomberg.com/news/articles/2020-11-18/speed-limits-are-dropping-in-europe-and-the-u-k

xii Vision Zero Network. (2015, April 13). European Cities Lead the Way Toward Vision Zero.

https://visionzeronetwork.org/european-cities-lead-the-way-toward-vision-zero/

xiii Railtrails Australia. 2021, April 18. Local economy thrives since the opening of the Tumbarumba to Rosewood Rail Trail. https://www.railtrails.org.au/2021/897-local-economy-thrives-since-the-opening-of-the-tumbarumba-to-rosewood-rail-trail

- xiv Central West Cycle Trail. https://centralwestcycletrail.com.au/
- ^{xv} AMB Magazine. 2021, July 29. Riding to the edge. https://www.ambmag.com.au/feature/riding-to-the-edge---understanding-logging-around-blue-derby-trails-568005/page3
- xvi Upper Hunter Shire Council LSPS 2020. https://upperhunter.nsw.gov.au/f.ashx/documents/plans-and-reports/Local-Strategic-Planning-Statement-2020-Adopted-by-Council-25-May-2020.PDF
- xvii Wheel for Wellbeing. 2020. A Guide to inclusive cycling. https://wheelsforwellbeing.org.uk/wp-content/uploads/2020/12/FC_WfW-Inclusive-Guide_FINAL_V03.pdf

iv Byron Shire Bike Plan. 2019. https://www.byron.nsw.gov.au/files/assets/public/hptrim/traffic-and-transport-planning-medium-and-long-term-development-transport-strategies-2013-2020/byron-shire-10-year-bike-plan-2019-final-adopted-plan-only-without-appendix-24.2017.50.1.pdf

^v Government Architect NSW. 2020. Urban Design for Regional NSW. https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/urban-design-guide-for-regional-nsw-2020-06-03.pdf

vi Australian Bureau of Statistics. Quickstats for Hunter Valley SA4 2016.

From:

To:

DPE PSVC Hunter Mailbox

Subject: Draft Hunter Regional Plan submission
Date: Friday, 4 March 2022 11:40:38 PM

Attachments: 220303 Draft Hunter Regional Plan submission.pdf

Dear Hunter Regional Plan team,

Please find attached feedback from Bicycle NSW on the draft Hunter Regional Plan 2041.

Please do not hesitate to contact us if you have any questions. We look forward to reviewing the final plan in due course.

Many thanks and kind regards,

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From:
To:
DPE PSVC Hunter Mailbox
Subject:
Draft Hunter Regional Plan 2041
Friday, 4 March 2022 11:50:56 PM

Comments

I am gravely concerned that the review of the Hunter Regional Plan 2036 has resulted in a draft plan with a perspective that reduces the value of nature to what it can do for humans.

Goal 2 of the 20 year plan published in 2016 was to protect biodiversity and connect areas of high environmental value. It included the action to "Improve the quality of, and access to, information relating to high environmental values".

This goal has been translated to:

<u>OBJECTIVE 5</u>: Increase green infrastructure and quality public spaces and improve the natural environment.

Conservation of biodiversity must be a regional priority. The risk of extinction of fauna and flora species in the Hunter Region must be recognised in the Plan.

The Regional Plan should include proposed priority conservation lands on the District Planning Priorities maps. The indications of biodiversity corridors are useful but there are also areas which are irreplaceable for preservation of species. There must be constraint on development.





Hunter Branch hunter@npansw.org.au

Department of Planning and Environment PO Box 1226 Newcastle NSW 2300

By email to: hunter@planning.nsw.gov.au

Dear Sir / Madam

DRAFT HUNTER REGIONAL PLAN 2041

The Hunter Branch of the National Parks Association of NSW (NPA) offers the following comments on the draft Hunter Regional Plan 2041 (Draft Plan).

NPA is a member-based, not-for-profit organisation dedicated to protecting nature through community action. Our conservation activities are focused on securing a diverse and resilient network of national parks and other protected areas, while also promoting appropriate use, planning and management of natural resources across the wider landscape.

Where is the 'review'?

The Draft Plan is intended to replace the Hunter Regional Plan 2036 (the 'current plan'), which itself is the successor to many previous plans going right back to the 1952 report on the Town and Country Planning Scheme for the Northumberland County District. Apart from a passing mention on page 10, the Draft Plan does not make any reference to the current plan, or for that matter, to the 70 years of regional planning endeavour in the Hunter.

We note that section 3.5 (5) of the Environmental Planning and Assessment Act specifically requires a regional strategic plan to be reviewed, if directed by the Minister. By its ordinary meaning, a 'review' entails "a formal assessment of something with the intention of instituting change if necessary" (Oxford English Dictionary). In the context of strategic planning, this might be expected to include an appraisal of the current plan's assumptions, objectives, achievements, deficiencies and continuing relevance.

No analysis is presented on any of these matters, although a brief reference is made to an audit of planning proposals (i.e., 'spot rezonings'). This makes it difficult to understand the necessity, basis or rationale of the Draft Plan as presently proposed. In the absence of evidence to the contrary, we conclude that the current plan has not in fact been reviewed. This raises questions about the legitimacy of the Draft Plan. If a formal review has been carried out, we would be interested to learn more about the process that was undertaken, any directions issued by the Minister relating to the review, the parties who participated in the review, and of course, the actual findings of the review.

The Department should take a much more rigorous and transparent approach to evaluating its regional strategic plans. This might, for example, include commissioned reviews prepared by academic or independent experts. These comments are equally relevant to other regional strategic plans currently being prepared.

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abn: 67 694 961 955

More substance needed

Our overriding criticism of the Draft Plan is its lack of substance. Despite an extra 48 pages, it contains even less substance than its predecessor. The Draft Plan presents 8 general objectives (of about 10-15 words each). 'Strategies' for realising each of the objectives take the form of broad-brush statements that are not clearly linked to substantive actions, fiscal programs or implementation mechanisms, nor are there targets that would enable progress to be evaluated at the next 5 year review. There are only two "Actions" in the entire Draft Plan (at pages 25 and 47). These amount to the grand sum of 85 words, compared to the Draft Plan's total word count of about 34,700 (0.2%).

To put things in perspective, the ACT Planning Strategy 2018 (which performs a comparable role for a somewhat similar population) devotes 7.5% of its 29,600 words to "Actions". This is a crude comparison, but the difference is so glaring that is speaks for itself (a factor of 26 times).

The Draft Plan falls well short of the intention that regional strategic plans present strategies and actions for achieving their objectives. Without clear mechanisms or targets, it is difficult to see how the Draft Plan makes any practical difference to what would happen anyhow. Much of the Draft Plan reads and looks more like a promotional brochure, rather than a serious basis for decision-making. Most of the photos and artwork are purely decorative, and do not add to interpretation.

We believe the Draft Plan should provide stronger and more ambitious direction, leadership and guidance on a variety issues. The following sections provide important examples.

Mining and energy sector

While welcoming the broad objective for economic diversification, the Draft Plan should also address other important issues relating to the mining and energy sector. Coal mining has undoubtedly added to the region's economic prosperity, but it has also incurred serious environmental costs of intergenerational proportions. The inadequate incremental framework for dealing with Upper Hunter mining projects has without doubt been one of the State's greatest regional planning failures.

An end to coal expansion

The Draft Plan (at page 79) continues to note the potential for further mining expansion. Admittedly, this would be consistent with the NSW Government's *Coal and Gas Strategy* (2011), and the more recent *Strategic Statement on Coal Exploration and Mining* (2020). The latter identifies a number of 'investigation areas' for new mining operations, most of which are within or adjacent to the Hunter Region (including Doyles Creek, Giants Creek, Hawkins-Rumker, Gloucester, Wollar and Wollombi).

However, current policy is hopelessly out of step with the global context, and does not reflect the rapid transformation presently occurring within the energy sector. For example, the International Energy Agency has advised that no new coal mines or mine extensions are required beyond those already committed as of 2021 (IEA 2021, Net zero by 2050: a roadmap for the global energy sector, p. 21). Indeed, energy analysts are pointing to a much speedier exit from fossil fuels than previously predicted.

The Draft Plan provides an appropriate opportunity to rule a line through further coal and gas expansion within the region, thereby giving a clear policy signal to investors.

Repairing the mining legacy

Open cut mining has resulted in the fragmentation, degradation or complete displacement of a variety of natural assets in the Hunter Region, including agricultural land, natural habitat, aquifers, rivers and scenic quality. Such changes are not easily reversible, resulting in a landscape that will be physically and ecologically scarred for generations. In a well-known pattern observed in other former mining regions throughout the world, damaged landscapes can shape negative perceptions, stifle capital investment, and promote intergenerational social disadvantage. Indeed, some of the very earliest regional plans produced in Germany and Britain in the 1920s were specifically concerned with correcting these issues.

Economic diversification, renewable energy projects and 'post-mining land use principles' (as set out on page 25 of the Draft Plan) will not by themselves repair the landscape, although they are likely to be part of the solution. What is missing from the Draft Plan is positive commitment and a concrete strategy for

recovering, repairing and re-imagining the post-mining landscape. We do not believe that this can be meaningfully achieved through the application of individual mine rehabilitation plans alone. It requires a district level framework that links economic and environmental measures, backed up by secure funding and a delivery/ accountability mechanism. Allowance will need to be made for the possible early closure of many mines, as this will completely alter the assumptions on which individual mine rehabilitation plans are based.

Renewable energy rush

The kind of incremental approach that was adopted for the 1980s Upper Hunter coal rush should not be repeated for the 2020s renewable energy rush, otherwise similar planning failures will occur. For example, proposals are already being drawn up for solar farms that involve clearing of significant areas of remnant native vegetation, without reference to cumulative impacts. There is an urgent need to undertake a strategic environmental assessment to establish a wider framework for considering individual proposals, and to steer proposals to locations that would minimise environmental and other impacts while maximising community benefits.

Renewable energy generation is also creating the need for additions to the transmission grid. New transmission lines and rationalisation of existing lines should be part of the strategic assessment referred to above. We are particularly concerned with proposals to route transmission lines through national parks and other protected areas (such as Goulburn River NP). With easements up to 500 metres wide, this can result in substantial fragmentation of natural habitat, completely degrading the values for which a reserve is protected.

Overhead transmission lines within protected areas are no longer considered acceptable practice in other comparable countries. Amplification of bushfire risk due to climate change is a further issue, as transmission lines through bushland areas present both an ignition source and supply interruption risk. Only underground techniques should be employed if construction across a protected area is unavoidable (such as trenching, tunnelling or directional drilling).

One of the key benefits of renewable energy is the increasing potential to maximise the amount of energy generation undertaken within urban areas themselves. This minimises the need for additional transmission lines, reduces transmission losses and avoids landscape fragmentation. The issue needs to be factored into urban design policies.

'Watagans to Stockton Link' and the 'National Pinch Point'

The 'Watagans to Stockton Link' was first identified by the Lower Hunter Regional Strategy (2006) as one of two biodiversity corridors having major regional significance. While it continues to be acknowledged by the Draft Plan, it has changed colour from a biodiversity corridor to one that "is intended to accommodate national transport infrastructure" (page 48).

The 'National Pinch Point' is the sector generally bound by Thornton, Kurri Kurri, West Wallsend, Sandgate, Tomago and Williamtown. Traversed by the Hunter estuary, it is subject to the intersection of more high-level planning objectives, constraints and issues than probably any other location within the region. Key issues are of national or regional significance. They include (in no particular order):

- Watagans to Stockton Link (biodiversity)
- East coast rail freight link
- Pacific Highway
- Hunter Expressway
- Newcastle Maitland (Cessnock) passenger rail link
- East coast high speed rail link (potential)
- rail link to Newcastle Airport (potential)

- national supply chain disruption (flooding)
- · internationally significant Ramsar wetlands
- crossing of Hunter River estuary
- aquifer water source (Tomago)
- urban expansion
- corridor protection from urban expansion
- · regional cycle links and recreation

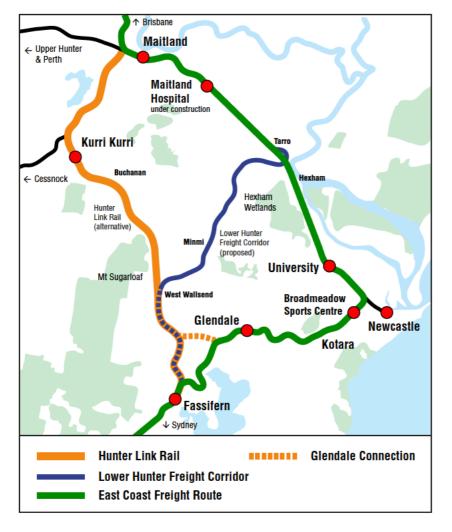
In this context, it is appropriate to emphasise that the purpose of regional planning is not to facilitate or address single issues, proposals or problems, but rather to resolve the whole complex of problems,

taking into account their inter-relationship. This requires a multiple-objective outlook that is not inherently biased to any one objective over the others.

Our particular concern is that regionally significant nature conservation opportunities are being lost because of a narrow 'silo' approach to the planning of transport proposals. This is demonstrated, for example, by the Lower Hunter Freight Corridor Draft Strategic Environmental Assessment, prepared for Transport for NSW, and released for comment in 2021 in conjunction with a proposal to amend State Environmental Planning Policy (Major Infrastructure Corridors) 2020. The study assessed a particular project (Fassifern-Hexham/ Tarro bypass), but did not consider alternatives other than minor alignment variations. Yet there are known to be other options, such as the 'Hunter Link Rail' proposal, that could potentially provide superior benefits from multiple perspectives, including rail freight, passenger rail, nature conservation, metropolitan structure and avoidance of Hexham flooding (see diagram below).

The intersection of planning objectives in the 'National Pinch Point' is such that silo planning by each transport agency for each individual transport project will lead to suboptimal planning outcomes, lost opportunities, and 'death by a thousand cuts' to the integrity of the Watagan-Stockton biodiversity link. The discussion on page 75 of the Draft Plan titled 'National Pinch Point Growth Area' does not come to grips with the complexity of issues involved, nor does it present an adequate framework for national infrastructure decisions totalling many tens of billions of dollars. It is a recipe for non-planning.

We therefore call upon the Department, perhaps in collaboration with its Commonwealth counterparts, to commission appropriate studies and plans that are capable of doing justice to the complexity involved, and that are undertaken independently of proponent agencies. Some fundamental thinking will be required to work through the many hydrological, ecological, transport and urban structure issues. A particular expertise in the planning of estuarine areas is required. The world leader in this field is probably the Netherlands.



The Hunter Link Rail proposal is an alternative to the 'Lower Hunter Freight Corridor' that offers a variety of additional benefits, including:

- avoidance of conflict with biodiversity corridor
- avoidance of Hexham flood zone
- shorter distance to Brisbane
- passenger connectivity between Glendale and Kurri Kurri

See enclosed submission on the Lower Hunter Freight Corridor (Aug 2021).

Biodiversity values

Strategies 5.6 to 5.9 in the Draft Plan are so vague that it is difficult understand how they affect or change anything in the absence of specific supporting actions.

Attention is drawn to Appendix D of the draft Central Coast Regional Plan 2041 ("Guidance for application of biodiversity avoidance criteria"). This appendix presents criteria that is reasonably concrete, and should also be incorporated in the (Hunter) Draft Plan. It is difficult to understand why it isn't presently included, since both plans are supposed to have been prepared on a common basis.

Action 2 of the Draft Plan ("to progress the Central Coast strategic conservation planning program and consider opportunities to undertake further strategic conservation planning in Morisset") has no clear outcome or target. This can be corrected by including a specific program for expanding the conservation reserve network in the Morisset-Lake Macquarie area, supported by a suitable outline map.

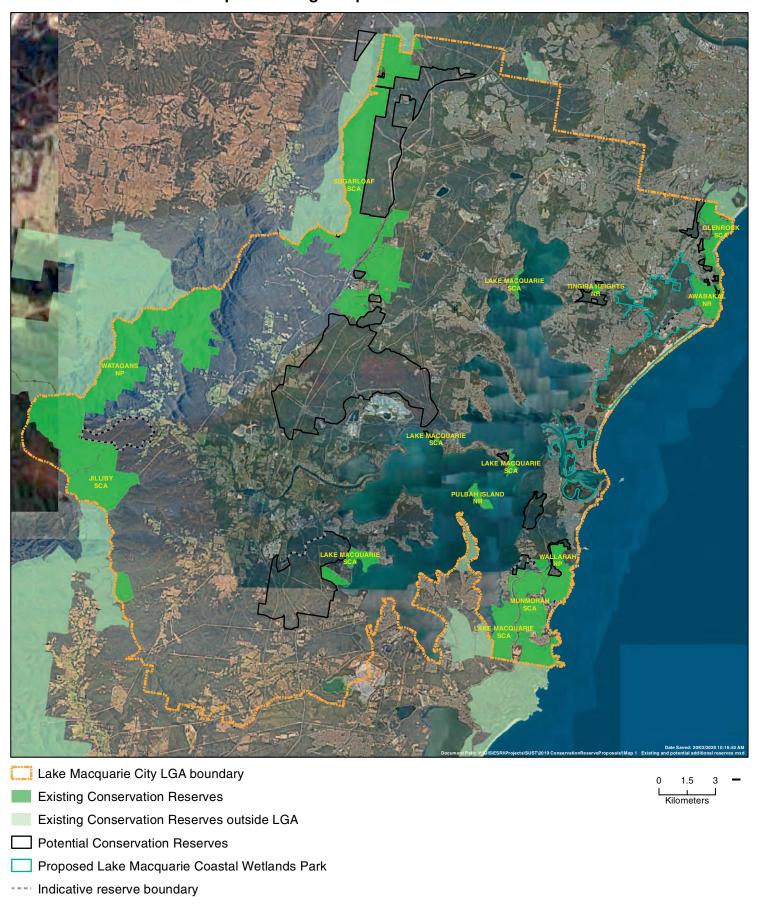
Such a map was prepared by Lake Macquarie City Council in 2020 and submitted to the then Minister for Environment, Matt Kean (see "Potential Conservation Reserve Investigation Areas in Lake Macquarie LGA" on the next page). Some of the potential reserves shown, including the Awaba Nature Reserve proposal between Awaba and Dora Creek, and the Lake Macquarie Coastal Wetlands Park, are actually outstanding proposals from *Hunter 2000* (1972). This report was commissioned by the State Planning Authority, and became an action of the *Hunter Regional Plan No. 1* (1982).

Conclusion

It's acknowledged that a regional plan should act as a broad framework, but there is little that is particularly concrete or ambitious about the Draft Plan, nor is there much in the way of commitments, outcomes or targets that could be monitored or evaluated. Many local councils prepare local strategic plans that offer a clearer direction (albeit geared to a different scale), with less gloss and probably on a much lower budget. Given that the present format is being rolled out throughout the State, the Department might usefully look at better models from interstate and overseas.



Potential Conservation Reserve Investigation Areas in Lake Macquarie LGA Map 1. Existing and potential additional reserves



Note: Potential boundaries are based on lot boundaries. Dotted lines identify indicative boundaries.



Hunter Branch hunter@npansw.org.au

Corridor Investigation Office Transport for NSW PO BOX K659 Haymarket NSW 1240

Via email to: corridors@transport.nsw.gov.au

Dear Sir / Madam

LOWER HUNTER FREIGHT CORRIDOR

Thankyou for the opportunity to comment on the proposal to identify and protect the Lower Hunter Freight Corridor under State Environmental Planning Policy (Major Infrastructure Corridors) 2020.

The National Parks Association of NSW is a member-based, not-for-profit conservation organisation dedicated to protecting nature through community action. Our work is focused on securing a diverse and resilient network of national parks and other protected areas, while also promoting appropriate use, planning and management of natural resources across the wider landscape. We have a specific interest in the proposal because of its relationship to regional biodiversity corridors.

Watagans to Stockton Link

The proposed route for the corridor between West Wallsend and Taro-Hexham shares the same linear axis as the 'Watagans to Stockton Link'. This is a mapped biodiversity corridor identified by the *Hunter Regional Plan 2036*. It was first recognised by the *Lower Hunter Regional Strategy* (2006) as one of two biodiversity corridors with major regional significance. The corridor is more fully discussed in the *Lower Hunter Conservation Plan* (Dept Environment and Conservation, 2006).

The proposal, if constructed, would further fragment this corridor, significantly reducing its landscape connectivity function and value. Impacts would be greatest between Minmi and Weakleys Drive.

While the *Hunter Regional Plan 2036* identifies the intention to 'accommodate national transport infrastructure', it also identifies an equal intention for the corridor to support and promote regional habitat connectivity. The Regional Plan does not specify that either objective has priority over the other. Clearly, both objectives need to be respected.

The Explanation of Intended Effect for the planning proposal does not refer to or in any way discuss the tension between these two objectives, nor how it might be resolved. The documentation presented to the public fails to consider the proposal within its wider regional context, yet major infrastructure proposals of this kind generally play a major role in shaping regional growth patterns. This points to the need to consider alternatives.

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abn: 67 694 961 955 donations are tax-deductible and gratefully received



Alternatives

The published documentation for the proposal does not consider any substantive alternatives, other than several deviations of the same general route and a 'do nothing' option. It is evident that the proposal has been conceived from a narrow, freight transport perspective.

We draw your attention to the Hunter Link Rail concept, which has been discussed in various circles since the 1990s (see attached map). It offers a significant alternative that is directly relevant to the current proposal.

Hunter Link Rail utilises existing corridors to connect Fassifern, Glendale, Kurri Kurri and Maitland. It provides a much shorter freight by-pass of Newcastle, reducing the east coast freight track length to Brisbane by approximately 22 km, compared to only 10 km for the Lower Hunter Freight Corridor currently being considered.

From our perspective, the major advantage of the Hunter Link Rail option is that it would have little or no impact on the Watagan - Stockton biodiversity corridor. This is because tunnelling would be utilised to cross the northern flank of the Sugarloaf Range.

Other benefits relate to its avoidance of flood-susceptible sections near Hexham, and its potential to accommodate passenger movement in addition to freight. The latter feature would create a coherent metropolitan rail network that would link up key employment, health, education, sporting and cultural centres across the Lower Hunter. Part of our attraction to the Hunter Link Rail concept is that it would support a sustainable metropolitan structure, allowing future population growth to mutually co-exist with the natural landscape. With population tipped to reach the million mark later this century, we believe this presents an enormously valuable opportunity, and warrants further investigation.

It is likely that the Hunter Link Rail would be a more expensive option. However, this would need to be weighed up against environmental and other benefits. A proper feasibility study is needed so that useful comparisons can be made.

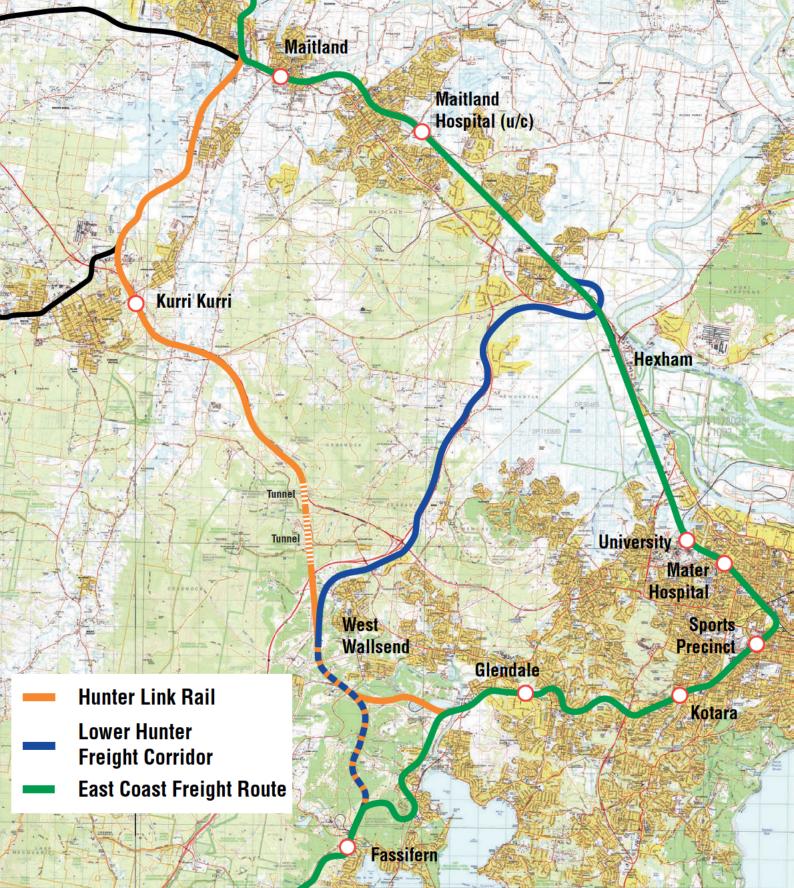
We express concern about the absence of co-ordination with other projects. The documentation for the MI Motorway link between Beresfield and Raymond Terrace, which is currently on public exhibition, does not refer to the adjacent Lower Hunter Freight Corridor (see Chapter 23 relating to cumulative impact assessment). Flooding issues are likely to be significant in this locality.

Conclusion

Proper consideration has not been given to promoting the landscape connectivity objectives of the Hunter Regional Plan. It seems clear to us that the Lower Hunter Freight Corridor does not represent the best available option. We suggest that the appropriate way forward is to consider alternatives that can better satisfy a wider range of objectives.

We request that the Hunter Link Rail and other alternatives be evaluated from a broad regional planning perspective, including their contribution to metropolitan structure, regional accessibility, freight transport and protection of landscape connectivity. In the interim, it would be highly appropriate to protect the Hunter Link Rail corridor under the Major Infrastructure Corridors SEPP.





From:
To:
DPE PSVC Hunter Mailbox
Subject:
Hunter Regional Plan 2041
Date:
Monday, 7 March 2022 9:34:07 AM

Attachments:

Please find attached a submission on the draft plan Regards



From:

DPE PSVC Hunter Mailbox

To: Subject: Draft Hunter Regional Plan - Submission _ Cessnock City Council

Date: Monday, 7 March 2022 4:15:37 PM

Attachments:

image001.jpg image002.gif image003.gif

Importance:

High

Good afternoon,

was granted permission to lodge the above submission today.



I acknowledge Aboriginal people as the traditional custodians of the land on which Cessnock City Council offices and operations are located, and pay my respects to Elders past, present and future.



4 March 2022

Department of Planning and Environment GPO Box 39 SYDNEY NSW 2001

Via Planning Portal

Dear Sir / Madam



Submission – Draft Hunter Regional Plan

Thank you for the opportunity to provide feedback and commentary on the Draft Hunter Regional Plan (Draft HRP).

Cessnock City Council (CCC) is experiencing considerable growth pressures, particularly in relation to the creation of new Urban Release Areas (URAs) and the ability to provide adequate support infrastructure for existing and new communities. A key challenge for CCC is balancing pressure from population growth, maintaining the village character and establishing itself as a key center in the Greater Newcastle Metropolitan Area.

General comments

It is noted that the Draft HRP is considerably different to the Hunter Regional Plan 2036 (HRP 2036), introduced in 2016. Council's key planning documents such as the Local Strategic Planning Statement (LSPS), have been written to be consistent with the HRP 2036. Such fundamental shifts in Strategic Planning every five years, makes it difficult for councils to undertake long term planning and achieve the aims and objectives in their local plans.

The objectives included in the Draft HRP are quite broad, with limited detail on how they are to be achieved and who is accountable for their delivery, including achievable regional actions. The document, in its current form, is difficult to assess a planning proposal against. It is recommended that clear principles be provided, which can be used by councils when assessing planning proposals. It is also recommended that a monitoring and reporting framework is established, implemented and regularly reported on by the NSW Government to ensure transparency and accountability around the delivery of the Regional Plan.

Place Delivery Group

The Draft HRP identifies that place strategies will be overseen by a place delivery group chaired by the Department of Planning and Environment (DPE), including relevant public authorities, infrastructure providers and local Aboriginal land councils (LALCs) and local councils. Improved alignment of infrastructure, planning and collaboration across government through the Place Delivery Group (PDG) is welcomed. To function successfully (i.e. with efficient and effective decision-making) and to provide certainty when planning significant growth areas, it is recommended that the PDG:

- Include all relevant state agency and utility representatives, such as Hunter Water and Ausgrid, to allow the group to consider all infrastructure simultaneously in planning for growth areas.
- Be provided with certainty on the provision of infrastructure in precinct planning. There is concern the PDG will have difficulty achieving this as most state agencies are unable to commit to infrastructure provision without funding available.
- Be clear on how commitments to place strategies and the associated infrastructure is to be addressed.

To be effective at a broader governance level, the PDG therefore requires the necessary authority and/or statutory backing to be able to compel or make agencies and other delivery partners accountable for the delivery actions assigned to them. Ensuring that the delivery, monitoring and evaluation systems established by the PDG are clear around delivery responsibility, the outcomes to be realised, the reporting obligations of delivery partners and the triggers / processes for amending priorities will be critical to successful implementation of the Draft HRP's objectives.

Changes to place strategies

Page 20 of the Draft HRP contains a table with a number of different areas in the Hunter and their intended purpose. Column 4 of the table lists areas to 'promote growth leveraging its unique characteristics'. This column lists the Hunter Valley Viticulture Precinct. While we agree that the Viticulture precinct is unique, we are concerned by the use of the term 'promote growth'. It is possible that this will give developers unrealistic expectations for development potential in the Cessnock Vineyards District. This is particularly concerning when Council is trying to <u>balance</u> the mix of tourist and other non-agricultural development with agriculture and viticulture in the area. The Cessnock Vineyards District is, after all, a <u>primary production area</u>.

Objective 1: Diversifying the Hunter's Mining, energy and industrial capacity

Environmental issues should have a greater focus in the Draft HRP. For example, if mine sites aren't returned to a pre-mining state then they should be contributing to environmental or biodiversity outcomes elsewhere in the Hunter Region. Greater emphasis should also be given in Strategy 1.1 to integrating substantial environmental outcomes with any alternative use of disused coal mine voids.

We assume that the text in the grey box on Page 26 of the Draft HRP is intending to explain the term 'circular built environment'. If this is the case, the text in the grey box should directly reference 'circular built environment' to make it clear what is being referred to.

Objective 2: Ensure economic self-determination for Aboriginal communities

Strategy 2.1 states "The HRP and LSPSs can be aligned to provide a framework to achieving self-determination by: facilitating the prompt, efficient and equitable return of land to Aboriginal communities." This is done under the Aboriginal Land Rights Act and administered by the DPIE. It is unclear what role the LSPS and HRP have in this process. This matter needs to be clarified in the final version of the HRP.

Objective 3: Create a 15 minute region made of mixed use, multi-modal, inclusive and vibrant local communities

Achieving a 15 minute region and a 30 minute connected community presents significant challenges to villages in the Cessnock LGA, particularly in areas identified as 'hinterland'. The objective will be easier to achieve in centers like Kurri Kurri, Cessnock and Branxton. If the objective is to achieve this in the hinterland region substantial investment will be needed by Government. This also has the potential to change the character of villages which residents value.

The term 'incomplete village' on page 33 could be further explained, or perhaps a different terms used. It could be perceived as negative. The term 'large scale development' in strategy 3.8 should be further expanded or explained to avoid confusion at a planning proposal stage as to what is required. We find Strategy 3.9 confusing with the terminology that is used, e.g. urban condition, urbanizing contexts, etc.

Objective 4: Plan for 'nimble neighborhoods', diverse housing and sequenced development

The role that the market plays in providing diverse housing should also be acknowledged. There is only so much local government can do to encourage diverse housing. A suggestion is that feasibility studies be provided to the market to show if there is a demand for different types of housing.

Strategy 4.7. Lifestyle villages are not typically a more affordable housing option and they are not self-sufficient. They often tend be located in clusters and place a heavy reliance on the existing community infrastructure, e.g. medical services, pedestrian infrastructure, etc.

A statement is needed in Objective 4 when discussing growth to ensure that the character of villages is protected.

The regional housing benchmarks provided in the plan are vastly different to what is currently being achieved. More direction is needed on how these targets are to be achieved. Similarly the optimum density targets outlined in the document (50-75 dwellings per hectare) are significantly above the current 10-12 dwellings per hectare being achieved in some areas of the Cessnock LGA. More direction is needed on how regional areas are expected to achieve these higher densities. Consideration should also be given to the role of the development industry and housing market in achieving this target.

Page 40 identifies Paxton as a potential future growth area. It is uncertain how or why Paxton was identified. Page 39 states that LSPS's provide the basis for determining the location for new communities. Neither the Cessnock LSPS or Council's Urban Growth Management Plan (UGMP) identify Paxton for growth. Long term growth is identified in other areas, including Sawyers Gully and Mullbring. If the objective of the map on page 40 is to plan for growth beyond that identified in Councils current documents, other areas such as Central Hunter and Stony Pinch should be considered before Paxton. The Cessnock LSPS identifies the need to protect the integrity of the villages, particularly Ellalong, Paxton and Millfield. The planning for rural villages, including any opportunities for expansion should be restricted, and only enabled where supported by infrastructure, a local growth strategy and community consultation. Council would be happy to work with DPE to identify a more suitable site than Paxton.

Notwithstanding the above, as a 20 year plan, nominating growth areas beyond this period could promote expectations for development to be brought forward, in the absence of supporting infrastructure.

Strategy 4.9, relating to dwellings on rural land, is supported, however the text could be more definitive.

Objective 5: Increase green infrastructure and quality public spaces and improve the natural environment

If the aim of Strategy 5.6/5.7 is to protect biodiversity, a Strategic Conservation Plan for the Hunter (or at least Growth Areas) should be undertaken. In the absence of this, and as a minimum, guidance and support from DPE should be provided to local councils and developers to ensure that rezonings in these areas are bio-certified in conjunction with the rezoning process. This is particularly relevant in areas that are subject to major development pressure.

Hunter Expressway Corridor Growth Area

The size of some of the growth areas and how they function should be reconsidered. For example Kurri Kurri and Loxford are proposed as one growth area. While there will certainly be connectivity between Main Road and Hart Road, they need to be planned for separately and have different development pressures feeding into each Hunter Expressway (HEX) interchange. There is also not a lot of unconstrained land left around the Main Road Interchange. The HEX principles should address provision of sites for bus interchanges for express services into Newcastle and park & ride facilities. near the interchanges.

If the Buchanan interchange is to be identified for growth, consultation should occur with Council to identify the type of growth and ensure Council's strategic plans align.

Tourism in the Vineyards

Council is generally supportive of the text and map relating to the Cessnock Vineyards District on pages 101 and 102 of the draft plan. Council supports the nine strategic directions on page 101 of the draft plan, particularly those which seek to ensure that non-agricultural development is appropriately sited and sympathetic to the rural context and that further small lot residential subdivision occurs outside the Vineyards District. Council also supports focusing on improving active transport infrastructure to and within the Cessnock Vineyards District.

References to the Vineyards District as a 'growth area' should be used with caution to avoid giving developers unrealistic expectations regarding development potential in the area, e.g. on page 101, which refers to the 'Viticulture Growth Area'. In addition, the visual sensitivity layer (included in Figure 22) is premature and should be removed from the map. Council is currently progressing a separate project to identify visually sensitive land in the LGA and the Draft Regional Plan should not pre-empt this work.

If you require any further information, please do not hesitate to contact Councils Principal Strategic Planner, Keren Brown on telephone 02 4993 4127 or email keren.brown@cessnock.nsw.gov.au.

Yours faithfully



From:

To:

DPE PSVC Hunter Mailbox

Cc:
Subject: Port of Newcastle Submission re Hunter Draft Regional Plan 2041

Date: Monday, 7 March 2022 4:42:34 PM

Attachments: image001.png

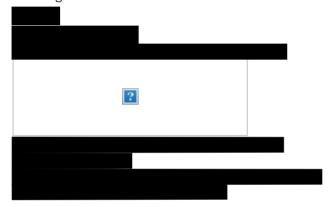
image001.png PON Submission on Draft Hunter Regional Plan 2041.pdf

Dear Team

Please find attached the Port of Newcastle Submission.

Thank you for the extension to lodge today.

Best regards





LEVEL 4, 251 WHARF ROAD NEWCASTLE NSW 2300 AUSTRALIA

+61 2 4908 8200

info@portofnewcastle.com.au portofnewcastle.com.au

4 March 2022

NSW Department of Planning and Environment PO Box 1226 NEWCASTLE NSW 2300

Sent by email: <u>hunter@planning.nsw.gov.au</u>

Dear Sir/Madam,

DRAFT HUNTER REGIONAL PLAN 2041 - SUBMISSION

Port of Newcastle (PON) appreciates the opportunity to provide this submission to the Department of Planning and Environment (Department) on the 'Draft Hunter Regional Plan 2041' (Draft HR Plan) which has been placed on public exhibition.

PON is the commercial manager of Newcastle Port and has a 98-year lease with the NSW Government, which commenced on 30 May 2014. A key objective of the lease is to maintain and enhance the Port as a major seaborne trade gateway for NSW. The shareholders of PON are The Infrastructure Fund and China Merchants Ports Holding Company Limited with each shareholder owning 50%. The shareholders in PON have a strong, global track record in managing large infrastructure assets including ports. The adopted mission of PON is to promote and support the prosperity of the Hunter Region and NSW in a sustainable manner.

Whilst generally supportive of the vision set out in the Draft HR Plan, PON is concerned that the draft underestimates the importance of the Port's development in achieving that vision. It is also concerned that the Draft HR Plan does not build upon the significant body of strategic planning associated with the Newcastle Port and appears to be given less significance than in earlier strategic planning documents.

To understand PON's concern it is necessary to revisit the significant role the Port has had in earlier strategic planning documents as described below.

HUNTER REGIONAL PLAN 2036

In 2016 the NSW Government published the 'Hunter Regional Plan 2036' (HR Plan). The Draft Plan involves an update to the HR Plan, which takes place about every 5 years.

The HR Plan identified and recognised the importance of the Port as a 'Global Gateway' and a key economic driver for the State and the region.

The HR Plan placed the importance of the Port (and airport) to the Region at:

- Direction 2: Enhance connections to the Asia-Pacific through global gateways (p19);
- Direction 4: Enhance inter-regional linkages to support economic growth (p21); and
- Direction 24: Protect the economic functions of employment land (p59).

Direction 2 from the HR Plan set out the following Actions (p20):

- Promote diversification of operations at the Port of Newcastle and the Newcastle Airport and enhanced connectively to the Asia-Pacific;
- Develop and review strategies and precinct plans for the global gateways and surrounding lands to support their growth, diversification and sustainability; and
- Prepare local plans that adequately respond to air, noise and other issues relevant to the gateways to protect their ongoing operations and expansion.

At p68 the Plan identifies, as a priority providing a buffer to PON's operations through appropriate zoning to safeguard its future. The Draft HR Plan may take these matters forward.

GREATER NEWCASTLE METROPOLITAN PLAN 2036

Building on the strategic direction set out in the in the HR Plan, the NSW Government issued the "Greater Newcastle Metropolitan Plan 2036' (Metropolitan Plan). The Metropolitan Plan is part of the "Strategic Planning Line of Sight" under the HR Plan as shown below (extracted from p5 of the Metropolitan Plan).



The Metropolitan Plan is described as helping to achieve the vision set in the HR Plan – "for the Hunter to be the leading regional economy in Australia with a vibrant new metropolitan city at its heart."

The significance of the Newcastle Port is identified in the Metropolitan Plan. The Newcastle Port is identified as a "Catalyst Area" (pg 52) and specific provision is made in the plan about the Port's future. Planning for the Port is detailed on pages 68 and 69, where it breaks the

Port and surrounding lands into various precincts and provides comments on current and potential future uses and a locality plan.

The Plan identifies the desired role of the Newcastle Port in Greater Newcastle as:

- Global gateway, providing international freight connections servicing Greater Newcastle and the Hunter Region;
- Emerging tourism gateway centred around the Newcastle Cruise Terminal; and
- Having capacity to generate port-associated industry and regional and local employment while
 planning for land use compatibility, acknowledging the high demands on land and infrastructure
 affecting surrounding lands and requiring a separation from adjoining land uses to sustain their
 success.

The Metropolitan Plan identifies particular precincts (see Figure 17 from the Metropolitan Plan reproduced below).

The Metropolitan Plan then discusses, in some detail, the desired outcomes for each of the identified precincts. The detail about the future of the port set out in the Metropolitan Plan has been used by PON in making its plans for the development of the Port and informed the Port of Newcastle 'Port Master Plan 2040' (PON Master Plan).



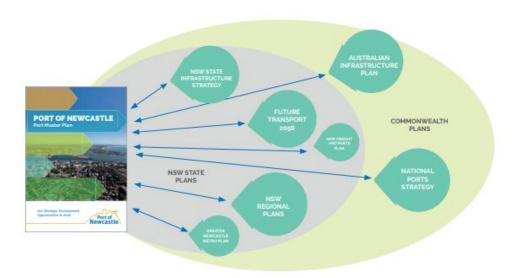
PORT OF NEWCASTLE PORT MASTER PLAN 2040

PON published its PON Master Plan and is available here https://www.portofnewcastle.com.au/wp-content/uploads/2019/10/Port-Master-Plan-2040-for-web.pdf. The PON Master Plan provides a broad and strategic approach identifying future development and opportunities, including:

- The Newcastle Container Terminal in Mayfield;
- The Newcastle Bulk Terminal in Walsh Point;
- A specialised Automotive and Ro-Ro Hub; and
- Supporting the Maritime Precinct in Carrington.

As is depicted in the following diagram, the PON Master Plan brings together a wide variety of relevant State and Commonwealth policies and strategies.

The PON Master Plan contains significant detail about Port Capacity, Transport Connectivity, Growing Trade, New Facilities and Infrastructure, and Protecting the Newcastle Port. It has considered a wide variety of strategic plans and policy statements and consolidated those plans into a comprehensive master plan. In PON's submission, facilitation of the development set out in the PON Master Plan is a key function of the Draft HR Plan.



SPECIFIC SUBMISSIONS ON THE DRAFT HR PLAN

Part I Making it happen (p16)

Part I focuses on achieving better coordination between infrastructure and development (infrastructure-first/place-based collaboration between developers and providers). As part of this approach (amongst other things):

- The Department has established the Hunter Urban Development Program Committee (p17) which will oversee a pipeline for employment and residential land supply, identify opportunities to accelerate the supply of land including improvements to rezoning, release and servicing (amongst other things); and
- Collaborate with councils to prepare place strategies for regionally significant places.

With 'place strategies', the trigger for employment lands is 200 ha or sites held by more than two landowners or identified in a plan as a catalyst site. Newcastle Port is listed in the table at p20 as a "Greater Newcastle Metropolitan Catalyst Area" and as a "Region shaping gateway and industry precinct". It is also listed in Appendix 3 of the Draft HR Plan.

It is unclear if a "place strategy" is required for the Newcastle Port. In PON's submission, rather than requiring a further Place Strategy for the Port, the Draft HR Plan should acknowledge the PON Master Plan as fulfilling that role and requiring future planning instruments (including amendments to State Environmental Planning Policy (Three Ports) 2013 (or any replacement)) should be generally consistent with the PON Master Plan.

While PON generally accepts that the organisations and agencies that are part of the UDP Committee are appropriate, it submits that it would be appropriate, in some circumstances, for PON to participate in that committee where the development and infrastructure being discussed is related to the Newcastle Port or the prioritisation of infrastructure with relevance to PON.

Otherwise, the PON generally supports the governance model identified on p20 of the Draft HR Plan.

Part 2 Objectives

Objective 1: Diversify the Hunter's mining, energy and industrial capacity (p22) and Objective 6: Reach net zero and increase resilience and sustainable infrastructure (p50).

The Draft HR Plan recognises a reduction in the coal sector and the need to transition into other industries (e.g. green energy, circular economy, reuse of former mine sites and buffers). There is, however, no reference in the Draft HR Plan to desired future uses for coal related land within the Port precinct.

The Draft Plan also does not pay sufficient attention to work that has been done about opportunities for green energy initiatives like the kind set out in documents such as the 'Hunter Hydrogen Roadmap [2021 – 2040]' (Roadmap) which has been produced by the Hunter Hydrogen Taskforce of which PON is a key member. A copy is available here https://dantia.com.au/wp-content/uploads/2021/11/20211110-Hunter-Hydrogen-Roadmap-WEB.pdf)

The Draft HR Plan should facilitate and encourage the Hunter's Hydrogen Future set out in the Roadmap and identify the Port's key role in delivering it.

Otherwise PON is supportive of the initiative to achieve Objectives I and 6.

Objective 8: Build an inter-connected and globally focused Hunter (p58)

Objective 8 discusses the importance of the Lower Hunter Freight Corridor, MI Extension, and the NSW Fast Rail Network Strategy. The Draft HR Plan states at p58 that "Newcastle Airport and the Port of Newcastle enhance the Hunter's global reach, particularly through new jobs and associated growth areas from the expansion and diversification of operations".

The Draft HR Plan, at p59, identifies a strategy that:

Any aviation and port related development proposals should:

- Align with the growth of defence, aeronautics and aerospace-related industries at Williamtown.
- Increase capacity to manage freight through the Port of Newcastle.

The Draft HR Plan goes on to say:

Development proposals for new consolidation and distribution facilities must not cause unacceptable impacts on the long-term capacity of strategic inter-regional connections to meet future freight and logistics movements.

PON is concerned that the above objectives too narrowly look at the potential of the Newcastle Port and may be construed as limiting the development opportunities around the Port. While creating a "global gateway" and "inter-regional linkages" will assist the Newcastle Port to achieve its potential, the Draft HR Plan should be more expansive and ambitious and adopt and facilitate the ambitions for the Newcastle Port set out in the PON Master Plan and the Roadmap.

The Draft HR Plan should also set out what documents will be used to establish capacity such as the '2021 Hunter Valley Corridor Capacity Strategy' prepared by ARTC.

Further, the Draft HR Plan should prioritise maintaining existing road and rail access points to the Port as without this capacity the Port's current operations and scope to accept increased trade is constrained. These access points need specific consideration in proposed urban expansion in port areas. Similar consideration is appropriate for maintaining existing roads for freight between the Port and Newcastle Airport.

Part 3 District Planning and Growth Areas

Part 3 of Draft HR Plan dealing with "District Planning and Growth Areas" should be amended to incorporate a specific section on the Newcastle Port and pick up the strategic planning that has taken place in the Metropolitan Plan and the Master Plan.

Part 3 should emphasise:

- Newcastle Port's importance to the state and regional economy;
- The opportunity for diversification of trade and land uses including opportunities in logistics, manufacturing and green energy;
- The ability of the Newcastle Port to make available employment lands within proximity to the workforce which would reinforce the 15-minute city objective; and
- The realisation of the approved Multipurpose Terminal with an emphasis on container handling.

As set out above, Part 3 of the Draft HR Plan should acknowledge the evolution of the strategic planning that has taken place of relevance to the Newcastle Port and acknowledge and support the implementation of the Master Plan.

Other General Comments

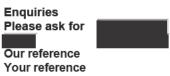
More broadly PON submits that the HR Draft Plan does not indicate (or does not sufficiently indicate) how it connects with other economic plans for the Hunter (for example - plans prepared by Regional Development Australia and the Centre for Economic & Regional Development). Given the Region's economy has been identified as one which will undergo significant transition in the future, it is submitted that greater consideration, alignment and collaboration with development agencies and plans should be included.

PON also submits that greater recognition of Indigenous participation in the planning/development process should be included in the Draft HR Plan.

Thank you for the opportunity to make a submission. Should you wish to discuss this matter further, please contact







7 March 2022

Department of Planning

Dear Sir or Madam,

Submission on draft Hunter Regional Plan 2041

Thank you for the opportunity to prepare a submission on the Draft Hunter Regional Plan 2041. Council resolved on 1 March 2022 to make a submission as flows:

Urban Development Program

Regular monitoring of land supply, dwelling production and demand will enable better decisions on urban renewal priorities, release of land for development and the infrastructure and servicing required to enable delivery.

A Hunter urban development program committee will be established. The committee will:

- identify and remove barriers and disincentives for infill housing;
- oversee a pipeline of housing and employment land supply across the Hunter;
- track the supply of infill and greenfield land supply, completions, and infrastructure servicing data of housing and employment land;
- identify opportunities to accelerate the supply of land for housing and employment including improvements to land rezoning, release and servicing;
- make land use and infrastructure sequencing recommendations that may result in more cost-effective housing and job delivery;
- provide annual updates on the implementation of the regional plan; and
- provide annual updates to a sequencing plan and delivery report.

A sequencing and delivery report will be prepared to include:

- evaluation of investigation areas against the criteria;
- Hunter-wide sequencing priorities covering all place strategies;
- roles and responsibilities for place strategies; and
- · resourcing, collaboration and funding agreements.

Comment

Muswellbrook Shire Council supports this initiative. A template for monitoring land availability should be created by DPIE and financial assistance provided to councils to:

- develop mechanisms to readily report on key parameters; and
- develop place strategies without undue increases in demand on council resources.

Objective 1 – Diversify the Hunter's Mining, energy and industrial capacity

The Plan highlights a shift in the government's approach to post-mining land use considerations. Rather than returning land to its pre-mining state, or as agricultural or biodiversity land, the Plan states there may be opportunities to utilise mining infrastructure to leave an economic legacy for the community, with opportunities for future investors to develop the land post-relinquishment.

The department will investigate site compatibility mechanisms to allow development applications to be lodged for non-permissible uses and associated subdivision for the areas of interest parts of mine sites consistent with the Hunter Regional Plan. This will also consider mechanisms to provide more flexibility in post mining land uses as part of the development consent process.

Managing industrial capacity and creating flexible planning and development controls will need to respond to new opportunities and technologies, including catalytic investments and transition to net zero emissions. This may mean a shift from traditional industrial and manufacturing into advanced and smart manufacturing, artificial intelligence and robotics, or more distributed manufacturing. E-commerce is increasing demand for warehouse and logistic properties to accommodate automated warehousing.

Comment

Muswellbrook Shire Council supports the need for diversification of employment opportunities.

Objective 2: Ensure economic self-determination for Aboriginal communities

The NSW Government is committed to improving the economic self-determination of Aboriginal communities in NSW. The principles of self-determination and co-design can be implemented across the region so that Aboriginal people have greater choice, access and agency over land, water, housing and resources.

Comment

Muswellbrook Shire Council supports this objective and strategies.

Objective 3: Create a 15 minute region made up of mixed, multi-modal, inclusive and vibrant local community

Objective 4: Plan for "Nimble Neighbourhoods", diverse housing and sequenced development

For many decades, growth in the Hunter has assumed that we would use our cars to meet most of our needs, often involving travelling long distances to do so. We've designed growth, both in land use, urban design and transport infrastructure, in a way that has made personal vehicle use the most attractive choice, and indeed often the only realistic choice.

There are two scales of access:

- Local neighbourhood scale where most everyday needs are accessible within 15 minutes by walking or cycling. In rural contexts it is recognised that the reasonable, and yet still ambitious goal, is for some local needs to be accessible within short walks or bike-rides, but that the majority of such needs should be accessible within a 15-minute personal vehicle drive.
- The second scale recognises that many more infrequent and specialised needs and goods would not typically be expected to be reachable by all residents in such a local way, but should still be accessible relatively easily without being dependent on a car. This

second scale, the 30-minute connected community scale, allows for reasonably easy travel across communities and differing contexts by walking, cycling or public transport to less frequent, more specialised needs within 30-minutes.

Development proposals will need to demonstrate how various employment, commercial, community, recreation and education services will be located within 15-minute walking (urban contexts) and cycling (suburban contexts) trips of housing in residential and mixed-use zones, with achieved densities that allow for such local uses to succeed and flourish.

Rural towns and villages provide a unique lifestyle choice. While these areas are not intended to accommodate significant growth, councils may undertake planning to ensure they can grow sustainably, be resilient, and respond to change.

Urban densities in new and existing neighbourhoods will represent an optimum, not a minimum, net density necessary for the following outcomes:

- · increase housing choice and affordability;
- successfully achieve and support the level of local mix of uses and services being sought;
- · achieve and support attractive walking, cycling and public transport;
- achieve and support the highly efficient use of land and infrastructure that are necessary to achieve a 15-minute region;
- assist the region in achieving net zero; and
- · improve the health and wellbeing of Hunter residents, workers, and visitors.

Comment

Muswellbrook Shire Council supports the general objectives but are concerned by some of the strategies. They may work well in the coastal locations of the Region, but the reason many people choose to live in the Upper Hunter is in part to be able to purchase a larger house lot. The current ratio of infill (5%) to greenfield (95%) will be difficult to change to 40%: 60%.

New housing needs to consider issues arising from the current and future climates. Summer temperatures in the Muswellbrook are already substantially higher than coastal location. Poorly designed, smaller lot subdivisions, where the road, roof and other hard surfaces dominate over lawn and treed areas have the potential to increase urban heat effects.

The increase in rainfall falling in storms also requires careful consideration of WSUD.

Council is already planning to introduce the use of an R2 Residential rather than the blanket R1 General Residential zone currently in place in MLEP 2009. The R1 will be used in locations closer to the Town Centre, train station, main roads and Rutherford Road shops as an indication of locations where small dwellings and higher density is preferred.

Objective 5: Increase green infrastructure and quality public spaces and improve the natural environment

The Hunter's waterways, national parks, protected areas and World Heritage wilderness areas all contribute to healthy lifestyles, liveability and economic prosperity.

These areas need to be made more resilient to climate change, bushfire, urban edge effects and weed and pest infestation. They need to be reconnected to allow plant and animal species to move among communities and migrate in response to changing climatic conditions. Investing in conservation (including biodiversity offsets) that protects, and where possible, enhances habitat connections will benefit the environment and the community.

Any extensions to growth areas should be designed to connect to the established open space network or planned in a place strategy including extensions to walking and cycling routes.

Councils should seek to incorporate goals to increase the urban forest when preparing place strategies or other place-based planning so that targets will be met in local neighbourhoods. This will also help address urban heat risks reduce the impact of increasing heat waves.

Upper Hunter Valley Link

This link contains important valley floor forest and woodland remnants and covers the only viable north–south corridor across the Upper Hunter. The aim of conservation planning will be to connect, protect and enhance the large patches of existing vegetation between Wollemi National Park, Manobalai Nature Reserve and the Liverpool Range. It will be achieved through private land incentive programs and other mechanisms such as biodiversity offsetting.

Comment

Muswellbrook Shire Council supports this objective and strategies.

Objective 6: Reach net zero and increase resilience and sustainable infrastructure

The NSW Climate Change Policy Framework commits NSW to achieving net zero emissions by 2050. To successfully achieve this goal, the state's objective is to deliver a 50 per cent cut in emissions by 2030 compared to 2005 levels. This will help ensure significant progress is continual and achievable.

To progress successfully towards a net zero emissions Hunter, the regional plan seeks to make climate change a guiding principle for all planning decisions.

Councils are expected to engage the community to understand place-based risks (shocks and stresses), vulnerabilities and capabilities and provide information to develop resilience and adaptation plans. To assist councils in natural hazard management and risk mitigation the NSW Government has prepared *Planning for Bushfire Protection Guideline 2019, NSW Coastal Management Framework, Floodplain Risk Management Program and a draft Planning for a more resilient NSW.* These policies and guidelines ensure sensitive land uses and infrastructure such as homes, hospitals and schools are appropriately located, so communities are not placed at high risk, and people can safely evacuate if there is an emergency.

Comment

Muswellbrook Shire Council supports this objective and strategies.

Objective 7: Plan for businesses and services at the heart of healthy, prosperous and innovative communities

The diversity and vitality of the Hunter's towns and centres will need to respond to economic trends, technological advances, consumer behaviours and the development of the 24-hour economy.

The Hunter has the potential to be recognised as a world-class location for sustainable and nature-based and cultural tourism. Existing infrastructure, access, proximity to global gateways combined with the environmental and cultural values, including Aboriginal heritage, can be significant drawcards for domestic and international visitors.

Comment

Muswellbrook Shire Council supports this objective and strategies.

Objective 8: Build an inter-connected and globally focused Hunter

The Hunter has strong links to the surrounding regions of the New England Northwest, North Coast, Central West and Orana, and Central Coast, with people and freight moving between these regions every day.

The Hunter has different communities, assets and features, that while individually unique, effectively function as a connected and collective whole that together underpin our identity and lifestyles. Connectivity plays an important role in linking this diversity together and opening up opportunities to leverage a global economy and visitor market.

Comment

Muswellbrook Shire Council supports this objective and strategies.

Muswellbrook Shire provides opportunities for warehousing and distribution given the rail and road connections and large tracts of land currently held for mining operations and power stations. Completing the rail connection to Dubbo would allow links the inland rail corridor.

Central Hunter

The regional plan divides the Hunter into six districts that are considered to share similar characteristics, such as economy and infrastructure, geography and settlement patterns, housing markets, community expectation and levels of self-containment.

The district-based approach is used to:

- identify planning priorities that build on and provide direction to the regional plan vision and objectives;
- identify regionally significant growth areas and actions for achieving the regional plan objectives;
- guide the application, weighting and prioritisation of state interests set out in planning mechanisms; and
- inform other plans and programs, including local strategic planning statements and local plans and place strategies, to prioritise and coordinate the planning and provision of infrastructure and services.

The Central Hunter is a new district is anchored by the Muswellbrook and Singleton townships. The Central Hunter is considered to be the industry and innovation centre of the Hunter. It has globally acknowledged mining, equine and viticulture sectors and offers a rural lifestyle connected to metropolitan cities. The diverse landscape sustains heavy industry, agriculture, tourism and biodiversity.

It is separated from to the Upper Hunter, which is distinguished by a quality rural lifestyle in a vibrant, caring and sustainable community. Rural industries represent the predominant land uses and help drive the Upper Hunter's economic performance. Key sectors include primary production (beef cattle), horse farming (equine), mining, meat processing and local government administration.

Several mines in the Central Hunter district are scheduled to cease mining and commence closure shortly, as are the Liddell and Bayswater Power Stations. Other coal mines are considering commencement or expansion. Both scenarios present opportunities to enable alternative post-mining land uses.

Opportunities to co-locate other employment generating activities on the Liddell site are being explored. The site is in single ownership, has both rail and highway access, as well as significant

land, water and infrastructure assets. This makes it well suited to facilitate investment in jobs, particularly in the manufacturing, waste, freight, hydrogen, data and agribusiness sectors.

The Plan nominates the Liddell site as a regionally significant growth area with a plan showing future land uses across the combined site. The site is expected to be progressed as a Place Delivery Group pathway.

Considering visual amenity more generally, the landscape values of lands adjoining major road approaches to Singleton, Muswellbrook and surrounding villages and the vineyard region will be managed to provide a rural experience, potential wildlife corridors and a barrier to movement of airborne particulate matter.

Comment

The separation of Singleton and Muswellbrook from the Upper Hunter into the Central Hunter subregion is not supported. There is not sufficient justification to support disruption of the branding, marketing, place making and general awareness that already exists. A number of non-government organisations utilise the Upper Hunter terminology when talking about Muswellbrook and Singleton.

The characteristics of the three LGAs are more similar then different, and while the Upper Hunter does not contain an active mine, many residents from the Upper Hunter work in mines or the power stations. The wellbeing of residents and economy of the Upper Hunter will be affected by the future transitions.

Cattle grazing, dairy farming and fodder production is a strong theme in all 3 LGAs. Merriwa has close ties with Sandy Hollow and Muswellbrook and the Golden Hwy is an important corridor to the West and other coal mining communities. Some of the Horse Studs have properties in both subregions, with stallions in one sub-region and mares/foals in another.

The Liddell and Bayswater Significant Growth Area land use plan included in the draft Hunter Regional Plan should not be "locked in". The studies that have occurred to generate this land use plan are not available to the public, and there hasn't been a consultation program with Council, government agencies or the broader community. Council wants to be involved in the place delivery group pathway for this site.

The proposal to carefully manage the landscape values of the rural areas of Muswellbrook Shire are supported.

If you have any enquiries, please contact me on
Regards

From:

To: DPE PSVC Hunter Mailbox

Subject: Muswellbrook Shire Council submission on Draft Hunter Regional Plan

Date: Monday, 7 March 2022 4:59:05 PM

Attachments: image001.png

Muswellbrook Shire submission - draft Hunter Regional Plan 2022 - 20220301.pdf

Hello

Council resolved on 1 March 2022 to make a submission to the draft Hunter Regional Plan 2041. A copy of the submission is attached.

Regards



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Muswellbrook Shire Council ABN 86 864 180 944



Our Ref: WL/00/000

4 March 2022

Mr. Ben Holmes NSW Department of Planning, Industry and Environment Locked Bag 5022 PARRAMATTA NSW 2124

Electronic Lodgement: <planningportal.nsw.gov.au/draft-hunter-regional-plan-2041

Dear Mr. Holmes,

Re: Submission to the Draft Hunter Regional Plan 2041 – Other Holdings

I write to provide a submission to the Draft Hunter Regional Plan 2041 (the draft Plan).

This submission has been prepared by the McCloy Group, who is a family-owned, Hunter based property group, who is currently staging the construction of more than 6,200 residential homesites across the Hunter, Central Coast, New England, and Northern Rivers regions of NSW.

The McCloy Group has prepared a separate submission for land at Wallalong. This submission is focused on land at Forster South, Thornton North, Lochinvar, Kings Hill, Medowie, and Kurri Kurri.

Summary

To assist the McCloy Group to continue with the delivery of housing, we would please request that the post-exhibition version of the Plan includes the following:

- 1. Continued identification of the land collectively known as Forster South/Bert's Farm as a Proposed Urban Release Area (p.116),
- 2. Continued identification of 107 Haussman Drive, Thornton (Lot 2, DP 1145348) as 'Hunter ÚDP' (p.72), but that the draft Plan be updated to define HDP in the Glossary (p.124),
- 3. Identification of land to the immediate west of the existing Lochinvar Urban Release Area as a 'Potential Growth Area', not 'HEX interchange growth area' (p.70),
- 4. Continued identification of the Kings Hills URA as 'Hunter ÚDP' (p.72), but that the draft Plan be updated to define HDP in the Glossary (p.124),



- 5. Identification of land mapped as 'Residential' in the Medowie Strategy (p.9) as 'Hunter UDP' or 'Proposed URA' in the Draft Plan (p.65), and
- 6. Land in the Maitland Local Government Area at Regrowth -Kurri Kurri (364 Cessnock Rd) be amended from 'General Residential' to 'Residential zone (undeveloped)' (p.70).

The remainder of this submission provides the justification for the above recommendations.

Forster South

The McCloy Group supports the identification of the following land at Forster, which is identified 'Proposed Urban Release Area' (p.116) under the Draft Plan:

- Lots 1 to 7, DP 249361,
- Lot 1, DP 1229374, and
- Lot 50, DP 753168.

The identification of this land is consistent with the following land-use strategies:

TABLE 1 – Identification of Forster South in consecutive land-use strategies

No	Strategy	Comment
1	Mid-Coast Council, July 2021, Mid- Coast Urban Release Areas Report	The site is identified in this Report as an URA in the medium term 6-10 years (p.47)
2	Mid-Coast Council, December 2020, 'Mid-Coast Housing Strategy'	The site is identified in this Strategy as Potential Residential Land (p.31).
3	NSW Department of Planning, Industry and Environment, 2018, 'Hunter Regional Plan'.	The site is not specifically identified because the Plan only maps current URAs and Gateway Determination sites (p.52). However, Action 21.1 states: 'Focus development to create compact settlements in locations with established services and infrastructure, includingin existing towns and villages and sites identified in an endorsed regional or local strategy' (p.54). The wording 'endorsed regional or local strategy' was intended to capture the remainder of the Mid-



		Coast Regional Strategy 2006, which was identified as a 'Proposed Urban Release Area'.
4	NSW Department of Planning, 2006, 'Mid-Coast Regional Strategy'.	The Strategy identifies the site as a Proposed Urban Release Area (p.58).
5	Great Lakes Council, 2006, 'South Coast Structure Plan'.	The Plan identifies the site as a mixture of residential environmental and tourism uses (p.123).

The McCloy Group is currently preparing a planning proposal and separate development application to achieve a residential outcome on the site, so the continued identification of this site as having potential for residential development will assist with demonstrating 'strategic merit'.

Thornton North

The McCloy Group supports the identification of 107 Haussman Drive, Thornton, NSW, 2322 (Lot 2, DP 1145348) as 'Hunter ÚDP' (p.72) under the Draft Plan.

The McCloy Group would please request that 'Hunter UDP' be defined in the Glossary to provide further clarity to the significance of this identification. Our understanding is that its identification as 'Hunter UDP' makes it suitable to be developed for residential development because the site has been consistently identified for residential development in the following strategies:

TABLE 2 – Identification of Thornton North in consecutive land-use strategies

No	Strategy	Comment
1	Maitland City Council, 2020, 'Maitland Local Strategic Planning Statement'	The Statement identifies the site as Planning Investigation – Residential (p.25).
2	NSW Department of Planning, Industry and Environment, 2019, 'Greater Newcastle Metropolitan Plan'	The site is specifically identified as a Current Urban Release Area (p.52).
3	NSW Department of Planning, Industry and Environment, 2018, 'Hunter Regional Plan'.	The site is specifically identified as a current URA because it is already mapped as part of the Thornton North Stage 1 URA under the Maitland Local Environmental Plan 2011 (p.52).



4	Maitland City Council, 2012,	The Strategy identifies the site as Thornton North
	'Maitland Urban Settlement	Stage 3, and rates it as Category 1 Residential
	Strategy'	Land, flagged for within 1-5 years (by 2017) (p.75)
5	Maitland City Council, 2011,	The DCP recognises the site as a residential area,
	'Maitland Development Control	with a strip of land identified for vegetation
	Plan'	conservation along the southern boundary (p.78).
6	NSW Department of Planning,	The Strategy identifies the locality as a Proposed
	2006, 'Lower Hunter Regional	Urban Area with boundaries to be defined through
	Strategy'.	local planning (p.12).
7	Parsons Brinkerhoff, 2003,	The Masterplan identifies the site for future
	'Thornton North Master Plan'	residential development, following the
		decommissioning of clay mining on the site (p.5).

A planning proposal is currently under assessment by Maitland Council for this site. The proposal was reported to Council on 8 February 2022 with the aim to seek a gateway determination from the State Government. The continued identification of this site as having potential for residential development will assist with demonstrating 'strategic merit'.

Lochinvar

The McCloy Group does not support the identification of HEX interchange growth area that extends to the western boundary of the existing Lochinvar URA under the Draft Plan (p.70). It also does not support the following statement:

'Prohibit rezoning for residential or rural residential development, other than land in a current proposal or future endorsed local strategy' (p.71)

The land to the west of this boundary is the logical extension of this existing residential URA. Consistent with other locations identified in the Draft Plan for future investigation, this land to the immediate west may be most appropriately identified as a 'Potential Future Growth Area'. This identification would then enable Council to nominate this locality under Appendix C: Infrastructure fire and place-based delivery of the Draft Plan for a Place Strategy.

The New England Highway Corridor has long been recognised as a regional planning priority, which is illustrated by the NSW Government's \$11.5M investment to upgrade the Wyndella Road intersection. The identification of land to the west of the existing Lochinvar URA as a 'Potential Growth Area' would allow resources to be focused on the continued long-term planning for the regional priority of Lochinvar as an ongoing URA.



The McCloy Group is currently preparing a Development Application for lands adjoining the western boundary of Station Lane, so further certainty about the future of those lands to the west of the Lochinvar URA would lead to a more informed subdivision layout.

Kings Hill

The McCloy Group supports the identification of the Kings Hill URA as 'Hunter UDP' under the Draft Plan (p.64). However, it is unclear why lands on the western side of Newline Road are mapped as 'Hunter UDP' when the URA is limited to the eastern side of Newline Road.

The McCloy Group would please request that 'Hunter UDP' be defined in the Glossary to provide further clarity to the significance of this identification. Our understanding is that its identification as 'Hunter UDP' makes it suitable to be developed for residential development because the site has been identified for residential development since the Lower Hunter Regional Strategy 2006.

The McCloy Group currently has a Development Application for residential subdivision for lands within the Kings Hill URA, which are legally identified as:

- Lot 32, DP 554875,
- Lot 2, DP 37430,
- Lot 9, DP 111433,
- Lot 32, DP 586245, and
- Lot 8, DP 111433

The identification of the Kings Hill URA will assist in achieving a residential outcome at Kings Hill.

Medowie

The McCloy Group supports the identification of Medowie as a 'Priority Location for future housing' but believes land identified in the Medowie Strategy as 'Residential' (p.9) must be mapped as 'Hunter UDP' or 'Proposed URA' in the Draft Plan (p.65).

This approach would be consistent with the Draft Plan identifying sites within the Mid-Coast Local Government Area as 'Proposed URAs' (p.116). The locations identified as 'Proposed URAs' are reflective of the Mid-Coast Urban Release Areas Report that was adopted by Council in August 2021. At the same time, Port Stephens Council has multiple Local Strategies that have also been adopted by Council (e.g., Medowie Strategy) that identifies future residential to the lot boundaries.



Neither the Mid-Coast Urban Release Areas Report, nor the Medowie Strategy has been endorsed by the NSW Government and therefore both these Council Strategies have the same status.

The McCloy Group is currently preparing a planning proposal for land identified in the Medowie Strategy as residential, so further certainty would be provided if this land was also identified in the Draft Hunter Regional Plan to the lot boundaries.

Regrowth – Kurri Kurri

The McCloy Group supports the identification of Regrowth- Kurri Kurri as 'Proposed residential' and 'Proposed general residential', however, it is requested that the land located in the Maitland Local Government Area be changed to 'Residential zone (undeveloped)' (p.70).

This requested change is based on the land identified as 'Proposed General residential' being supported by Maitland Council on 8 February 2022 following the public exhibition period and so this land is likely to be gazetted by the time the Regional Plan is endorsed by the Minister.

The McCloy Group currently has a Development Application lodged with Maitland Council for the first 342 residential lots of Regrowth- Kurri Kurri and is continuing to work with Cessnock Council to finalise the planning proposal for remaining residential, industrial, and business lands.

Please contact me on should you have any questions and/or an opportunity exists to discuss these matters further in person.



From:
To: DPE PSVC Hunter Mailbox
Cc:

Subject: Submissions to the Draft Hunter Regional Plan 2041.

Date: Friday, 4 March 2022 3:48:35 PM

Attachments: image001.png image002.png

image003.png image004.png image005.png Website Down.PNG

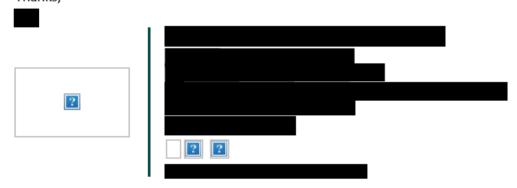
Good afternoon,

I have been trying to upload our two submissions to the planning portal, but the website keeps crashing, which may be due to their size. See attached.

In turn, I just wanted to send them to you to be sure that the Hunter Office receives them. They are available via the following links:



Please let me know if you have any questions or require further information. Thanks,







Ref: 1150

The Department of Planning and Environment PO Box 1226 NEWCASTLE NSW 2300

Email: <u>hunter@planning.nsw.gov.au</u>

Dear Sir / Madam,

RE: Submission on behalf of Hume Housing - Draft Hunter Regional Plan 2041

This submission has been prepared on behalf of Hume Community Housing, a 'not for profit' organisation which provides homes and services to more than 9,000 residents in NSW who reside in its 4.200 dwellings. In the Hunter Region, Hume Community Housing (Hume) manages over 2128 properties, primarily in the Maitland and Port Stephens LGA.

As the Department of Planning and Environment (DPE) is aware, housing affordability is a matter which requires a whole of government response, with the underlying factors affecting affordability becoming more prevalent across Regional NSW, including the Hunter Region. Hume, as a provider and manager of a range of social and affordable housing, is at the coal face of the lived experience for those feeling housing pressure in the Hunter Region and encourages any measures by government which will assist in meeting the needs of those under housing stress.

It is therefore imperative that planning strategies such as the Draft Hunter Regional Plan 2041 give adequate weight direction and implementation mechanisms to ensure social and affordable housing becomes ingrained in the framework for planning decisions for the next 30 years and beyond.

This submission seeks to acknowledge the directions given in the Draft Hunter Regional Plan 2041 whilst suggesting further measures which would ensure the Plan more closely aligns with the NSW Housing Strategy and the recent findings of the Regional Housing Task Force. Additionally, this submission seeks to reinforce the importance of organisations such as Hume within the region a key stakeholder, not only in terms of its ongoing management of existing housing stock, but the opportunity to replenish and redevelop assets under its control, contributing to housing diversity.

1. Summary Findings and Recommendations

Hume Community Housing supports the overarching objectives of the Draft Hunter Regional Plan 2041 and the recognition given to the need for social and affordable housing in the region. While this narrative in the Plan is commendable, the Plan is short of mechanisms, targets and directions to ensure the objectives translate to additional social and affordable housing in the region. At the heart of this, the Plan does not appear to acknowledge the extent of the shortage and where the shortfalls are most pronounced. Such evidence must be embedded in the Plan to give context and ensure the importance of this critical issue is not watered down or 'lost' when developing local plans and strategies and local planning decisions. Provided below, are recommendations which, if adopted, would contribute better recognition of social and affordable housing shortages in the region and mechanisms to improve supply.



Recommendations

- Social and affordable housing should be recognised as infrastructure, which needs to be coordinated in the same way as other essential infrastructure;
- The plan refers to multi-criteria analysis to establish the sequence for undertaking place strategies and the preparation of an annual sequencing and delivery report. The final plan should include further detail on the weighting and prioritisation, with provision of social and affordable housing appropriately recognised and 'weighted'. We recommend this align with targets for delivery of social and affordable housing regionally and in each LGA;
- Place Strategies should be developed with mandated targets and mechanisms for the delivery of social and affordable housing;
- Mandated targets should be developed based on evidence and data sets developed through collaboration between DPE and key stakeholders such as CHPs and LAHC;
- Place Delivery Groups established to oversee the development of place strategies should include a range of stakeholders, including representatives from CHPs.
- There should recognition that the government holds a significant level of obsolete public housing in the region that ideally should be replaced with more appropriate social and affordable housing dwellings and dispersed with private housing dwellings.
- In addition to key state government agencies, the Hunter Urban Development Program Committee should include representatives from LAHC and key CHP's in the region to ensure that opportunities to deliver social and affordable housing through identifying roadblocks and barriers are addressed

2. Hume Community Housing

2.1. Overview

Hume Community Housing provides safe, secure and sustainable housing to a diverse customer base through delivery of a range of programs to offer social and affordable housing, specialist disability accommodation, seniors housing and youth housing. Hume's capabilities extend to building new properties, managing tenancies for a range of public and private landowners and in conjunction with key partners providing a range of services and support.

Of particular relevance to the Hunter Region, in 2018, Hume was successful in securing a social housing management transfer (SHMT) of over 2100 properties, and in 2019 commenced the provision of tenancy and property management, and tailored support services, via a 20 year Program Level Agreement with the Department and Communities and Justice and the NSW Land and Housing Corporation. Since the commencement of Agreement Hume, Hume has become acutely aware of the tenancy and social issues of its customers and the dwellings that they reside in. To that end Hume has spent approximately \$16M on maintenance on its Hunter portfolio, including \$7.1M on planned dwelling amenity upgrades on 121 dwellings.

Hume has also developed a range of social and affordable housing, and in 2019 partnered with Frasers Property Australia, Land and Housing Corporation (LAHC) and Parramatta Council to assist transform a 13 hectare site (**Figure 1**), and 450 social housing dwellings, as part of a master planned urban renewal program. This master planned neighbourhood will deliver approximately 4,500 homes with a target of 741 new fit for purpose affordable and social housing developments. For this project, the importance of partnering with specialist community housing providers was recognised as being "essential to extract the benefits of combining agile capital with place – making capabilities to build a balance and resilient sense of belonging for residents".



Figure 1 - Telopea Master Plan (source Urbis 2017)





2.2. Hume Housing – Hunter Region

In the Hunter Region, Hume manage 2128 properties, concentrated in the Maitland and Port Stephens LGA's. **Figure 2** provides an overview of the number of properties in each LGA by suburb, while **Figure 3** shows the geographic locations on a regional scale.

Figure 2 - Properties by Suburb and LGA

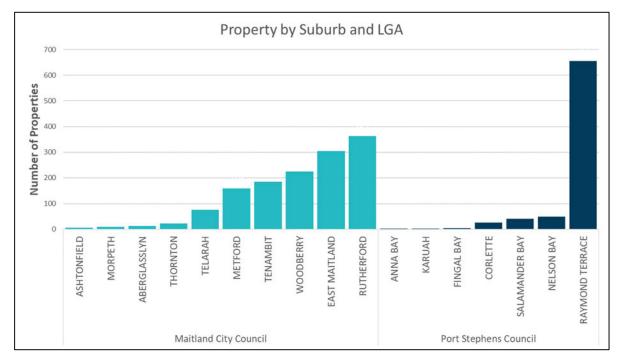
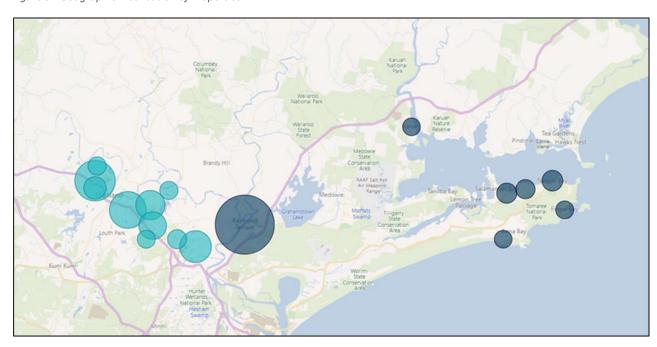


Figure 3 - Geographic Distribution of Properties



The portfolio is predominantly detached housing (72%) on Torrens title allotments, with the remaining 28% comprising units, townhouses and villas. Approximately 60% of the portfolio is over 45 years in age. In terms of asset management, a significant percentage of the portfolio has deteriorated over its life time, leading to



significant maintenance issues including structural deterioration, roofing, guttering, subsidence, termite damage and poor amenity (painting, flooring, kitchens, windows, fencing and bathrooms). Importantly, much of the housing stock has been poorly designed, offering limited liveability, minimal thermal comfort, cross ventilation and accessibility. A majority of the housing is not suited to an aging population or those with disabilities, and increasing proportion of Hume's customers. Hume's Asset Management Plan indicates that an investment of \$80M over the next 18 years is required to address back log maintenance and poor amenity to bring the dwellings to an adequate standard. Note that despite this level of investment, the dwellings would not meet contemporary expectations in regard to the provision of quality social and affordable housing due to the inherent build form, design and typologies. Hume's analysis has indicated that a capital improvement program directed at these dwellings, would represent over capitalisation as a significant proportion of the dwellings represent only land value (i.e the dwellings do not add value to the land on which they are situated).

While these properties will continue to be maintained, as funding permits, and upgraded to somewhat improve amenity and aesthetics for the current cohort, this does not go towards addressing the fundamental shortage of stable social and affordable housing in the Hunter Region.

Importantly, a significant proportion of the estate is situated in localities which have good access to services (education, employment, medical) and public transport. This includes localities such as:

- Telarah;
- East Maitland;
- Metford; and
- Raymond Terrace

It is without question that such localities of highly concentrated social housing would benefit from urban renewal / place making in a similar manner to Telopea which would improve housing diversity, allow for better integration with private housing stock, replace housing that no longer meet the needs of social housing customers nor their contemporary expectations, and provide improved quality of social and affordable housing is an area of mixed housing tenures. Further to this ,and importantly, increase the number of social and affordable housing in a locality.

In the Hunter Region, Hume have experienced a significant increase in demand for housing from people experiencing homelessness and an inability to find housing in the private market. Many social housing applicants are in temporary housing as they cannot access suitable accommodation. Due to unprecedented vacancy rates in the private rental market (< 1% in the Hunter Region), Hume have experienced a significant increase in demand for housing options from people experiencing homelessness and an inability to find housing in the private rental market. Many social housing applicants are housed on a temporary basis in substandard accommodation in caravan parks and cheap hotels which often translates to extended periods of 3-6 months. Alternatively, many applicants reside with family relatives or friends on a stop gap, make-shift unsuitable and over-crowded living arrangement. Many are families sharing one room. Clearly, there is a significant issue in that there is not enough suitable stable social and affordable housing, and a high proportion of what is available is reaching the end of its serviceable life. This experience has been echoed by other CHP's such as Compass Housing. In total there are 5,426 dwellings managed by CHP's in the region.

To give context, the below provides a brief snap shot of the current (June 2021) state of play in the Region:

Current Social Housing Wait List

○ Raymond Terrace: 5 – 10 year wait for 1 – 4 bedroom dwelling;

154 on registered wait list

Nelson Bay: 5 – 10 year wait for 1 and 4 bedroom dwellings;

10 + years for 2 - 3 bedroom properties;

156 on registered wait list

 \circ Maitland Region 5 – 10 year wait for 1,2 and 4 bedroom dwelling

10 + year wait on 3 bedroom property

717 on registered wait list

Affordability

 Utilising 45% of income to rent, a single person on Centrelink can only afford \$200/week rent. A single mother can only afford \$332/week



- o In 2022 (Q1) average rents in Maitland LGA are \$469 for a house and \$327 for a unit.
- o In 2022 (Q1) average rents in Port Stephens LGA are \$512 for a house and \$397 for a unit

This snap shot shows that within two local government areas alone, the shortfall is at 1027 dwellings with minimum wait times of 5 years. Beyond Maitland and Port Stephens, the Newcastle Local Housing Strategy (2020) notes that there are currently 132 social and affordable housing units in the pipeline, this falls substantially short of the assumed underlying demand of 7,000 – 7500 units.

Whilst, as noted in the NSW Housing Strategy *Housing 2041*, programs such as *Future Directions for Social Housing* will increase the supply of social housing, including 2,600 new and replacement homes and measures to improve the design and delivery of social housing, are supported by Hume, it is becoming ever more apparent that the gap is widening.

3. Draft Hunter Regional Plan 2041 – Discussion and Recommendations

As noted in this submission a whole of government response is required to address housing affordability in NSW. Housing 2041 – NSW Housing Strategy observes that recognising affordable housing as essential social infrastructure can support wellbeing, inclusivity and economic sustainability. The Strategy also notes that the planning system provides a framework to provide greater supply of social and affordable housing, however observes that there is potential to increase the delivery of well designed and well located affordable housing across the site. This strategy puts forward a range of options including:

- Development of appropriate government owned land;
- Encouraging build to rent models; and
- Incentives to build affordable housing in mixed tenure communities.

The Strategy notes that good outcomes can be achieved by working with community partners, such as Hume, and the private sector.

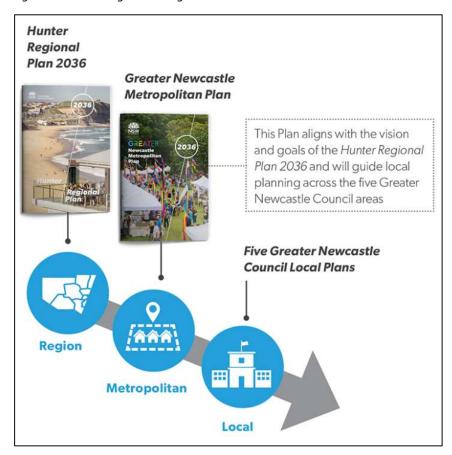
Planning strategies such as the Draft Hunter Regional Plan 2041 (and current Plan), the Greater Newcastle Metropolitan Plan 2036 and Local Strategic Planning Statements and Local Housing Strategies, prepared by individual Councils can act as a vehicle for recognising demand for social and affordable housing at regional and local scales. Appropriate recognition of shortfalls and demand in turn allows for the development of appropriate implementation strategies to identify, in collaboration with stakeholders such key government agencies (e.g. LAHC) and CHPs (e.g. Hume), opportunities to improve the supply and quality of social and affordable housing where it is needed.

There is minimal provision in the current Regional Plan, adopted Local Strategic Planning Statements and Housing Strategies, and as exhibited, the Draft Hunter Regional Plan 2041 is somewhat underwhelming.

Notwithstanding, there is scope to improve the approach to housing diversity and social and affordable housing in the Draft Hunter Regional Plan 2041, which will then set the correct narrative for subsequent metropolitan plans and local strategic planning statements (see **Figure 4**) and thus create opportunities to improve and target the supply of social and affordable housing.



Figure 4- Hunter Region Strategic Plans



The below provides feedback on the key objectives and approach to the delivery of the Draft Hunter Regional Plan 2041:

3.1. Making it Happen - Infrastructure First and Place Based Approach

The 'infrastructure first and place based approach' which underpins the Draft HRP 2041 presents an opportunity for strategic objectives to be progressed in an integrated and collaborative manner. In broad terms the approach adopted is supported. As drafted, it is however unclear how this approach will prioritise social and affordable housing in the region.

3.2. Social and Affordable Housing as Essential Infrastructure

The Regional Housing Taskforce found the delivery of diverse and affordable housing in Regional NSW to be a significant challenge. For social and affordable housing, the Taskforce considered it to be essential infrastructure. The Draft HRP 2041 sets down the following six steps (**Figure 5**) to deliver the objectives of the strategy:



Figure 5 - Key Steps - Draft Hunter Regional Plan 2041



We understand the analysis of infrastructure servicing needs will involve applying an infrastructure framework to identified investigation area to understand the infrastructure required to service each place.

We recommend that this framework make provision to analyse the anticipated needs and identified shortfalls for social and affordable housing to ensure it is given appropriate recognition in subsequent prioritisation and development of place strategies. This task is most appropriately undertaken by the Urban Development Program Committee (UDP), which would include representatives from stakeholders such as key CHPs and LAHC.

3.3. Mandated Targets for Delivery of Social and Affordable Housing

As noted in *Housing 2041 – The NSW Housing Strategy,* sound planning strategies and decisions are underpinned by accurate data and evidence. While the Draft HRP 2041 recognises the need for greater diversity in housing with social and affordable housing to form a critical part of the equation, the Plan does not go to the extent of analysing the nature of the shortfall or predicted demand over the life of the Plan.

In line with *Housing 2041*, we encourage DPE to ensure that the Plan is better enabled by sound data which will assist in forecasting future needs and monitoring supply. Importantly, this step will also pave the way for targets to be set within the Plan. We envisage targets can focus on the region as a whole, specific LGA's and specific housing typologies. This will in turn set benchmarks which must be carried through to Local Strategic Planning Statements and Local Housing Strategies, compelling local Councils to better understand the predicted needs of its community and facilitate implementation.



We note that other regional plans, including the recently exhibited draft *Central Coast Regional Plan 2041* incorporates affordable housing targets (**Figure 6**) and encourage the same for the Hunter Region, using relevant and reliable data and evidence to inform the targets.

Figure 6 - Central Coast Affordable Housing Targets

Central Co	ast affor	dable ho	using tar	gets
	Small renting	Family renting	Small purchasing	Family purchasing
Affordable to very low	8,000	5,900	2,100	1,400
income households	(+1,900)	(+1,400)	(+500)	(+500)
Affordable to low	2,100	3,800	1,900	2,300
income households	(+500)	(+900)	(+50 <mark>0</mark>)	(+600)
Affordable to moderate	500	900	800	1,800
income households	(+100)	(+100)	(+200)	(+400)

In setting these targets, the Draft Central Coast Regional Plan 2041 also recognises the importance of collaborating with community housing providers to build capacity, facilitate partnerships and remove planning barriers.

3.4. Prioritisation of Social and Affordable Housing

The Draft HRP 2041 includes provision for the development of a sequencing and delivery report which will include:

- evaluation of investigation areas against the criteria;
- Hunter-wide sequencing priorities covering all place strategies;
- roles and responsibilities for place strategies; and
- resourcing, collaboration and funding agreements.

The Plan describes public benefits such as It is unclear what the relevant criteria is for prioritising certain place strategies, while referencing public benefits such as the number of additional homes and the proportion of build to rent, social or affordable homes within the place strategy.

Further clarity is required to understand criteria for prioritisation. Further work with stakeholders could see the development of criteria to priorities place strategies which clearly demonstrate opportunities to deliver social and affordable housing. An example may be a place strategy which includes opportunity to unlock government owned land to increase the supply of affordable housing or facilitates targeted amendments to LEP's to upzone land (e.g. R2 to R3), increase maximum building heights or floor space ratio development standards. This could be supported by setting clear criteria around what housing types are being targeted within the place strategy and identifying priority sites within a particular precinct or LGA.



We note this approach aligns with the findings and recommendations of the Regional Housing Taskforce, which notes that the planning system can facilitate the delivery of social and affordable housing through:

prioritising the delivery of social and affordable housing in strategic plans, setting appropriate incentives to encourage greater supply of such housing types and streamlining their planning pathways..

Through appropriate prioritisation and investigation within the Regional Plan, greater opportunities to deliver master planned outcomes consistent with Hume's experience at Telopea will arise.

3.5. Stakeholder Inclusion – Hunter Urban Development Program Committee and Place Delivery Groups

To achieve the aims and objectives of *Housing 2041 – The NSW Housing Strategy* a series of measures and directions which underpin the strategy have been adopted. Noting that government 'cannot do it alone' the first measure is to encourage 'enhanced partnerships and cross sector collaboration' with the following recommendations made to achieve this

We note that Draft HRP 2041 includes appropriate mechanisms for collaboration with key stakeholders to facilitate the key delivery of the Plans objectives. As provided in **Figure 7**, the Hunter Urban Development Program Committee will play a central role over the life of the Plan:

Figure 7 - Hunter UDP Committee

Infrastructure & service providers	Local government & authorities	Industry & professional stakeholders
AusGrid	Cessnock City Council	Housing Industry Association
Council's water and wastewater sections	City of Newcastle Council	Planning Institute of Australia
(if not covered by HWC)	Department of Regional NSW	Property Council of Australia
Essential Energy	Dungog Shire Council	Urban Development Institute of Australia
Health Infrastructure NSW	Lake Macquarie City Council	
Hunter Water Corporation (HWC)	Land and Housing Corporation	
School Infrastructure NSW	Maitland City Council	
Transport for NSW	MidCoast Council	
	Muswellbrook Shire Council	
	Port Stephens Council	
	Singleton Shire Council	
	Upper Hunter Shire Council	

While the role and function of this committee, as described in the Plan, is supported by Hume, to achieve meaningful progress on matters such as social and affordable housing across the region, a place should be made on the committee for representatives from key CHP's such as Hume along with LAHC.

We also note that the development of place strategies will be overseen by a place delivery group. The plan notes these groups will be chaired by the department, and including relevant public authorities, infrastructure providers, LALCs and councils. To ensure social and affordable housing is given appropriate priority in the development of place strategies, we recommend that CHP's and LAHC are given opportunity to form part of the place delivery groups.



4. Plan Objective 4 - 'Plan for "Nimble Neighbourhoods", diverse housing and sequenced development'

The Draft HRP describes the region's evolution to a 'new normal' and the responsibility to address learnings and challenges arising out of the pandemic, but also pre – existing challenges. The Plan describes the need to rethink the role and function of local neighbourhood centres to provide most every day needs (the 15 minute neighbourhood) and a second scale where more infrequent services are accessible within 30 minutes by way of walking, cycling or public transport, to create more 'nimble neighbourhoods'. Reductions in car dependency and are more healthy built environment are cited as reasons why this objective is in the public interest.

The Draft Plan seeks to achieve this through providing greater diversity of housing, also noting the need to provide more affordable housing. Increasing density and housing diversity is noted as a key mechanism with the development of housing between two and four storeys within walking distance of town centres, public open space and rail stations and the promoting of a wider range of housing types and lot sizes in greenfield areas at densities that will strategically support successful public transport and a mix of uses the target.

It has been well documented (Regional Housing Taskforce 2021) that the COVID 19 pandemic has, in conjunction with other demographic shifts, contributed to changes in the nature of housing demand in the region, which has directly affected housing affordability. The increased demand for social and affordable housing in the region is without doubt a part of the 'new normal'.

The need for services to be readily accessible by walking, cycling and public transport is of paramount importance for those in social and affordable housing. As noted in this submission, much of the social housing in the region is at the end of its useful lifestyle, and is predominantly low density housing.

We observe the Plan notes that

The provision, retention and refurbishment of supported and specialised housing that meets an identified need should be supported.

And subsequently states that:

Councils should work with providers to identify sites that may be suitable for supported and specialist accommodation taking account of:

- local housing needs information;
- sites with access to relevant facilities, social infrastructure and health care, and public transport; and
- the increasing need for accommodation suitable for people with health conditions.

While Hume are in support of the objective and direction in the plan, we would encourage a stronger position based on anticipated needs for particular LGA's, delivery targets which can then be benchmarked, and for these requirements / targets to be mandated in and form part of Local Strategic Planning Statements and Local Housing Strategies. Without a stronger emphasis on the needs of a particular community / LGS, demand, targets, and recognition of social housing as key infrastructure, there is concern that the narrative for social housing will fall away at a local level. Again, we reinforce the need for key stakeholders from the sector to sit on the Hunter Urban Development Program Committee and Place Delivery Groups.



5. Next Steps

As the Department works towards finalising the Hunter Regional Plan 2041, Hume Community Housing would appreciate the opportunity to meet with the Department to discuss the recommendations made in this submission, and importantly, discuss the housing assets managed by Hume to identify opportunities which may benefit from further collaboration with Hume Community Housing and master planning to unlock future opportunities to deliver new social and affordable housing.

If you have any queries, please do not hesitate to call me on

Regards



From:

To:

DPE PSVC Hunter Mailbox

Subject: LATE SUBMISSION - Draft Hunter Regional Plan 2041

Date: Wednesday, 9 March 2022 11:03:16 AM

Attachments: image001.png image002.png

1150 Hume Draft HRP Submission 08032022.pdf



I've just received final sign off from my client on this one.

Apologies for this arriving as a late submission.

We look forward to the Draft Plan progressing and trust the feedback provided in our submission contributes to further refinement.

I believe further consultation with my client, Hume Community Housing, who control over 2000 social and affordable dwellings in the region, would benefit the narrative and future implementation of social and affordable housing objectives in the Plan.

If this is of interest to DPE, please do not hesitate to contact me.

Regards



From: On Behalf Of DPE PSVC Hunter

Mailbox

Sent: Wednesday, 2 March 2022 3:12 PM

To:

Subject: RE: Submission - Draft Hunter Regional Plan 2041

Good Afternoon

Thank you for your email to the Department of Planning and Environment.

I have discussed the below request with our manager, who agreed to provide an extension for the regional plan submission until Tuesday, 8^{th} of March.

Please email the submission to our mailbox at hunter@planning.nsw.gov.au
Hope this helps.

Kind Regards,



The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing

commitment to providing places in which Aboriginal people are included socially, culturally and economically.

From:

Sent: Wednesday, 2 March 2022 5:35 AM

To: DPE PSVC Hunter Mailbox < <u>Hunter@planning.nsw.gov.au</u>>

Subject: Submission - Draft Hunter Regional Plan 2041

Sir / Madam,

I've only recently been engaged by community housing provider to assist in preparing a submission in response to the Draft Hunter Regional Plan 2041.

The preparation of the submission has been disrupted by COVID 'down time'. We are still working through the content of the submission with internal stakeholders in the organisation. While we aim to have the submission in by Friday 04 March, to ensure we best capture input from internal stakeholders within the CHP, I'm wondering if DPE will consider late submissions and if so, how best to submit after the closing date?

Should you need to discuss, please do not hesitate to call.

Regards



From:
To:
DPE PSVC Hunter Mailbox
Subject:
Draft Hunter Regional plann2041
Wednesday, 9 March 2022 4:58:12 PM

Hi,

I am a land holder at Lochinvar, 182 Station lane I would like to express my concern with the draft plan 2041 as it appears the rear section of my 100 acre property will be impacted by a proposed Heavy Industrial area. Planning for this area it will be adjoining onto a zoned residential area currently under construction with approx 5000 houses due to be built over the course of the whole project. It does not make any sense this residential area needs room to expand further to the west to be able to take full advantage of the infrastructure that will be all ready in place and allow Maitland to expand further.

Please look at removing this land section from Station lane Lochinvar to Allandale Rd Harpers Hill from this new 2041 draft plan.



From:
To:
Cc:
Subject: Draft Hunter Regional Plan 2041 - Hunter Water submission
Date: Wednesday, 9 March 2022 5:53:13 PM

Attachments: image733081.PNG
image001.jpg
image002.jpg
image003.jpg
image003.jpg
image004.jpg

image006.jpg HW2016-245 4 10.003 Letter - Draft Hunter Regional Plan 2041 - HWC submission - final(2).PDF

Hi all, thanks for the discussion today. I have provided Hunter Water's formal submission for the Draft Hunter Regional Plan 2041. Please contact me if you would like to discuss and clarify any of the issues raised in the submission.

Thanks



This transmission is confidential and intended for the addressee only. If you have received it in error, please delete it and notify the sender. Unless explicitly attributed, the opinions expressed in this e-mail are those of the author only and do not represent the official view of Hunter Water Corporation.

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Hunter Water Corporation ABN 46 228 513 446

PO Box 5171 HRMC NSW 2310 36 Honeysuckle Drive **NEWCASTLE NSW 2300** 1300 657 657 enquiries@hunterwater.com.au hunterwater.com.au

4 March 2022

Local and Regional Planning Department of Planning and Environment PO Box 1226, Newcastle NSW 2300

via email: hunter@planning.nsw.gov.au



RE: Draft Hunter Regional Plan 2041

Hunter Water appreciates the opportunity to participate in the Hunter Regional Plan planning process. Integral to Hunter Water's role as the regional water utility is its support for, and facilitation of, responsible and sustainable development that contributes to the prosperity of the region.

Hunter Water has reviewed the draft Plan, and offers the following key issues, strategic comments, with specific review comments provided in Attachment 1.

While Hunter Water supports the strategic framework incorporating growth, community, resilience and equity, we acknowledge that the eight separate objectives will have varying levels of participation by Hunter Water, but combine to influence the growth and economic development of the region.

To that end, Hunter Water supports the framework and objectives of the Hunter Regional Plan 2041, with the request to consider the following key issues and strategic topics within the Plan's development, and to have a meeting to discuss specific plan references and details.

The key issues are:

- **Drinking Water catchments** the drinking water catchments represent an essential community resource which should continue to be effectively managed through the application of the Neutral or Beneficial Effect (NorBE) principle. The Draft plan implies that all drinking water risks can be managed through infrastructure, which is not the case, and may have an impact on future development.
- Objective 5 On-site Sewerage Treatment The Plan identifies (page 45) a proposal whereby "increasing water and wastewater capacity to towns and villages" will benefit villages through allowing development while managing water quality risks.

This proposal is inconsistent with both the Independent Pricing and Regulatory Tribunal (IPART) and other government agency principles being that the beneficiaries of wastewater infrastructure are required to fund the design and construction of new infrastructure. Therefore, we request that this paragraph be modified to be consistent with this wastewater servicing principle.

The strategic topics include:

Lower Hunter Water Security Plan

Hunter Water appreciates the Plan's acknowledgement of the "Greater Hunter Regional Water Strategy and the Lower Hunter Water Security Plan that are long term roadmaps to ensuring the region has a resilient and sustainable future", and reinforces Hunter Water's commitment to partner with the NSW Department of Planning and Environment, Councils and developers for a sustainable water future.

Hunter Region Drinking Water Catchments

One of Hunter Water's primary strategic interests relates to the protection of the region's drinking water catchments, most of which are gazetted as Special Areas under the *Hunter Water Act 1991* and described in the *Hunter Water Regulation 2015*. There are six Special Areas within the Hunter Region being:

- Williams River Catchment Area,
- Grahamstown Dam Catchment Area,
- Chichester Dam Catchment Area,
- Tomago Sandbeds Catchment Area,
- Nelson Bay (Tomaree) Sandbeds Catchment Area, and
- North Stockton Sandbeds Catchment Area (there are currently no water extraction activities occurring within the Stockton Sandbeds).

In addition to the gazetted catchments, Hunter Water provides potable water to the towns of Gresford and East Gresford which is sourced from the Paterson and Allyn Rivers. These catchments are not protected as Special Areas, however they are identified as drinking water catchments in clause 6.5 of the *Dungog LEP 2013*, along with the relevant gazetted catchments in Dungog LGA, and are therefore afforded a degree of protection with respect to land use planning.

Hunter Water's Operating Licence requires compliance with the Framework for Management of Drinking Water Quality that is part of the Australian Drinking Water Guidelines (ADWG). The Framework requires adoption of an effective and robust multiple barrier approach to the protection of water quality, and states that "the most effective barrier is protection of source waters to the maximum degree practicable". Prevention of pollution or contamination of water in the catchment areas is of paramount importance to Hunter Water, as it is key to ensuring the barrier is effective and the water source is, subsequently, sustainable and resilient.

Hunter Water expects that all development in drinking water catchments will demonstrate a Neutral or Beneficial Effect (NorBE) on water quality. A development is considered to demonstrate NorBE if the development:

- has no identifiable potential impact on water quality, or
- will contain any water quality impact on the development site and prevent it from reaching any watercourse, waterbody or drainage depression on the site, or
- will transfer any water quality impact outside the site where it is treated and disposed of to standards approved by the consent authority.

The requirement for developments to demonstrate NorBE is stated in development guidelines prepared by Hunter Water in consultation with all relevant determining authorities and is endorsed by all of these parties. Hunter Water's guidelines for development in drinking water catchments are available on the web site and can be accessed at the following link -

https://www.hunterwater.com.au/documents/assets/src/uploads/documents/Building-and-development2/Drinking-water-catchment/Guideline-GuidelineForDevelopmentInDrinkingWaterCatchments.pdf.

The NorBE requirement aligns with planning requirements for Sydney's drinking water catchments and Hunter Water recommends the principle be similarly adopted for the Hunter's drinking water catchments. The NorBE principle was adopted in the Hunter Regional Plan 2036 (see Action 15.5) and Hunter Water recommends its continued inclusion and reinforcement within the Hunter Regional Plan 2041.

Liveability, Integrated Water Management and Blue-Green Grids

Hunter Water supports the focus on greening, green infrastructure, and green corridors as a key means of facilitating more liveable urban areas and enhancing biodiversity values. These features are often connected with waterways, or blue-green grids and it is recommended a greater focus on waterways and a shift in focus and language from green to blue-green grid/corridor/infrastructure would enhance the plan.

Hunter Water reiterates its previous comment that the plan largely places responsibility on local Councils for the development of public space and recreation plans and structure plans that support urban greening. A more consistent approach for our region may be for an expansion of Metropolitan Greenspace Program to include the Lower Hunter, incorporating Hunter Water's participation along with that of the councils and other relevant agencies. This approach would align with the recent change from a Greater Sydney Committee to a "Six Cities" vision and associated Premier's Priorities for Greener Public Spaces and Greening our City. The development of a pilot program was flagged in the GNMP. Council could then deliver more detailed plans for their areas. The need for an integrated approach to achieving liveability, stormwater harvesting and recycling water outcomes are further explored in Hunter Water's submission on the Design and Place State Environmental Planning Policy – Explanation of Intended Effect. A copy of the submission is included in Attachment 2.

Sequenced Development

Hunter Water supports the focus on sequencing development for the efficient use of infrastructure. Hunter Water acknowledges that water and wastewater servicing infrastructure is essential for development which supports the economic, social and environmental sustainability for the Hunter.

While we will continue to partner with the NSW Department of Planning and Environment, councils, developers and other infrastructure providers to support the planning framework, we acknowledge the need to progress the practical implementation of the Greater Newcastle Urban Development Program into a live information portal. Hunter Water is supportive of participating in this improvement and would be interested in having discussions about the participation and implementation of the Urban Development Program and the Place Delivery Group.

Continued Partnership

While these strategic topics provide both opportunities and challenges for the scale and locality of growth and development, Hunter Water is committed to working with all partners which may require innovative technologies and arrangements to deliver the aspirations for our region.

In addition to the strategic topics, Hunter Water would like to discuss with the Department specific Plan references for clarity and context, including treatment facility buffer zones, cycleways and shared paths, street scape infrastructure access, stormwater harvesting and recycled water applications, cooler place/tree-canopy and infrastructure conflict, Broadmeadow, Morisset, Medowie, etc. So we look forward to discussing both the strategic and specific topics in the near future.

If you require further clarification regarding this submission or to establish a meeting to discuss the matters raised, please contact me by email at

Yours sincerely

Att: 1. Detailed comments on the draft Plan

2. Hunter Water's submission on the Design and Place State Environmental Planning Policy – Explanation of Intended Effect

Attachment 1: Detailed comments on the draft Plan

Introduction

Page 9 – Hunter Water fully supports the adoption of the United Nations Sustainable Development Goals (UNSDGs) as the cornerstones for planning and the planning principles that follow from the adoption of these goals. This approach augurs well for the realisation of sustainable planning outcomes in the region. However, particularly regarding resilience, environmental degradation from development and land use practices are known to increase the vulnerability of water sources, in terms of both source water quality and quantity, if not controlled.

The results of long-term water quality monitoring by Hunter Water display a trend of deteriorating water quality in surface water catchments. This is expected to be further exacerbated by climate change. Given the fundamental importance of clean and reliable water supply to sustainable development and public health and the value of water security to the community, as reflected in UNSDG 1, Hunter Water recommends that protection of source water in drinking water catchments should be a prominent feature of the Plan.

Page 10 – Hunter Water is pleased to see the narrative about integrated planning in the Plan with reference to the Greater Hunter Regional Water Strategy and Lower Hunter Water Security Plan. This is elaborated further below under Objective 6, however we suggest it would be useful to cross reference relevant priorities and actions from the NSW Water Strategy – Priority & Action Plan, in particular Priority Action 4.4 - Better integrate land use planning and water management (https://dpie.nsw.gov.au/water/plans-and-programs/nsw-water-strategy/toward-2050/priority-4) in this section of the Plan .

Page 14 – Regional Vision – we suggest rewording of the last paragraph to highlight the important role catchment protection plays in sustaining the region's drinking water supply and community resilience, which is considered appropriate for the vision, to "The natural environment enriches the experience of living in the region, sustains the regions water supply protects water catchments to sustain high quality and reliable water supplies across the region and protects biodiversity."

Part 1 – Making it happen

Regarding the *Infrastructure first and place-based framework* (also in Appendix C) we note that Hunter Water typically raises issues in Planning Proposals about land development constraints, eg. drinking water catchment protection, wastewater treatment plant buffers and servicing requirements, and opportunities, eg. water and/or wastewater system capacity. We would welcome a role in the place strategy process where relevant in order to continue to ensure that these matters are adequately addressed in the proposed streamlined rezoning process.

Hunter Water also has an integral role in the staged delivery of new growth areas and requires ongoing review of water and wastewater servicing strategies throughout the delivery phase of growth areas to ensure that delivery of these services is both well planned and timely.

Part 2 - Objectives

Objective 4: Plan for "Nimble Neighbourhoods", diverse housing and sequenced development

Page 37 – Hunter Water recommends an additional point related to the needs of housing development – 'ensure the security of clean water for communities by protecting the supply and quality of water in drinking water catchments.' This would help to limit the

current trend of deteriorating water quality and uncertainty of supply as a result of unsustainable land use practices and development across the region. For example, land use and development in the Medowie area currently presents the highest risk to the Lower Hunter water supply system and careful planning is required to ensure this risk is not exacerbated, and hopefully is reduced, with future development in the area.

Protection of drinking water catchments should therefore be considered when identifying future growth areas and Hunter Water is committed to working with DPE Planning, local Council's and other stakeholders to:

- Plan future settlements so they do not encroach or unduly impact on sensitive land in drinking water catchments, and
- Expand existing settlements such that development will not impact on drinking water catchments (noting that demonstration of NorBE is required for developments in drinking water catchments).

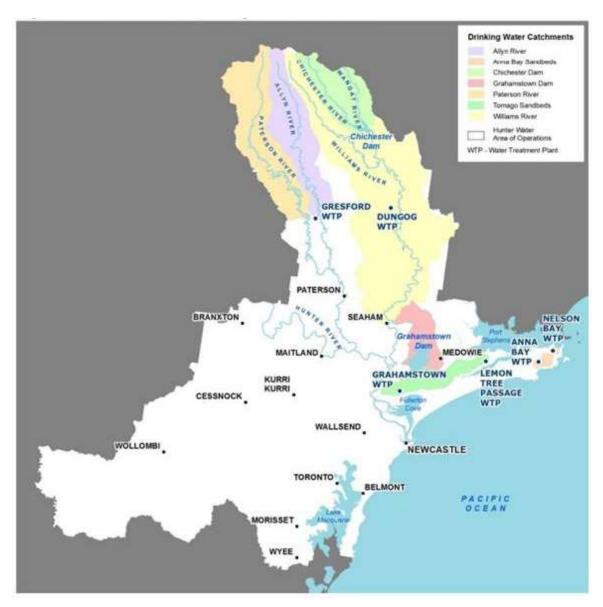
We suggest that land use conflict associated with housing developments in wastewater treatment works buffer zones could be reduced by amending the second last point to include reference to significant industrial and public utility sites.

Objective 5: Increase green infrastructure and quality public spaces and improve the natural environment

Pages 44-45 - Hunter Water previously suggested broadening the focus on green infrastructure (and "greenways") to "blue-green" infrastructure to acknowledge the central role that water plays in supporting liveable communities and healthy environments. We note that while the Plan includes numerous references to water and waterways, this suggestion was not included in the draft Plan and the focus remains on green infrastructure. This role is called out in the draft Lower Hunter Water Security Plan (LHWSP) and we reiterate that this linkage could be highlighted and expanded in the Plan as a more holistic approach to regional planning for the reasons mentioned. This could include a shift in focus and language in several areas in the Plan, including Objectives 5 and 6 and several place plans.

This objective presents an opportunity to reinforce the messaging included in the previous 2036 Plan that focused on managing future land use planning and development in a way that is compatible with protecting the security and quality of the region's water supply (see Direction 15 from the 2036 Plan). This is particularly important in areas containing drinking water catchments (including groundwater catchments). Hunter Water recommends identifying where the drinking water catchments are located more prominently than is illustrated in Figure 21 of the draft Plan so they are obvious – see the catchment areas in the figure below. We also recommend identifying the importance of protecting these areas in accordance with Australian Drinking Water Guidelines and stronger reference to application of the NorBE principle to development in drinking water catchments.

The need for conservation of soil resources to support healthy and productive landscapes and the regional economy is also a significantly understated natural resource management issue. Environmental and economic impacts can be significant when soil resources are not managed well. This is particularly the case for waterways and the water supply system. While implicit in environmental aspects mentioned in the Plan, it would be beneficial to have this important natural resource management issue recognised specifically in the Plan.



We suggest that the last paragraph on page 44 could be better worded as follows to more accurately reflect the current situation and desired outcome, and also recognise the hierarchy established in the multi-barrier protection principles in the Australian drinking water management framework where source protection is paramount - "The connection between water and settlements is also being felt in the towns and villages within drinking water catchments, such as Clarence Town and Paterson Dungog. These places are increasingly desirable to settle and important locations for the tourism and agricultural sectors. However, new development or and land uses within drinking water catchments could need to be well planned and managed in order to not cause a decline in water quality, increasing the costs of treating water treatment and supply." (Medowie could be added to this statement or substituted for Dungog as a more relevant settlement in the drinking water catchment if preferred.)

Regarding *The public interest in why we need to accomplish* it for this objective, we again note the observed trend in deteriorating water quality and security and the opportunity to reverse this trend with good planning for future development and land management, which would be a welcomed addition to the narrative in this section of the Plan.

Page 46 – The public space and urban greening – Hunter Water is fully supportive of Strategy 5.1 (integrated water management) to reduce demand on the drinking water supply system although it would be desirable to see a firm commitment to a metropolitan

greenspace program for the Hunter and for the NSW government to lead the development of this program rather than councils.

Page 47 – *Biodiversity values* - Hunter Water recognises the significant contribution to regional biodiversity values that is provided by land owned and/or managed by the corporation for catchment protection. Hunter Water intends to practice good land management stewardship, which will contribute to the biodiversity strategies identified in the Plan.

Page 49 - Waterways and drinking water catchments – rewording of Strategy 5.10 is required for accuracy and clarity to "...applying the neutral or beneficial effect (NorBE) on water quality objectives to land use planning and development in surface and groundwater drinking water catchment areas..." Reference to Hunter Water's development guidelines in this strategy (and their inclusion in the Plan references on page 127) is also suggested to complement the objective.

We similarly recommend rewording Strategy 5.11 to "Development proposals should support the protection of drinking water catchments and the sustainable growth of recreation and tourist facilities in inland and coastal lakes."

Objective 6: Reach net zero and increase resilience and sustainable infrastructure

Page 50 - The Draft Lower Hunter Water Security Plan (LHWSP) was publicly exhibited in late 2021 (see <u>Hunter Water Draft Lower Hunter Water Security Plan</u>). One of the strategic priorities identified in the Draft LHWSP is to improve the resilience of Hunter Water's existing water supply system, which aligns well with this objective. The Plan may therefore benefit from a brief mention of the LHWSP given its integral role in sustainable development to complement the existing narrative around carbon emissions.

The Draft LHWSP identified an Upper Hunter water transfer scheme as a possible solution to long-term water security, which would draw raw water from Lostock Dam or the Paterson River. Although the Paterson and Allyn River catchments are not currently gazetted as Special Areas, Hunter Water retains a strong interest in their protection from a land-use and sustainable development perspective and this interest would extend further downstream in the Paterson River catchment if the proposed scheme is adopted.

Page 52 – Community resilience to natural hazards – reference to the LHWSP is appropriate in Strategy 6.3, however we recommend rewording as follows for accuracy (from Hunter Water's perspective) - "Hunter Water and other water providers, will meet the community's growing water supply needs under all climatic conditions, including minimum supply requirements during a long and severe drought. This will require a greater focus on water efficiency, working with the community to save water, and a transition to rainfall-independent water sources as part of the Lower Hunter Water Security Plan and drought management plans in other areas". We also note that community engagement during development of the LHWSP identified that the community places a high value on having access to safe, reliable, sustainable and affordable drinking water supply.

Part 3 – District planning and growth areas

Page 66 – Figure 8: Williamtown regionally significant growth area – it would be useful to show Hunter Water protected catchment lands on this figure as open space, which is a more appropriate representation of these areas. Mapping data can be provided.

We note the occurrence of significant Hunter Water drinking water catchment areas in the Hinterland (pages 97-100) and Coastal (pages 115-117) districts and it would be useful to include reference to this fact, similar to the Barrington district. The Plan should note that the NorBE principle applies to development within catchment areas in these districts.

We particularly note that the Tilligerry Peninsula and Karuah obtain 100% of their drinking water supply from the eastern end of the Tomago aquifer and the Tomaree Peninsula

obtains approximately 80% of its drinking water supply from the Tomaree aquifer. The raw water extracted from these aquifers and supplied to the respective communities is the highest quality raw water source within Hunter Water's area of operations and currently requires the least amount of treatment prior to being delivered for drinking purposes. In addition to the filtration provided by the sand aquifers, the high quality of these water sources can be attributed to the largely undeveloped condition of the catchments and the risk to drinking water quality associated with future growth in these areas must be considered. We are aware that this situation also applies to several other communities in the coastal district.

We also recommend identifying drinking water catchments on relevant figures where not already shown (Figures 7, 8, 23 and 28).

Attachment 2: Hunter Water's submission on the Design and Place State Environmental Planning Policy – Explanation of Intended Effect



Hunter Water Corporation ABN 46 228 513 446 PO Box 5171 HRMC NSW 2310 36 Honeysuckle Drive NEWCASTLE NSW 2300 1300 657 657 (T) enquiries@hunterwater.com.au hunterwater.com.au

28 April 2021

Department of Planning Industry and the Environment Locked Bag 5022 Parramatta NSW 2124

Submission on the Design and Place State Environmental Planning Policy – Explanation of Intended Effect

Hunter Water Corporation (Hunter Water) is a State-owned corporation providing drinking water, wastewater, recycled water and some stormwater services to a population of almost 600,000 people in homes and businesses across the Lower Hunter. Hunter Water has reviewed the Explanation of Intended Effect (EIE) for the proposed *Design and Place State Environmental Planning Policy* focussing in particular on those areas related to water efficiency and water management, green infrastructure and the BASIX review and provides the following comments.

Aims, principles and application

Hunter Water supports the proposed aims and principles of the *Design and Place SEPP*. The aims and principles are consistent with and support our vision to be a valued partner in delivering the aspirations for our region.

The 2020 Federal Government Productivity Commission Research Paper on Integrated Water Management identified the boundary between water and land planning and the lack of clear objectives for water-related aspects of urban amenity as two of the policy environment impediments to effective integrated water planning. Principles 1 and 4 of the Design and Place SEPP go some way towards identifying the important role water plays in enabling urban amenity. The principle-based approach will provide space for and support the adoption of more innovative and collaborative integrated water management solutions at the precinct and site level.

Integrated water management, such as water recycling, and groundwater and stormwater harvesting, provides environmental and customer benefits, as well as broader system benefits of building system resilience. Recycled water and stormwater harvesting schemes also have strong support from our community - more than 90% support considering these options in the long-term water supply demand mix. These benefits and community support should be recognised and reflected in policy and infrastructure planning decision making.

The water industry has been investigating the broader social and environmental benefits of integrated water management. A Frontier Economics study on the "Health Benefits from Water Centric Liveable Communities" quantifies the liveability health benefits associated with water industry investments to better inform investment decisions. It found that investing in urban water to create liveable cities improves mental and physical health by supporting more active recreation, reducing the temperatures associated with the Urban

Heat Island effect, lowering air pollution levels and providing greater exposure to green space.

Hunter Water and the local councils in our area of operations have used the benchmarking tool developed by the CRC for Water Sensitive Cities to identify our region's current water sensitive performance and opportunities for improvement. Areas such as governance, community engagement, equity of service, productivity and resource efficiency, adaptability, ecological health and the quality of urban spaces were all assessed as part of the process. The CRC has a large library of research papers and Australian based case studies related to integrated water management.

The Water Services Association of Australia's (WSAA) "Blue+green=liveability" paper outlines the benefits of investing in water-enabled green and blue infrastructure and provides case study examples. To achieve these benefits WSAA identifies the need for the water industry and governments on all levels to collaborate on harnessing the full water cycle, taking an integrated approach to land and water planning, implementing an effective framework for evaluating health and liveability benefits and creating new funding and financing models for green and blue infrastructure as social infrastructure.

Planning and delivering integrated water solutions is a complex area involving multiple stakeholders, such as government agencies, local councils, developers and water utilities. Improved coordination, decision support frameworks which reflect holistic environmental and community outcomes, and new funding models are required to facilitate these environmental and customer benefits.

In order to be successful, integrated land and water planning is required at a larger (catchment, city, region) scale, and supported by precinct and site level integrated water management planning. Small scale schemes can struggle to demonstrate effectiveness both in terms of cost and outcomes in isolation. A broader vision and understanding of planned land and water use can open up opportunities that may not make sense at a precinct level. For example, larger water recycling projects can generally be expected to benefit from significant economies of scale. These economies of scale include both up front capital investment as well as ongoing operating and management costs and the more centralised management of such schemes would assist the long term viability and benefits realisation of these schemes.

Proposed elements and design process

Hunter Water supports the inclusion of water management and green infrastructure in the Design and Place SEPP as mandatory matters for consideration in precinct design, in particular the reference to safeguarding potable water and maximising water re-use is valuable. As noted above, in order to achieve integrated water management solutions, it is important that the broader regulatory environment is supportive of alternative water supply and that there is guidance available to ensure that these systems can be safely and sustainably operated and maintained. Hunter Water would also suggest that water management as a mandatory matter for consideration be extended to include significant development.

The emissions and resource efficiency requirements for offices, shopping centres, hotels and apartment buildings includes energy targets but not water efficiency targets. The Green Building Council of Australia's Green Star Rating scheme is an alternative approach that includes an assessment of both energy and water efficiency at planning stage.

Hunter Water suggests that the design evaluation and review process and the proposed Design Review Guide include consideration of integrated water management and that expertise in this area be considered for inclusion in the design review panels.

Apartment Design Guide

Hunter Water is supportive of the proposed design criteria requiring the provision of realtime water use meters for each apartment and the introduction of minimum WELS standards for apartment fittings. These measures support and empower consumers to reduce their water use.

The design criteria related to the requirement for on-site water re-use is also welcome as it reduces demand for drinking water and is strongly supported by our community. There are, however, technical and affordability challenges associated with using recycled water or stormwater for irrigation. It is recommended that specialist irrigation advice be sought to ensure any targets or benchmarks are fit for purpose and encourage the safe and sustainable adoption of these alternative water sources. As noted above, policy settings and targets should consider the affordability implications of water savings measures. In some instances, larger scale schemes may provide more cost-effective water efficiency outcomes.

BASIX reforms

While it is acknowledged that BASIX, in its current form, provides water efficiency benefits, Hunter Water supports reforms to improve the efficiency and effectiveness of the policy in this area.

A review of 30,000 single dwelling properties newly connected to Hunter Water's network in the last 20 years found that those properties connected between 2000 and 2007 consumed on average 10% more water than those connected after 2007. While there are some geographical differences in key development locations over the same period which could influence water consumption patterns, there is a noticeable reduction in average consumption in homes built after the introduction of BASIX.

To meet current BASIX requirements, most homes install a rainwater tank which is then connected to toilets, laundries and garden taps. In 2019, Hunter Water carried out a small pilot program, where customers in selected suburbs were offered plumbing audits of their rainwater tank systems. Around one third of the systems inspected were not functioning, generally because of a failed pump or switching device. This observed failure rate is consistent with that reported by the Institute of Sustainable Futures as part of a review of rainwater tank effectiveness in other parts of Australia. These findings suggest a large portion of the water efficiency benefits anticipated under BASIX are not being realised. A review of rainwater tank system design, and installation and maintenance methods may identify areas for improvement.

The site-based nature of BASIX and the timing and funding characteristics of residential developments mean that rainwater tanks are generally favoured over other alternative water supplies. However, as described above, rainwater tank systems may not be the most effective or cost-efficient option to deliver water and energy savings, particularly once energy and maintenance costs are included. More reliable and cost-effective alternative water supplies may be achieved by subsidising investments in stormwater harvesting or reticulated recycled water schemes at a precinct scale.

Showering represents the largest portion of indoor residential water use and efficient shower heads reduce both water and energy consumption. The Institute of Sustainable Futures completed an evaluation of the environmental and economic impacts of the WELS scheme in 2017. The report included data indicating that more than half of the shower heads installed under BASIX had 3-star WELS ratings while the average star rating for new washing machines and dishwashers had increased to more than 4 stars. A review of the efficiency requirements for household water fittings under BASIX may identify opportunities to deliver a similar shift to more efficient showers and taps providing both water and energy efficiency benefits.

Hunter Water would be more than happy to discuss these matters further. Please contact

O





Submission: Hunter Regional Plan 2041 Wednesday, 9 March 2022 7:17:08 PM

To Whom It Concerns, NSW Planning Department

I have only become aware of the Draft Hunter Regional Plan 2041, so humbly request your permission to allow my slightly late submission in this regard.

I refer to your online draft plan, and would like to include the concept that all existing natural forest should now be protected, preserved and where possible increased, to safeguard it from unnecessary land clearing which is the status quo of climate change contributing, native species destroying current destructive approaches to urban development.

I believe the current Strategy 5.4 in the Draft Hunter Regional Plan 2041 should be replaced with my submitted following one to absolutely safeguard existing natural forests.

Strategy 5.4

Councils should incorporate goals to protect, preserve and where possible increase the urban forest when preparing place strategies or other place-based planning so that targets will be met in local neighbourhoods without destruction of the local natural environment. This will also help address urban heat risks to reduce the impact of increasing heat waves, contribute to human wellbeing, preserve native flora and fauna and contribute positively to reducing impacts of climate change.

Yours sincerely





OUT22/2690

Department of Planning and Environment PO Box 1226, NEWCASTLE NSW 2300

hunter@planning.nsw.gov.au



Hunter Regional Plan 2041 - Public exhibition

Thank you for the opportunity to provide comments on the draft Hunter Regional Plan 2041 (draft plan), and for extending the deadline to 11 March. DPI Agriculture is generally supportive of the plan and looks forward to supporting agriculture and agribusiness growth in the diverse Hunter region.

Below are comments for your consideration in finalising the draft plan. These comments follow our advice on the draft Central Coast and Hunter Regional Plans provided 21 September 2021.

Strategic planning and place-making

NSW DPI supports the place-making initiatives in the draft plan, particularly the oversight of the 'sequencing' urban development across the Region and the encouragement of more sustainable, compact settlement forms which it is hoped will have complementary benefits such as minimising the non-strategic consumption of rural land.

We suggest the final Regional Plan would benefit from clarification and refinements as follows:

- The endorsement of local planning (place-making) strategies by DPE will provide consistency in approach and clarity for future investment decisions for the public, farmers, the development industry, and infrastructure providers.
- Local place-making strategies should identify and protect Important Agricultural Land and intensive agriculture clusters from residential and rural residential expansion to avoid land use conflict and facilitate primary industries as a major employer and provider of food and fibre in the Hunter Region. For example, on page 19, Important Agricultural Land and clusters of intensive agricultural industries should be included as an environmental constraint to the location of greenfield residential and rural residential development. We suggest adapting the protections employed in the Central Lakes district around the Hunter Expressway interchange to ensure existing agribusinesses are avoided for intensification of residential development.
- In terms of correcting anomalous strategies (p 19), it is important that incremental rural residential sprawl evident in some LGAs in the Region is managed and the Regional Plan include measures to require rigorous strategic investigations to precede future land rezoning for this use.
- On page 33, 'fine grained' planning for 15-minute neighbourhoods nominates the Brandy Hill rural residential estate. This estate is remote from settlement and

adjacent to long-established intensive poultry development. NSW DPI cautions against increased residential densities in such locations at this time.

Agriculture and rural land

- We suggest the following definition of Important Agricultural Land is included in the Glossary: 'IAL is defined as Biophysical Strategic Agricultural Land, Land and Soil Capability Classes 1-3, irrigated land, and Critical Industry Clusters (CIC) within the Hunter region' (equine and viticulture, which are noted in the draft plan). The Land and Soil Capability Assessment Scheme prepared by the Office of Environment and Heritage is used to identify LSC Classes.
- The definition of 'Rural enterprises' in the Glossary is subjective, potentially open to misinterpretation and has a narrow scope for diversification (tourism) where more 'industrial' style value adding is expected. Unless this definition is prescribed by another instrument, we suggest it be redrafted or removed.
- Encouragement of new rural enterprises, intensification of agriculture and diversification through agri tourism in the region is noted. Low-key development such as farm stays and bed and breakfast accommodation are an appropriate form of agritourism that is less likely to cause use conflict. We suggest advice provided to the effect that intensification and diversification can also increase the likelihood of rural land use conflict occurring, and means of mitigating this can be through appropriate LEP land use permissibility, application of separation distances and buffers between holdings, and representative minimum lot size criteria.
- The draft Regional Plan should refer to the agricultural profiles prepared by NSW DPI
 as a resource to assist the preparation of local place making strategies, which are in
 the process of completion. The profiles identify the top five agricultural industries
 operating in the region¹, the secondary industries which support and rely on these
 agricultural industries and the challenges and opportunities collectively faced in a
 land use planning context.

Specific comments in relation to Districts with rural zoned land

- The approach of identifying residential development staging via mapping in the Central Lakes district should be applied to the Hinterland, Barrington, and Upper Hunter districts.
- The Hinterland District supports significant investment in intensive poultry
 development and value adding, servicing local, regional and state-wide markets. It is
 suggested that the narrative on page 99 refers to this cluster and industry benefits for
 its location in the Hinterland District: proximity to similar industries, processing plants,
 transport and logistics, labour, climatic conditions, water supply and relative location
 away from metropolitan settlement pressures.
- We query the priority in the Hinterland District (p99) that supports 'incremental residential growth where constraints including important agricultural land can be managed'. We suggest the reference to incremental growth is clarified as not resulting in unserviced, non-strategic rural residential sprawl.
- In the Upper Hunter District, rural land should principally be managed to facilitate agriculture, given its importance to the regional economy and existence of significant tracts of Biophysical Strategic Agricultural Land. Development proposals on rural lands should incorporate proportionate assessments of the potential for land use conflict, including the need for generous buffers around productive agricultural lands. Sensitive land uses should be excluded from rural areas where a significant impact on agricultural potential would result.

¹ https://www.dpi.nsw.gov.au/agriculture/lup/agriculture-industry-mapping/agriculture-industry-snapshots-for-planning

- The phrasing on page 105 concerning the Barrington District minimum subdivision standards for rural zones and limitations on unrelated dwellings should be applied to all districts with rural land.
- We query the Coastal District priority that pushes rural residential development to Barrington and the Hinterland districts 'where there is more capacity for additional rural and urban housing'. Instead we suggest the narrative is adjusted to reflect the need for new growth to be directed to areas in the region that are strategically identified in plans endorsed by the Department.

I hope these comments are of assistance, a to be questions.	and have arranged for eavailable to assist should you have any

From: DPE PSVC Hunter Mailbox To:

Cc:

Subject: DPI comments Draft Hunter Regional Plan March 2022

Date: Thursday, 10 March 2022 12:13:40 PM

220310 DPI comments Draft Hunter Regional Plan March 2022.pdf image001.png Attachments:

Hi

Please find attached DPI Agriculture's response to the draft Hunter Regional Plan.

If you have any enquiries please feel free to give me a call.

Regards



From:

To:

DPE PSVC Hunter Mailbox

Subject: Feedback – Draft Hunter Regional Plan 2041

Date: Thursday, 10 March 2022 1:42:10 PM

Attachments: image001.png

Cc:

Confidentiality is requested as content below addresses minor editing suggestions on specific pages, rather than making a formal response to the whole draft plan.

Thank you for the opportunity to provide a response to the Draft Hunter Regional Plan 2041. Our feedback is specific to pages 82 and 83: *Regionally Significant Growth Areas - Liddell and Bayswater Power Station Growth Area.*

Please see below some suggestions for your consideration. These are provided to ensure the most accurate representation of the growth opportunity the site provides.

- Could the words 'investigation precinct' please be removed from the figure key for 'existing water storages', 'environmental corridor' and 'land leased for mining' – as these elements are continuing land uses, they are not areas being 'investigated' for redevelopment.
- 2. Lake Liddell Recreation Area (capitals for Recreation and Area) to reflect the correct site name in the figure key.
- 3. Transgrid transmission lines (instead of 'electrical' lines) in the figure key.
- 4. Amend Figure 14 title to Liddell and Bayswater regionally significant growth area, as the map covers both power station sites and the whole AGL landholding being redeveloped.
- 5. Second paragraph please amend to 'The planned closure of Liddell Power Station in 2023 and Bayswater between 2030-2033 provides ...'. This reflects recent AGL announcements about revised closure dates for Bayswater.
- 6. Second paragraph please amend to ... 'Plans announced for the site include solar and thermal storage systems, grid-scale batteries, an energy from waste facility and exploring the feasibility of a hydrogen hub.' This reflects the recent hydrogen MoU with Fortescue Future Industries.
- 7. Third paragraph please amend to ... 'Opportunities to co-locate other employment generating activities on the Liddell and Bayswater site ...'. To include Bayswater and the whole AGL landholding.
- 8. Would it be possible to replace the solar farm photo? The person featured isn't really wearing industry standard PPE shoes, clothing etc ... and is therefore perhaps not an appropriate representation?

Thank you – please let me know if further information or clarification is required.





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SUBMISSION ON THE DRAFT HUNTER REGIONAL PLAN 2041

10 March 2022

The is a community group working to prevent a housing development from clearing 400 hectares of remnant urban forest near Newcastle. The proposed development lies within within the Watagans to Stockton Link. Our group believes the Draft Hunter Regional Plan 2041 is a generally good document with many positive objectives.

Specifically:

- New pathways regarding traditional custodians
- Net zero emissions
- Optimum densities
- Renewed focus on green infrastructure, public space and nature
- Prioritisation of walking, cycling and public transport
- Equity
- Transition from coal

However, it is felt that the objectives could be more ambitious with clear strategies to ensure they are being achieved.

In 2021, the United Nations Climate Change Conference, COP26, of which Australia was a signatory, agreed that vegetation clearing should cease by 2030. Clearing vegetation has very significant impacts on exacerbating climate change, loss of biodiversity and diminishing threatened fauna and flora populations, and flooding and susceptibility to flooding.

Consequently, the believes that the Hunter Regional Strategy should adopt an objective of no further vegetation clearing to accommodate development. This objective should be approved and written into the draft HUnter Regional Plan 2041. Why wait if it is advantageous for the above reasons and it can be achieved earlier than 2030?

Of particular concern to our Group is Strategy 4.4 in Greater Newcastle. Greenfield development involves the clearing of the few remaining forest pockets across the city, including movement corridors of many threatened species. Greenfield development here will cut off the biodiversity link between the Watagans National Park and eastern Lake Macquarie, an extremely important wildlife corridor and a high value environmental feature. We believe this percentage should be 0 with better planning in town centres and would like to see a commitment to this number. We wish this to be considered in the current plan being reviewed not in future Hunter Regional Plans as discussed in Strategy 4.5.

More than 50 per cent of housing should be planned in Newcastle's existing urban centres and we encourage the Plan to increase this to at least 75 per cent.

Strategy 5.2 is very positive promoting low emissions in urban centres and a greater community awareness along with supporting medium to high density living. This activates the research which increasingly finds that green spaces correlate with wellbeing.

Rather than land use planning taking into account areas of high environmental value, these areas should be mapped in the Hunter Regional Plan and excluded from future development. Areas of high environmental value not only have ecological significance but are also valued by the community for recreation, exercise, birdwatching, photography, and overall wellbeing. It is vital that land clearing is halted immediately and development is instead planned in existing town centres. Critical state and local infrastructure in North West Lake Macquarie should not include new development in remnant urban forest. We would like to see approvals on the creation of more conservation lands in Newcastle and Lake Macquarie within this Plan.

The Draft Hunter Regional Plan 2041 does not adequately address the need for agricultural lands to achieve sustainability of the Hunter Region. Agricultural land continues to be lost to residential and industrial development. Ensuring adequate land for agriculture is considered fundamental to the sustainability of the Hunter Region but existing native vegetation should not be cleared to provide land for agriculture.

From: **DPE PSVC Hunter Mailbox** To: Subject: FW: Hunter Regional Plan Submission- Extended Friday, 11 March 2022 9:24:24 AM Date: **Attachments:** From: Sent: Thursday, 10 March 2022 10:24 PM To: Cc: Subject: Hunter Regional Plan Submission- Extended Thank you very much to yourself and the Department of Planning and Environment for extending the lodgement of submission dates to 11th March. This has enabled our campaign group to spend time thoroughly reviewing the Draft Hunter Regional Plan 2041.

We look forward to feedback on our submission in the coming months.

Kind regards,

SUBMISION ON THE DRAFT HUNTER REGIONAL PLAN 2041



I acknowledge the Traditional Custodians of the Awabakal, Biripi, Darkinyung, Geawegal, Wonnarua and Worimi lands, and recognise that the Draft Hunter Regional Plans will impact the future of these lands. I pay my respect to Elders and Knowledge Holders, past and present.

The Draft Hunter Regional Plan 2041 is generally good, particularly its recognition of Aboriginal Communities and its foci on Net Zero, sustainability, and urban greening.

Nonetheless, there are some issues of concern and areas that could be improved and/or strengthened. Some elements of the Plan seem to conflict with others.

Relationship between Hunter Regional Plan 2036 and Draft Hunter Regional Plan 2041

I understand that the Hunter Regional Plan is a 20-year plan that is reviewed and updated every five years. One would expect continuity from one version of the Plan to the next.

The Draft Plan has a different format – parts and objectives instead of goals and directions. The eight objectives in the Draft Plan do not align naturally with the twenty-seven directions in the Hunter Regional Plan 2036.

There appears to be little connectivity between the adopted 2036 Plan and the Draft 2041 Plan yet there is no explanation or discussion about the different approach or apparent variation in direction taken in the Draft Plan.

The goals and directions detailed in the adopted Plan (2036) have not been reviewed with performance and achievements evaluated. This should be fundamental in assessing how successful the existing Plan has been and help guide what changes may be required.

Changes in direction and new directions should be explicit.

Having said that, my perception is that the direction taken in the Draft Plan is better than that in the adopted 2036 Plan.

Relationship with Country and Aboriginal Communities

It is noted that the land about which the Hunter Regional Plan is concerned is Aboriginal Land, the sovereignty of which has never been ceded. Whilst Local Area Land Councils (LALC) are committed to helping Indigenous Peoples and Communities, they are a construct of and constrained by non-Indigenous legislation.

It is imperative that Traditional Values are recognised, valued and respected, and that LALCs are not used as a conduit through which to funnel development proposals to avoid or diminish opposition. Consultation with Traditional Custodians and respecting their views is fundamental to land use planning, including proposals by LALCs.

Indigenous People should not be positioned whereas they are forced to compromise their stewardship of Country to achieve the social and economic benefits for their Communities that are taken for granted by non-Indigenous communities.

The Hunter Regional Plan should provide support for land that is returned to Aboriginal People to be maintained in or as close to natural and tradition condition as is possible. It should not be facilitating its transition to developed land with the enticement of economic wealth so that Indigenous People can have access to adequate housing, healthcare, education, etc, that they should have equitable access to in any case.

Urban Greening and the Natural Environment

Objective five combines improving the natural environment, increasing urban greening and increasing quality public spaces into the single objective. Whilst connected they are three different issues, each of which warrants its own objective and strategies.

Natural environment is understood in this context to mean relatively undisturbed environmental ecosystems such as forests, wetlands, coast, rivers and creeks, etc that are relatively free from development and disturbance. It includes, for example, regrowth forest but not cleared rural land. Hexham Wetlands and Ash Island would be considered natural environment despite historic changes to the landscapes.

There is strong evidence that suggests that urban sprawl and development has reached its limits if we are to claim the mantle of sustainable development. Climate change is critical and irreversible. Everything possible should be done to mitigate the degree of climate change and its impacts upon the natural world, other species and human society.

In 2021, the United Nations Climate Change Conference, COP26, of which Australia was a signatory, agreed that vegetation clearing should cease by 2030. This commitment should be incorporated into the Hunter Regional Plan now, not in five years.

Sustainability of biodiversity is continuing to fail and will reach its tipping point, despite legislation and policies aimed to sustain biodiversity. Numerous species are threatened with local or regional extinction, if not total extinction. Populations are fragmented with minimal corridors, only retained to justify ongoing encroachment into remaining areas of natural vegetation. Urban development in addition to mining and forestry continues to diminish the national estate of natural environment. Many native species are subject to increasing stress on their populations becoming fragmented and diminishing in size.

The recent devastating floods along the eastern seaboard of NSW and southern Queensland have been significantly exacerbated by the clearing of vegetation, both remnant vegetation cleared for development, agriculture, mining and forestry as well as the ongoing decline of urban canopy in most urban areas. Vegetation works as a massive sponge absorbing water, holding water on

surfaces, and slowing movement to and along the ground. Severe and flash flooding are directly attributable to lack of vegetation.

It is recommended that the Hunter Regional Plan should have an objective of no more consideration or approval of vegetation clearing.

Urban greening is understood to include green infrastructure as well as urban areas of natural environment such as Blackbutt Nature Reserve. It includes vegetation on private and public land.

Natural areas in and around urban areas, such as Hunter Wetlands National Park and Blue Gum Hills National Park have been protected in recent decades, contributing social capital and environmental value for the Hunter. Abundant research over recent years has established that access to natural areas provides considerable physical and mental health benefits for members of the community, providing significant savings in health budgets. Adequate investment should be encouraged and sought to sustain, increase and improve protected natural areas in the Hunter. Natural areas should be protected from new development.

In addition to health benefits derived from sustaining natural areas, the urban forest provides substantial benefits to human health and well-being. In addition to increasing temperatures resulting from climate change, urban heat island effect increases temperatures in urban areas by as much as 5 to 7 °C above that in comparative non-urban environments. Heat-related illness is responsible for greater mortality than all other natural disasters combined and is set to increase significantly in the coming decades. Increasing the urban canopy to 30 or even 40% will reduce the frequency and duration where temperatures exceed the level where deaths start to spike.

Respiratory disease is responsible for a substantial amount of illness and death also. Trees improve air quality and thereby will reduce the extent and severity of respiratory disease, and numerous lives.

There is ample research that shows that improving urban canopy will provide substantial environmental, social and economic benefits.

However, achieving optimum urban forest canopy requires targets that each council sets for its LGA. Without targets, little, if anything is likely to change. The former NSW Premier recognised the value of urban canopy when she announced a 40% urban canopy target for Greater Metropolitan Sydney. This would seem to be a fair target for the urban LGAs and urban components of Hunter LGAs.

Canopy targets are fundamental if canopies are to be increased. Newcastle Council started discussing urban forest in 2003 and adopted its urban forest policy in 2007. It did not include targets but had an objective to adopt a target. However, a target was never set for the Newcastle LGA. Green cover in Newcastle has changed little since 2007. Canopy increased by about 1% since 2014. By comparison, the ACT which set a target for canopy cover has increased its green cover by more than 17% since 2016.

Net Zero!!

As did Objective 5, Objective 6 has several components – attain Net Zero, increase resilience and increase sustainable infrastructure. Attaining Net Zero is so important that it should be an objective

on its own with effective strategies that will work towards achieving Net Zero. It is so fundamental that it should pe presented as Objective 1, not a part of Objective 6.

Furthermore, only the sixth of the six strategies in this section plays any part in achieving a reduction in carbon emissions. As a plan that should provide guidance towards attaining Net Zero, the Draft Hunter Regional Plan 2041 falls well short of the mark.

As a strategic land use planning document, the Hunter Regional Plan could adopt the following strategies and others that would provide leverage in attaining Net Zero as quickly as possible.

- End land clearing as soon as possible or at least no later than 2030, the year by which the
 United Nations Climate Change Conference, COP26 agreed land clearing should cease.
 Only land clearing that has already been granted full consent should be permitted to
 proceed. No new land clearing proposals should be considered.
- There should be no new roads projects that facilitate increased road usage. Transportation contributes hugely to greenhouse gases, carbon pollution, atmospheric heating and urban heat island effect. Roads and transport in the Hunter should be managed to diminish the amount of carbon dioxide released to the atmosphere and contribute to reaching Net Zero and beyond as soon as possible.
- There should be no new or expanded coal mines or coal fired power stations allowed.
- There should be encouragement of renewable energy generation projects and employment in the Hunter. Transition to electric vehicles should be encouraged for as high a proportion of new vehicles as can be practically achieved.

Net Zero should be recognised as a transitional goal. It's not sufficient to get to a point that we just aren't increasing the levels of carbon dioxide in the atmosphere. The damage that has resulting from increased carbon dioxide levels needs to be mitigated and carbon levels need to be significantly reduced to the levels they were 30, 40 or 50 years ago if we are going to have any chance of mitigating the damage that has already occurred.

Final comment.

Many of the other objectives and strategies in the Draft Plan are meritorious. Some however encourage activities that are likely to conflict directly with those that aim to achieve Net Zero and reduce impacts on biodiversity.

Sustainability requires consideration and actions that will ensure that future generations of humans and other species are in no worse a situation than at the current time. Strategic planning provides the opportunity to identify ways that can prevent the current situation worsening and offer hope for improvement for future generations.

From:

To: DPE PSVC Hunter Mailbox

Subject: submission to the Draft Hunter Regional Plan

Date: Friday, 11 March 2022 9:55:31 AM

Attachments: ima

image001.png

Good morning

Thanks for the extension to lodge a submission on the Draft Hunter Regional Plan.

Please find my submission attached.

Regards

From:

On Behalf Of DPE PSVC Hunter

Mailbox

Sent: Friday, 4 March 2022 11:29 AM

To:

Subject: RE: extension for submissions to the draft Hunter Regional Plan

Good Morning

Thank you for your email to the Department of Planning and Environment.

The Department has reviewed your request and agreed to provide an extension until Friday, 11th March, to lodge the submission for the draft of Hunter Regional Plan 2041.

We hope this assist with the timeframe as required.

Kind Regards,

?

The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

From:

Sent: Friday, 4 March 2022 10:24 AM

To: DPE PSVC Hunter Mailbox < Hunter@planning.nsw.gov.au>

Subject: extension for submissions to the draft Hunter Regional Plan

Hello

May I please have extensions for submissions to the draft Hunter Regional Plan for one week for:

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This is due to the number of documents on exhibition recently including the Design and Place SEPP and Newcastle 2040.

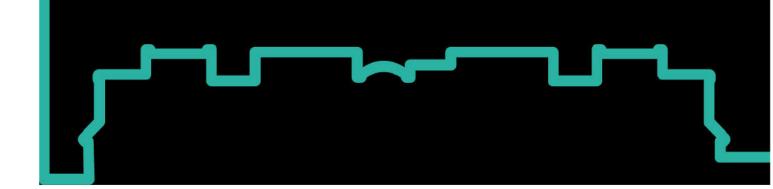
Thanks you.

Regards



NSW Department of Planning and Environment

DRAFT HUNTER REGIONAL PLAN 2041



About

has been operating since 1975 as the State's peak housing policy and advocacy body. Our vision is to create a sustainable housing system that provides secure homes for all. We pursue our vision through critical engagement with policy, practice, and thought leadership. We provide systemic advocacy and advice on policy and legislation for the whole NSW housing system to resolve housing inequality.

We are especially concerned for low-income households which struggle to afford good-quality and well-located housing in the private market.

Our approach involves engaging, collaborating, and connecting with government, the private and not-for-profit sectors, stakeholders, and consumers. Our research centres on the causes of inequity and injustice in the housing system.

We consider a sustainable housing system one that delivers what we call Triple-A housing and Triple-P outcomes.

Affordable and diverse homes	Accessible and well- located housing	Appropriate and high- quality development
Housing supply and demand Tenure forms and rights Housing types and sizes	Proximity to jobs and services Access to public transport Accessibility and adaptability	Amenity and aesthetics Energy and environment Standards and maintenance
Productive cities and regions	Poverty-free communities	Protected neighbourhoods
Access to jobs and services	Housing stress and homelessness	Energy use and consumption
Housing costs and consumption	Physical and mental health	Urban heat
Financial and economic stability	Education access and attainment	Climate resilience and adaptation

At the property of the propert

About our submission

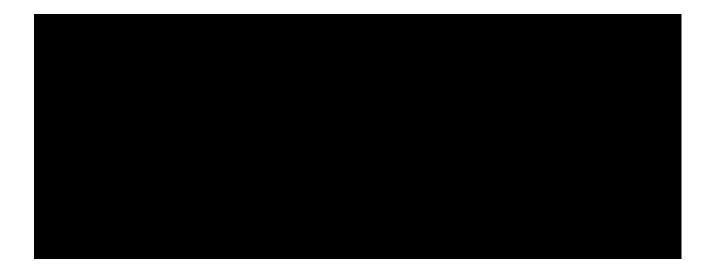
Shelter NSW thanks the Department of Planning for the opportunity to comment on the draft *Hunter Regional Plan 2041* ('HRP'). The Australian housing market has moved a long way from what many would say is its inherent and essential purpose – to provide secure, functional, and affordable shelter to all people at various stages of their lives. Housing is now considered a financial product or a wealth-generating vehicle. The private housing market in this country is consistently and persistently failing to provide secure, well-located, and affordable shelter especially for the lowest 40 percent of income earners.

Given our firmly held position that the private market fails to provide enough quality, well-located, affordable housing, we call on governments to make an urgent and widespread investment in social housing acquisition and construction. This is consistent with Infrastructure Australia's report¹ explicitly identifying the subpar quality, supply, and design of social housing across the country. The same report notes the projected need for almost 730,000 new social housing properties over the next 15 years (with current social housing stock only 4% of Australia's total housing compared to the OECD average of 6%). Further, Garry Fielding's Regional Housing Taskforce recommendations report to Minister Anthony Roberts calls for the NSW Government to "consider social and affordable housing as essential social and economic infrastructure"².

has strengthened its interest in and advocacy for regional housing solutions in NSW. In May 2021, we formally engaged the Regional Australia Institute ('RAI') to undertake a review of every local government area in regional NSW. Our investigation found that **the Cessnock, Newcastle, and Maitland LGAs are highly ranked localities of concern** when it comes to housing pressures in regional NSW. We have outlined the implications of this needs-assessment in our submission.

We attended a Zoom community workshop on the HRP on 22 February 2022. Our submission is generally in **support of the 15-minute mixed use neighbourhood** principles outlined in the session. We ask for further details to be provided on **commitments to social and affordable housing targets** and the **Urban Development Program**.

Other key asks in our submission call for the **innovative use of publicly-owned land, better workforce accommodation planning, and regulation of short-term rental accommodation**. A summary of our recommendations is included on pages 13 and 14.



¹ Australian Government, Infrastructure Australia. (September 2021, p. 19). *Reform to meet Australia's future infrastructure needs: 2021 Australian Infrastructure Plan.* Retrieved from https://www.infrastructureaustralia.gov.au/publications/2021-australian-infrastructure-plan

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² Fielding, G. (October 2021, p. 5). *Regional Housing Taskforce: Recommendations Report.* Retrieved from https://www.planningportal.nsw.gov.au/regional-housing

Context: LGAs of high housing need

At the population level, regional and rural communities are often home to an ageing demographic which increasingly wants to age-in-place (this is considered best practice and reflected in the Aged Care Royal Commission's recommendation to increase in-home aged care by 80,000 new packages into 2022)³. Downsizers, ex-farmers, and older people in general will need housing which is easy to maintain, affordable, and well-located with respect to key health and social services. The Hunter region is no different; it is anticipated that population growth will be highest in the 65+ year age group in the coming years for the LGAs of Cessnock, Newcastle, and Maitland⁴.

Migration trends during the COVID-19 pandemic have contributed to a deepening regional housing crisis for NSW⁵. Single-parent families and households in mortgage or rental stress are overrepresented in the Hunter, compared to the rest of regional NSW⁶. This is particularly concerning, as the latest *SGS Economics Rental Affordability Index*⁷ found a single-parent family (with one child under five) receiving government parental payments supplemented with casual or part-time work faces "severe to extreme" rental affordability constraints in all parts of the Hunter. A single pensioner aged 65 or older seeking to rent a 1-bedroom dwelling similarly faces "severe" rental affordability constraints in and around Newcastle⁸.

Meanwhile, the proportion of dwellings as social housing stock across Newcastle, Cessnock, and Maitland LGAs is 3.0-6.3% which is relatively high compared to other regional locations. Nonetheless, there are 3,000 people on the general social housing waitlist waiting in excess of 5 years for all dwelling types across these three LGAs⁹.

Due to the above factors (and other parameters outlined in our housing-need report), Cessnock, Newcastle, and Maitland LGAs are ranked third, fourth, and fifth (respectively) out of all regional LGAs in our report on areas of highest housing

³ Royal Commission into Aged Care Quality and Safety. (February 26, 2021). *Final Report - Recommendation 39.* Retrieved from https://agedcare.royalcommission.gov.au/sites/default/files/2021-03/final-report-volume-1 0.pdf

⁴ Shelter NSW in partnership with Regional Australia Institute. (November 2021, pp.18, 19 & 21). *New South Wales Regional Housing Need Report*. Retrieved from https://shelternsw.org.au/wp-content/uploads/2021/11/NSW-Regional-Housing-Need-Report.pdf

⁵ Pawson, H., Martin, C., Thompson, S., & Aminpour, F. (2021, p. 45). *COVID-19: Rental housing and homelessness policy impacts*. ACOSS/UNSW Poverty and Inequality Partnership Report No. 12. Retrieved from https://shelternsw.org.au/wp-content/uploads/2021/11/Covid-19 rental-housing-and-homelessness-impacts-in-Australia-24-Nov.pdf

⁶ Shelter NSW in partnership with Regional Australia Institute. (November 2021, p. 18, 19 & 21). *New South Wales Regional Housing Need Report*. Retrieved from https://shelternsw.org.au/wp-content/uploads/2021/11/NSW-Regional-Housing-Need-Report.pdf

⁷ SGS Economics. (November 2021). *Rental Affordability Index: Key Findings*. Retrieved from https://www.sgsep.com.au/sgs-lab/rental-affordability-index [interactive map]

⁸ Ibid [interactive map]

⁹ Shelter NSW in partnership with Regional Australia Institute. (November 2021, p. 18, 19 & 21. *New South Wales Regional Housing Need Report*. Retrieved from https://shelternsw.org.au/wp-content/uploads/2021/11/NSW-Regional-Housing-Need-Report.pdf

need¹⁰. It is of the view that the most effective way of improving the housing situation in these localities is through the rollout of:

- an extensive social and affordable housing acquirement/construction program,
- Affordable Housing Contributions Schemes or fit-for-purpose and transparent Affordable Housing Planning Agreement Policies,
- mixed use, residential infill strategies targeting specific sites in established towns/cities and satellite villages,
- public land dedicated to non-market housing, and
- tighter regulations on short-term rental accommodation.

Stronger commitment to augmenting social and affordable housing

Unlike the draft *Central Coast Regional Plan 2041*, the HRP does not include affordable housing numeric targets. We feel this is a wasted opportunity by the Department, particularly as we have demonstrated that many LGAs in the Hunter are experiencing a housing crisis.

Affordable housing

The term 'affordable housing' is defined in the NSW planning system as:

Housing for very low income households, low income households or moderate income households, being such households as are prescribed by the regulations or as are provided for in an environmental planning instrument.¹¹

Affordable housing is not necessarily public or community housing ('public' and 'community' housing both come under the umbrella of 'social' housing¹²). Affordable housing can be funded (and delivered) by local Councils, particularly where private development must contribute funds/land/dwellings for the purposes of affordable housing.

Affordable housing is nearly always affordable rental housing. A greater variety of households may be eligible for affordable rental housing than social housing. Indeed, income brackets for affordable rental housing eligibility tends to include key workers such as teachers, nurses, aged care workers, trade apprentices, and other industry workers who are essential to local communities. Providing more housing opportunities for these

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¹⁰ Ibid, p. 6

¹¹ NSW Government. (current version December 1, 2021). *Environmental Planning and Assessment Act 1979 No 203*, s1.4 Definitions. Retrieved from https://legislation.nsw.gov.au/view/whole/html/inforce/current/act-1979-203

¹² NSW Government. (current version November 26, 2021). *State Environmental Planning Policy (Housing) 2021*, Dictionary="social housing provider". Retrieved from https://legislation.nsw.gov.au/view/whole/html/inforce/current/epi-2021-0714

working cohorts is therefore imperative to advancing any region's economic growth goals.

The NSW Department of Planning can and should assist local Councils in scoping out the viability of creating Affordable Housing Contributions Schemes or Affordable Housing Planning Agreement Policies.

The Regional NSW Housing Taskforce initial findings report¹³ acknowledges that using the Department's viability tool for Affordable Housing Contributions Schemes can be cumbersome and that more training for regional planners is required to ensure the tool can be practically used. Additionally, the Department has a ministerial direction and practice note setting out the need for an underlying local Planning Agreement policy to be in place before negotiating any planning agreements¹⁴. It is not known whether specific guidance and resources are provided by the Department to local Councils on crafting policies for Affordable Housing Planning Agreements.

Social housing

The intent of both public and community housing (as subsets of social housing) is to accommodate people on very low, low, and moderate incomes in affordable housing. **Social housing renewal and augmentation is a State responsibility** and in 2022, our ask of the NSW Government in this respect is to:

- 1. Fast track investment in social housing to prevent homelessness and support economic recovery across the state (including in regional areas):
 - a) Build or acquire 5,000 additional units of social housing each year for the next 10 years to address the current backlog and enable an effective response to the growing demand
 - b) Invest \$500 million in an expanded repairs and maintenance program for existing social housing stock. This would include upgrades to inefficient fixtures (water, heating and cooling) and improve the thermal performance of existing social housing stock
 - c) Build three new Youth Foyers in NSW providing integrated housing, education and employment support to vulnerable young people otherwise at risk of homelessness.

In addition to the above, routinely advocates for at least 5% of all dwellings in all LGAs to be social housing.

¹³ Fielding, G. (September 2021, pp. 35 & 36). *Regional Housing Taskforce: Initial Findings Report.* Retrieved from https://www.planningportal.nsw.gov.au/regional-housing

¹⁴ NSW Government. (February 28, 2019). *Ministerial Direction: Environmental Planning and Assessment (Planning Agreements) Direction 2018.* Retrieved from https://www.planning-agreements-2019-06-11.pdf?la=en; NSW Government. (February 2021). *Planning Agreements: Practice note.* Retrieved from https://www.planning.nsw.gov.au/-/media/Files/DPE/Practice-notes/practice-note-planning-agreements-2021-02.pdf?la=en

Recommendations

- Provide more hands-on assistance to local Councils in developing/implementing Affordable Housing Contributions Schemes and Affordable Housing Contributions Policies, and indeed make clear the difference between these two mechanisms in delivering affordable rental housing outcomes
- Include specific affordable housing targets, similar to numeric targets outlined in the draft *Central Coast Regional Plan 2041*
- Strengthen the Plan by making it clear that renewing and increasing social housing stock in the Hunter is a key feature of the Plan through to 2041
- Set a target of at least 5% of all dwellings in each LGA being social housing.

Hunter Urban Development Program ('HUDP')

Similar to the Urban Development Program Committee outlined in the draft *Central Coast Regional Plan 2041*, Shelter is of the view that the various Local Aboriginal Land Councils in the Hunter should be invited onto the HUDP Committee. Further, we are curious to know what bodies/Organisations have been invited to join the Committee and how the Committee membership was decided.

Given the challenges facing the Hunter in planning and delivering well-located, affordable, and quality housing, **a housing affordability roundtable should report to the Committee.** Such a roundtable is proposed in the draft *New England North West Regional Plan 2041*:

The Department... will establish a New England North West Housing Affordability Roundtable with councils, community housing providers, State agencies and the housing development industry to collaborate, build knowledge and identify measures to improve affordability and increase housing diversity¹⁵

We propose a similar function be established to inform the HUDP with invitations to the roundtable extended to the Department of Communities and Justice, Aboriginal Housing Office, and Community Housing Industry Association NSW, among others. A key focus for the roundtable should be the preparation of a joint delivery plan (government, not-for-profit, and private sectors) to meet affordable and social housing targets.

Recommendations

- Invite various LALCs onto HUDP Committee
- Release details on how membership to the Urban Development Program Committee was/is being decided

¹⁵ NSW Government. (2021, p. 64). *Draft New England North West Regional Plan 2041*. Retrieved from https://dpe.mysocialpinpoint.com.au/new-england-north-west-2041

• Establish a subcommittee/roundtable on housing affordability which informs the HUDP and commits to a joint-delivery plan on social and affordable housing.

Mixed use, infill residential development

Shelter supports the goal of mixed use 15-minute neighbourhoods, specifically Strategy 3.1:

Development proposals will need to demonstrate how various employment, commercial, community, recreational and education services will be located within 15-minute walking (urban contexts) and cycling (suburban contexts) trips of housing in residential and mixed-use zones... planning and development controls will permit a greater variety of land uses within neighbourhoods, streets and blocks, even if such uses are not initially proposed by developers within developments

We are further encouraged by Strategy 4.4 the HRP whereby infill versus greenfield targets for new development are laid out for various districts:

District	Infill	Greenfield
Greater Newcastle	80%	20%
Coastal	70%	30%
Hinterland	60%	40%
Central Lakes	60%	40%
Central Hunter	40%	60%
Barrington	30%	70%
Upper Hunter	20%	80%

Linked locality plans, however, do not routinely show infill or mixed use opportunities consistent with the above aspirations in the Plan. **Fifteen and 30 minute passive travel bubbles have not been overlaid on locality maps**, which we assert is a missed opportunity for the community to visualise what walkable/cyclable catchments entail.

We advocate for infill development to be a primary housing and urban renewal option in regional towns and cities. Greenfield estate development has long been on the Americanised trajectory of sprawling, detached, single-storey 'McMansions' with limited footpath infrastructure, heavy car reliance, and no minimum estate-wide targets for universally accessible design. Poorly designed suburban sprawl estates are incompatible with an ageing population, provision of cost-effective infrastructure, and climate change more generally. The lack of diversified housing in regional centres is at odds with ABS

data indicating the number of people per household in regional locations is more conducive to 1-to-2 bedroom dwellings¹⁶.

Our submission to the Regional Housing Taskforce¹⁷ in September 2021 included the recommendation for land use zoning typologies to be reimagined for regional and rural settings, with diminishing prevalence of land zones that promote sprawl in LEPs. In this vein, we believe an action should be included in the HRP to assess the viability of certain land zone typologies (R2 and R5 zones at urban fringes when compared to R1, RU-, and Enviro zones) and increase preference for other land zone typologies (R3 and Mixed Use near commercial cores and employment hubs) in LEPs. This action should specifically mention the role of Local Housing Strategies (under development or review) in auditing land use zone typologies.

Infill development opportunities must be explored in conjunction with Department of Communities and Justice ('DCJ') and community housing providers, and incentives offered to private developers to dedicate affordable rental housing in these infill sites (either through Planning Agreements or Affordable Housing Contributions Schemes).

Recommendations

- Overlay locality maps with 15 and 30 minute travel bubbles
- Incorporate more mixed use, infill investigation areas into locality maps
- Include numeric targets for social and affordable housing properties (with reference to dwelling types/sizes/numbers of bedrooms) in infill, mixed use strategies, to ensure new social and affordable housing stock is not relegated only to greenfield development areas
- Commit to reviewing viability of certain land zone typologies when furthering the objectives of mixed use development whilst cross-referencing the roles and outcomes of Local Housing Strategies.

Publicly-owned land and innovative housing

Similar to the draft *Central West and Orana Regional Plan 2041*, Shelter advocates for inclusion of a specific Strategy or Action point for leveraging publicly-owned land:

Facilitate pilot projects that test... the use of publicly-owned land to test new housing typologies in partnership with industry and community housing providers.¹⁸

¹⁶ Australian Bureau of Statistics. (2011-2016). Census of Population and Housing (Enumerated). Compiled and presented in profile.id, retrieved from https://profile.id.com.au/australia/population?WebID=180

¹⁷ Shelter NSW. (September 2021). Regional Housing Taskforce submission. Retrieved from https://shelternsw.org.au/wp-content/uploads/2021/09/Regional-Housing-Taskforce-Shelter-NSW-submission.pdf

¹⁸ NSW Government. (2021, p. 50). *Draft Central West and Orana Regional Plan 2041*. Retrieved from https://dpe.mysocialpinpoint.com.au/central-westorana-2041

We note Strategy 4.3 of the HRP seeks to:

Support community driven innovative housing solutions, such as prefabricated and manufactured housing, 3-D printed housing, and tiny houses.

We are of the view that **broader examples of innovative non-market housing** could be touted in the Plan.

The NSW Government's *Local Government Housing Kit* contains many case studies on innovative, non-market housing approaches¹⁹ such as the 'Homes for Homes' initiative which relies on donations from property sales in a community to fund affordable housing projects²⁰. There is also the ACT Suburban Land Agency's rent scheme whereby purchase of land is not required in order to build a home on newly available allotments²¹. In more recent times, Bellingen alongside Kempsey and Port Macquarie-Hastings Councils have established a community land trust to operate as a not-for-profit organisation, providing housing potentially through co-ownership or a 99-year lease model²².

Recommendations

• Include a Strategy or Action point which makes specific reference to leveraging the use of publicly-owned land for non-market innovative housing.

Workforce accommodation and growth

In boom-and-bust resource economies, short-term rental platforms such as Airbnb and Stayz impact the local rental market of regional and rural towns as mining operatives and key industry employers rely on short-term rentals to meet their accommodation needs. We believe greater scrutiny of DA proposals by local and state planners on the social impacts of resource industry proposals for accommodating DIDO/FIFO workforces is therefore required.

Special Activation Precincts and Renewable Energy Zones will add significant strain to councils when attempting to plan and accommodate new and temporary industry workforces. Physical and human resources may need to be deployed to the Hunter (planners, building certifiers, and other assessors).

The draft *Central West & Orana Regional Plan 2041* on exhibition at the same time as this Plan includes an Action which should be adapted for inclusion into the HRP:

¹⁹ NSW Department of Communities and Justice ('DCJ'). (2019). *Local Government Housing Kit: Module 5 case studies and resources*. Retrieved from https://www.facs.nsw.gov.au/resources/nsw-local-government-housing-kit/chapters/Local-Government-Housing-Kits-Full-Kit-and-downloadable-modules

²⁰ Ibid, p. 15

²¹ Ibid, p. 6

²² Housing Matters Action Group. (n. d.). *Current Projects.* Retrieved from https://www.housingmatters.org.au/current-projects/

Investigate options to ensure new public and private infrastructure, mining and other major employment-related projects plan for workforce accommodation during the lifecycle of the project, by identifying:

- the workforce required and their accommodation needs
- when the workforce will come to the region and how long they will stay
- housing, health, education and commercial needs for the workforce and their families
- how the project will impact tourism and how this impact will be addressed
- housing options to support the surrounding centres and community for the lifetime of the project, including construction and operational phases
- opportunities to retain project-related housing as community managed assets in the long term
- opportunities for new projects to provide a financial contribution towards the provision of key worker accommodation²³

Recommendations

- Recognise the need for State-supplied additional resources to be delivered to councils in adequately administering new and temporary workforce accommodation
- Include an Action in the Plan outlining matters for consideration when determining the social impact of new and expanded industry projects.

Short term rental accommodation ('STRA')

We are pleased to see an acknowledgement in the Plan that STRA places pressure on housing stock and affordability:

Strategy 4.6

Planning for residential housing should be done while also considering demand for hotels, motels and short-term rental accommodation. The visitor economy requires affordable housing for the workforce. Residential housing can be taken up by short-term rental accommodation if demand for tourist accommodation is not considered.

Short-term letting platforms such as Airbnb are marketed toward tourists who can afford (or are willing) to pay a higher price for short term accommodation than residents who are seeking temporary housing. This is evident in the NSW Department of Planning's 2017 Option Paper on regulating short term holiday letting, which went on to form the basis of the STRA provisions in the Affordable Rental Housing SEPP and now the consolidated *Housing SEPP 2021*.

NSW Government. (2021, p. 53). *Draft Central West & Orana Regional Plan 2041*. Retrieved from https://dpe.mysocialpinpoint.com.au/central-westorana-2041

Increasingly in Australia, the type of STRA available on Airbnb is whole-house conversions of investment properties²⁴ – presumably from the long-term rental market or owner-occupied premises following a sale to a property investor. Domestic tourism during COVID-19 has significantly increased in many regional towns and locations. The lure of higher-profits per week in converting a dwelling to short-term rental accommodation through easy-to-use platforms such as Airbnb has diverted a lot of long-term rentals from the private rental market. This has demonstrably been the case in the regions of Shoalhaven, North Coast, Snowy River, and the Hunter, to name a few:

Region/Town	Number of whole-house STRAs listed on Airbnb – Q1 2019 ²⁵	Number of whole-house STRAs listed on Airbnb – March 2021 ²⁶	Change in rental vacancy rates between March 2019-2021 ²⁷
Shoalhaven	<4000	4720	-1.8 (2.6 to 0.8 for South Coast)
Byron Bay	<2000	2782	-0.8 (1.1 to 0.3 for Northern Rivers)
Cessnock	<900	1012	-1.0 (1.7 to 0.7 for Hunter)
Snowy River	<500	891	-2.3 (2.9 to 0.6 for South East)

Whilst the NSW Government has developed a planning framework for somewhat regulating short-term rental accommodation, this legislation does not go far enough particularly in light of domestic tourism trends. We do commend the Government's creation of a Code of Conduct for hosts and guests, as well as the formulation of STRA state-wide register. However, we note that it is not explicitly stated on public-facing NSW Fair Trading²⁸ and NSW DPIE²⁹ websites what the penalties will be for lack of compliance with the Code and not listing properties on the register. We are concerned that the combination of generous STRA planning rules (toward hosts and property investors) and the lack of information on enforcement measures and lack of committed local enforcement resources, will result in regulation which is not implemented across the state. This regulatory failure would exacerbate the gap in addressing known social, economic, and environmental negative externalities associated with the majority of STRA.

With reference to our assertion that "generous STRA planning rules" exist for hosts, we note that regional councils have to opt-in to the 180 day annual cap for regulating wholehome STRAs through a planning proposal, and the cap can be no lower than 180 days (potentially excluding Byron Bay). The justification for the 180-day arbitrary lower

²⁴ Sigler, T & Panczak, R. (February 13, 2020). *Ever wondered how many Airbnbs Australia has and where they all are? We have the answers*. Retrieved from https://theconversation.com/ever-wondered-how-many-airbnbs-australia-has-and-where-they-all-are-we-have-the-answers-129003

²⁵ AirDNA. (n.d.). Vacation Rental Data. Retrieved from https://www.airdna.co/

²⁶ Australia listings. (March 9, 2021). *Inside Airbnb*. Retrieved from http://insideairbnb.com/get-the-data.html

²⁷ REINSW. (April, 2021). *Residential vacancy rate*. Retrieved from https://www.reinsw.com.au/Web/Members/Property data/Vacancy Rates Survey.aspx

²⁸ NSW Fair Trading. (n.d.). Changes to laws for short-term rental accommodation. Retrieved from https://www.fairtrading.nsw.gov.au/about-fair-trading/legislation-and-publications/changes-to-legislation/changes-to-short-term-rental-accommodation

²⁹ NSW DPIE. (n.d.). Short Term Rental Accommodation (STRA). Retrieved from https://www.planningportal.nsw.gov.au/STRA

threshold has not been communicated to the public. **Opting-in to a day cap is an unnecessary administrative process for local councils to go through.** With keen regard to the domestic tourism boom, all LGAs should be opted into the 90-180 day cap for non owner-occupied hosted STRA without needing to request this through a planning proposal.

In the longer term, the preference for day cap mechanisms to limit non-hosted STRAs in the legislation should be phased out. Research internationally³⁰ has shown that annual day-caps for STRA use are less efficient in returning dwellings to the long-term rental market than policies limiting the total number of STRAs per suburb. We suggest that the total number of non owner-occupied hosted STRAs should be capped per LGA in accordance with local studies into the maximum allowable number of STRAs that can occur without adverse impact on the long-term rental market in each location. This approach is being investigated in Tasmania³¹, as state government and local councils try to address the housing crisis in Hobart and other high amenity locations as a result of Airbnb and other holiday accommodation platforms.

Furthermore, total STRA volume caps for LGAs should be guided by density caps (e.g. no more than *x* number of non-hosted STRAs per *y* square metres/suburb), to ensure hollowing out of high amenity neighbourhoods for STRA use does not occur. Local research and evidence for density caps will be required. **The sociospatial disadvantages of STRA use are well documented globally**³², **in that local residents are generally pushed further afield from their areas of employment and community facilities**, with significant burdens on planning for transport, open space, schools, and other physical and social infrastructure. Density caps that are tipped more favourably to STRA uses in certain neighbourhoods will allow better infrastructure planning, more creative precinct planning, and more holistic leisure experiences in line with tourism goals of cities and regions.

The concept of STRA volumes and density caps harmonises well with the NSW Government's apparent desire to foster more diverse neighbourhoods, and so it is hoped these recommendations will be seriously considered.

Recommendations

 State on easy-to-access webpages and other media content of NSW Fair Trading and NSW DPE what penalties (number of warnings, maximum monetary fines, court

³⁰ Frenken, K & Schor, J. (2019). Putting the sharing economy into perspective. In *A research agenda for sustainable consumption governance.* Edward Elgar Publishing; Temperton, J. (February 13, 2020). *Airbnb has devoured London – and here's the data that proves it.* Retrieved from https://www.wired.co.uk/article/airbnb-london-short-term-rentals

³¹ Tasmania Government. (n.d.). *Tasmanian Planning Reform: Short stay accommodation*. Retrieved from https://planningreform.tas.gov.au/short-stay-accommodation-act-2019

³² Shabrina, Z, Arcaute, E & Batty, M. (2021). Airbnb and its potential impact on the London housing market. *Urban Studies*. Retrieved from https://doi.org/10.1177/0042098020970865

Cocola-Gant, A & Gago, A. (2019). Airbnb, buy-to-let investment and tourism-driven displacement: A case study in Lisbon. *Environment and Planning A: Economy and Space*. Retrieved from https://doi.org/10.1177/0308518X19869012

- proceedings) are associated with lack of compliance with STRA planning reforms, including not listing properties on the register, not adhering to Code of Conduct, not following Exempt development standards, and breaching day-caps
- Fund and resource through joint regional organisations or one-on-one liaison with local councils – compliance officers for implementing STRA reforms, particularly in the first two years of full regulatory commencement
- Remove the administrative step of requiring Councils to self-nominate for inclusion into the 180 day regulatory cap for non-hosted STRA
- Expand legislative reforms on STRA by pivoting to reliance on volume and density caps rather than annual day caps (e.g. no more than *x* number of non-hosted STRAs per *y* square metres/suburb), to ensure hollowing out of high amenity neighbourhoods for STRA use does not occur. Local research and evidence for density caps will be required.

Summary of recommendations

The recommendations peppered throughout this submission are collated below. Shelter NSW recommends the Department of Planning:

- Provide more hands-on assistance to local Councils in developing/implementing Affordable Housing Contributions Schemes and Affordable Housing Contributions Policies, and indeed make clear the difference between these two mechanisms in delivering affordable rental housing outcomes
- Include specific affordable housing targets, similar to numeric targets outlined in the draft *Central Coast Regional Plan 2041*
- Strengthen the Plan by making it clear that renewing and increasing social housing stock in the Hunter is a key feature of the Plan through to 2041
- Set a target of at least 5% of all dwellings in each LGA being social housing
- Invite various LALCs onto HUDP Committee
- Release details on how membership to the Urban Development Program Committee was/is being decided
- Establish a subcommittee/roundtable on housing affordability which informs the HUDP and commits to a joint-delivery plan on social and affordable housing
- Overlay locality maps with 15 and 30 minute travel bubbles
- Incorporate more mixed use, infill investigation areas into locality maps
- Include numeric targets for social and affordable housing properties (with reference to dwelling types/sizes/numbers of bedrooms) in infill, mixed use strategies, to ensure new social and affordable housing stock is not relegated only to greenfield development areas

- Commit to reviewing viability of certain land zone typologies when furthering the objectives of mixed use development whilst cross-referencing the roles and outcomes of Local Housing Strategies
- Include a Strategy or Action point which makes specific reference to leveraging the use of publicly-owned land for non-market innovative housing
- Recognise the need for State-supplied additional resources to be delivered to councils in adequately administering new and temporary workforce accommodation
- Include an Action in the Plan outlining matters for consideration when determining the social impact of new and expanded industry projects
- State on easy-to-access webpages and other media content of NSW Fair Trading and NSW DPE what penalties (number of warnings, maximum monetary fines, court proceedings) are associated with lack of compliance with STRA planning reforms, including not listing properties on the register, not adhering to Code of Conduct, not following Exempt development standards, and breaching day-caps
- Fund and resource through joint regional organisations or one-on-one liaison with local councils – compliance officers for implementing STRA reforms, particularly in the first two years of full regulatory commencement
- Remove the administrative step of requiring Councils to self-nominate for inclusion into the 180 day regulatory cap for non-hosted STRA
- Expand legislative reforms on STRA by pivoting to reliance on volume and density caps rather than annual day caps (e.g. no more than x number of non-hosted STRAs per y square metres/suburb), to ensure hollowing out of high amenity neighbourhoods for STRA use does not occur. Local research and evidence for density caps will be required.

From: DPE PSVC Hunter Mailbox To: Cc: - Submission on Hunter Regional Plan 2041 Friday, 11 March 2022 11:46:22 AM

Date:

Attachments: image005.jpg image006.jpg

- Hunter Regional Plan - March 2022.pdf

Dear Hunter Planning Team,

was advised on 1 March by to ensure our submission on the draft Hunter Regional Plan is submitted to this mailbox by COB 11 March.

Please see attached our submission and thank you again for the timeframe extension. Kind regards



acknowledges the traditional custodians of this land. We acknowledge the deep and lasting connection of Aboriginal and Torres Strait Islander Australians as the custodians of our Country. We pay our respects to the Gadigal People of the Eora Nation, past and present, on whose traditional land we work. Furthermore, I acknowledge and pay my respects to the people of the Wiradjuri Nation, being the land upon which I work in Orange, NSW. Always was, always will be, Aboriginal land.



DRAFT HUNTER REGIONAL PLAN 2041

March 2022

Introduction

appreciates this opportunity to provide feedback on the Draft Hunter Regional Plan 2041 (DHRP2041).

We were pleased to have attended and provided input to both the Lower and Upper Hunter DHRP2041 webinar consultation sessions. The Department of Planning and Environment (DPE/the Department) are to be commended for this phase of consultation, including consultation ahead of the DHRP2041 being released with local government and key stakeholders.

is the Hunter Region's peak	business policy and advocacy group, representing
more than 3,700 member and affiliate busine	sses and industries across all sectors, from SMEs to
large corporations and organisations. We are	connected to the business community statewide and
nationally through affiliations with	and the
Furthermore,	networked and affiliated with 20 local Chambers of
Commerce across the Hunter region further e	nhancing our reach, connectivity and engagement with
the business sector.	

We believe our role is vital to help Hunter businesses succeed through championing comprehensive government and private enterprise policies that make room for entrepreneurialism, growth and diversification of modern Hunter businesses who have faced extraordinary challenges over the past two or three years. Through providing open access to business policy, thought leadership and strong advocacy we know we can assist in positioning this region for prosperity, to strengthen existing and generate new jobs, social wealth, and a better community in which to live.

General Feedback

believes government achieves best policy outcomes for regional development when its strategies, plans and documents cross-reference related works in other agencies.

The DHRP2041 clearly references alignment with the Greater Newcastle Metropolitan Plan and, in parts, additional linked corporation plans such as the Lower Hunter Water Plan 2040. Overall, though, Business Hunter encourages additional strategic alignment across government agencies that will ultimately help deliver the final Hunter Regional Plan 2041 (Final Plan).

For business, strategic alignment and sequencing of government planning provides increased certainty and assurance that their own business investment, planning and growth strategies can be fully and comprehensively informed by government policy, no matter which government touchpoint they access for advice or support.

The DHRP2041 does provide relative flexibility for the region with key priorities such as infrastructure, connectivity, supporting growth industries and renewing small business opportunities all featuring.

If realised these broad principles can strengthen business and commercial presence in communities which will in turn, assist in realising the outcomes across a number of the Plan Objectives.

COVID-19 and the overturning of long-established business and consumer behaviours that has resulted, shows that localised commerce infrastructure requires support and targeted reinvestment to restore confidence in the business and commercial sectors is essential for achieving and maintaining a broadly diversified economy.

Overall, a commitment to including strong neighbourhood business revitalisation along with CDB revitalisation strategies presents an enormous opportunity to send the Hunter region – a region of active suburbs, villages and regional cities, with a globally-recognised capital in the Newcastle CBD – on a promising journey of connectivity, sustainability and new economic growth.

We note and congratulate the government for developing a comprehensive draft Plan. We also note that if adopted, the Plan will demand a process to identify and prioritise the amibitions it seeks to deliver. We doubt there are departmental resources immediately available to concurrently deliver across the respective Objectives. To assist, would welcome the opportunity to work with DPE to build a strategy around the allocation of resources to meet commercial and industrial objectives, and resulting business outcomes to achieve business and economic growth across the Plan.

Feedback related to business and commercial objectives

Objective One: Diversifying the Hunter's mining, energy and industrial capacity

1. supports energy source, supply and transmission diversification and understands that, at least domestically, demand for thermal coal will decline as a source of residential and increasingly commercial energy over the next 10-20 years.

The business opportunities presented by transitioning coal mining economies are no longer contestable. Alongside the diversification and growth of new energy economies, agrees that mining, including coal for the foreseeable future, is a significant source of direct and indirect jobs and remains a strong contributor to much of the Hunter's prosperity. Acknowledging that coal mining is entering what we anticipate will be a managed transition phase, its resource still has currency in local and to a more significant extent, global markets, well beyond 2040.

Because of this, seeks to reinforce the benefit of including previously approved government policies on coal, such as the Strategic Statement on Coal Mining and Exploration. Where existing mining and resource plans and strategies exist and are current, these should retain reference to maintain synchronised energy transition policies that will come from the approval and execution of the final Hunter Regional Plan 2041.

- 2. We recognise the authors of the DHRP2041 could not have foreseen the geopolitical crisis unfolding across the northern hemisphere since February 2022. These recent events and their potential to focus on global energy security, supply and resources more broadly, means the Hunter must be honest and flexible in its conversations around the decarbonised energy usage and export journey. We must keep a short-term view of our own national energy sovereignty and security, and the temperament of geopolitical relationships in our own region. Here, we must be a nimble region and ensure our business, commerce and industry remains ready to respond to the needs of our nation and our region in supply of affordable energy. We must acknowledge that we are a national powerhouse. We understand the added complexity of these circumstances, particularly that we must also focus on the short- mid- and long-term plans and actions to support the trajectory towards renewables and decarbonisation. The momentum must be maintained towards a net zero economy for Australia. We know the Hunter has the distinct capacity above other regions particularly in the skills and business ecosystems we have in place, to lead net zero nationally.
- 3. Alongside this, a balanced transition that includes preparing businesses for uptake of new energy must be cognisant of reliability and affordability of supply.

Given the rocky twenty-four months of business trade and confidence that have preceded the current global uncertainties, many businesses are currently operating at a net negative budget position. They are now attempting to replenish their stockpiles and cash reserves that were depleted through the pandemic. The implementation of the rapid transition of energy use must include incentives for businesses to offset and then convert their power consumption and sourcing and enable them to play their part in the diversification of new energy sources and supply.

4. Policy around post-mining land use must be as flexible and accommodating as it is opportunistic for post-mining spin-off business and growth. fully supports the principles of the circular economy as one of the most exciting business growth and economic diversification opportunities on offer in the Hunter region. believes that site rehabilitation must recognise the relative position of built infrastructure in all forms and be allowed to accommodate planning for safe, sustainable needs-based redevelopment; from nature reserves through to new industrial precincts and hubs to drive circular economies and lifestyles at scale. One of the noted strengths of the DHRP2041 was its apparent flexibility in outcomes; in practical terms, the Final Plan must allow former mining sites to be assessed and granted a renewal strategy that complements economic growth suitable to the needs of the communities that surround it – not a "one principle fits all" approach.

Objective 2: Ensure economic self-determination for Aboriginal communities

1.	supports robust and well-consulted policy and implementation through the final
	Hunter Regional Plan 2041 that clearly references the relevant LALC priorities for economic self-
	determination and growth according to the priorities and ambitions for cultural, business and
	trade plan actualization, and the principles of OCHRE.

would additionally like to see a joint statement from the LALCs and the NSW Indigenous Chamber of Commerce (NSWICC), alongside the strategic land-use and environmental resource management Strategies in the DRHP2041 to underpin the Final Plan. It is further recommended that consultation and implementation be guided by the University of Newcastle (through the Office of Indigenous Strategy and Leadership), TAFE NSW and the Wollotuka Institute, all of whom have robust and well-researched approaches to achieving Aboriginal participation and success in education, training and business objectives. By doing so, DPE will inform its Final Plan to meet objectives for First Nations people that ensure cultural economic priorities are achieved through an indigenous-focused, commercial evidence base.

2. Many strategies and actions identified to achieve objective 3 rely on Aboriginal commercial success achieved by Aboriginal agencies having to reach *into* the knowledge base and objectives of the Department, rather than the Department reaching *out* to these organisations and communities to identify *their* practical principles. encourages the latter in practice when the Final Hunter Regional Plan 2041 is released. This will aid fuller self-determination of Aboriginal business and economic futures.

Objective 3: Create a 15-minute region made up of mixed, multi-modal, inclusive and vibrant communities.

1. has previously stated the importance of alignment with existing, and current strategies and plans in the DRHP2041 and its final version. Objective 3 talks at length of the 15-minute region which is exciting. It also presents an opportunity for DPE to strengthen its intragovernmental alignment with other agency strategies to achieve the Plan.

Strong emphasis has been placed on multi-modal civic interactions and mobility. Reduction of car dependency is critical to successful multi-modal commercial activation across a 15-minute region, yet there is little identification of implementing the plan to redesign high street areas (be that a large CBD, or smaller commercial precincts). If car-use reduction is to be achieved, consolidated reform and revitalisation of the public transport offerings across the region must be prioritised and outlined clearly in the final Plan. This is important to businesses and commerce for an important reason – funding and maintaining amenity and access for parking is a cost burden. In some instances, parking, or lack thereof, is a disincentive to commercial trade in urban centres

centres. Many urban centres are implementing low-quantum, high-cost car parking strategies which, if reassessed, could aid in reducing congestion and boost public transport usage; the hop-on, hopoff accessibility to commercial areas and high streets is appealing. It builds walking patronage at the micro level, and overall urban/high street economic vibrancy at the macro. Yet the planning and implementation of easy-uptake public transport projects are missing from the DRHP2041. wrote previously about the revitalisation of local neighbourhood economies – strengthening and easing access and fluidity of a comprehensive needs-based, commercial and community activating public transport plan will assist in achieving the 15-minute region by incentivising car-use for intraregional transit, rather than inter-neighbourhood commuting. As referenced earlier, believes the DHRP2041 should develop, for its final version, a strong statement of support for planning for and rejuvenation of village high streets and the corner store (local neighbourhood) economy. Doing so will not only diversify economic outputs of our region, it will also help virtual, digital or hybrid companies and employees adopt a "15-minute commute" mentality that revolves around their neighbourhood first. It will promote a return or reinstatement of new business activity. By championing digital infrastructure planning along with physical, the Department can achieve a growing culture of businesses and employees on a walking commute for services when working from home, while retaining the 15-minute public transport commute to the commercial office when required, using cars for private transit only when impeded of travelling intra-region. Overall, successful implementation of the 15-minute region approach must acknowledge the role of, and DPE's requirement to work with, local governments to achieve activated urban and suburban commercial precincts. Objective 4: Plan for "Nimble Neighbourhoods", diverse housing and sequenced development. is a partner in the and supports the objectives and submissions of our fellows in this forum including the

Particularly to advocacy is the relatively new realisation that diverse housing development and availability impacts business and commercial growth for the Hunter. Housing shortages are not necessarily a new phenomenon. Yet, over the past eighteen months, there has appeared a crucial point of crisis across all scales of housing access and affordability. At one extreme, workers are increasingly squeezed out of housing affordability in areas close to their place of employment (countering the objectives of the 15-minute region and car use dependency at one end, gross housing inequality at the other), to the other, our research shows that the

"advantages" of relocating to our regional from larger metropolitan areas throughout COVID-19 for housing affordability and lifestyle reasons is being drowned out by ballooning house prices unmatched to wage and salary growth in this area to match metro-cities. We are witnessing workers turning down roles as they unable to find and secure affordable and convenient housing in proximity to the workplace.

We support diverse housing developments that are reflected in many of the DHRP2041 strategies and actions, yet fully support the HPA ask that a \$500M Enabling Infrastructure (Unlocking) Fund be included in the Final Plan to aid the government and housing developers, from Compass Housing to the private sector, achieve the diversity objective outlined in the DHRP2041.

Enabling a diverse housing development program to commence as a priority in the Hunter will help DPE achieve its signaled benchmarks of business and commercial growth, agricultural business diversification and a rejuvenated visitor economy. Compass Housing has produced a comprehensive, solutions-based approach to social housing and the HPA has worked together to produce a whole-of-region policy, planning and investment strategy for government to meet the overall housing shortfall across social, affordable and diverse housing needs. Both are supported by Business Hunter and should be closely considered by DPE.

Objective 6: Reach net zero and increase resilience and sustainable infrastructure

encourages implementation of the final Hunter Regional Plan 2041 to embrace existing regional infrastructure and plans that, if included, will enable net zero economies of scale and encourage sustainable infrastructure to drive net zero.
The NSW Government is aware of plans by the Port of Newcastle, AGL, Snowy Hydro 2.0 and most recently Orica's partnership with Origin, to develop and execute strong, large-scale net zero projects across the region. also welcomes the NSW Treasurer's recent announcement of more than \$100B in expressions of interest in projects within the Hunter-Central Coast Renewable Energy Zone (REZ). Through engagement with our business partners, we know that beyond the big-end projects, many smaller scale productive renewable projects are in the pipeline to support the REZ, the Hydrogen Hubs and large-scale developments. What would like to see is DPE and broader NSW Government financial support to fast-track feasibility and EOI and turn private investment appetite in the REZ into tangible, strategic projects as efficiently as possible. Prioritising the implementation and execution of the REZ will realise our region's potential to diversify our business and commercial identity with confidence.

2. Welcomes the integration of the NSW Climate Policy Framework along with its Energy and Electricity Roadmaps. We support our regional partners who have developed the first Hunter Hydrogen Roadmap, aimed at guiding traditional energy production towards a managed net zero future. We are strongly aligned with the NewH2 Hunter Hydrogen Technology Cluster and continue our strategic work with that and other energy agencies and committees in the Hunter to ensure that net zero economies will produce and realise new business and industrial opportunities for our region.

Objective 7: Plan for business and services at the heart of healthy, prosperous and innovative communities

references previous comments on local commercial revitalisation in considering this objective. We agree in a purpose-driven approach to high-street renewal to meet localized commercial objectives as well as diversity of business practices that meet varied customer needs across the accessibility spectrum of in-commerce, click and collect, and home delivery markets. Recent global contractions and pressures on business have placed diversity of business operations, accessibility and customer service in a new and different perspective.

Workplace and worker flexibility makes the requirement of town centre economies to be more flexible more vital for renewal, growth and sustainability. DPE planning must accommodate a 24-hour economy across the region to meet the transient and diverse workforce and business ownership communities that exist in renewed commercial ecosystems.

By encouraging 24-hour economies where fit for purpose, the DPE is also supporting businesses operating in multi-modal work environments to access goods and services, and care for family members (like childcare) at times that suit their mode of business operations. In consideration of these elements directly and indirectly achieve a stronger 15-minute region Strategy, planning mechanisms must be conscious of mitigating the impacts at the land use interface at zoning and development boundaries. If this is not managed correctly and the true ambition of communities is not realized, the concepts embodied on Objective 7 will be compromised and risk failure.

Conclusion

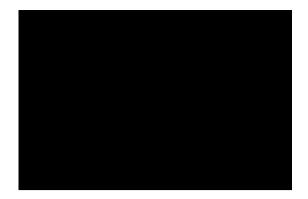
would welcome further engagement and consultation on this submission, particularly relating to its practical implementation and the prioritisation of delivery across the Objectives.

We also appreciate intentions of the Plan to put the region in a best place to accommodate community and business growth however, we recognise that often whilst planning document in and of themselves do not impede progress, the steps in implementation are often difficult, fractured and contentious. Being aware to the impediments that may arise such as conflicts at the land use interface – across all usages and sectors, will help determine if the Plan will realise on its Objectives or have a compromised output because these issues were not fully contemplated and understood.

On this basis, submits our comments with the open-ended offer to continue to work supportively and constructively with DPE to assist and guide outcomes for business and commerce that will smooth the implementation of the Final Plan.



From: To: Cc: Subject: Date: Attachments:	DPE PSVC Hunter Mailbox - DRHP2041 Friday, 11 March 2022 11:50:06 AM image001.png image002.png image003.png image004.png image005.jpg
11 March 2022, We look forward	the extension offered by the Department to please find attached our submission to the Draft Plan for your consideration. It to further discussion as the final plan is developed. If you have any questions on please don't hesitate to contact me directly.
	. It is confidential to the named addressee and t and/or legally privileged information. No-one else may read, print, store, copy, forward or act in reliance on trachments. If you receive this email in error, please call us on
	. It is confidential to the named contain copyright and/or legally privileged information. No-one else may read, print, store, copy, ance on all or any of it or its attachments. If you receive this email in error,



11 March 2022

Department of Planning and Environment Planning and Assessment

Email: hunter@planning.nsw.gov.au;	
Attention:	
Dear Caracter	

Submissions on the draft Hunter Regional Plan 2041

Thank you for the opportunity to comment on the *draft Hunter Regional Plan 2041* (**Plan**) and for providing the Environment Protection Authority (**EPA**) with an extension to 11 March 2022 to provide its submission.

The EPA is involved in the Region as the regulatory authority for numerous scheduled activities and through the Williamtown Special Activation Precinct.

The EPA would appreciate the opportunity to engage with the Department of Planning and Environment (**DPE**) regarding the new planning pathways contemplated in the Plan that may impact on the EPA's regulatory responsibilities under the *Protection of the Environment Operations Act 1997* and *Contaminated Land Management Act 1997*. For example, there is a risk that the commitment to a 5 day gateway determination may mean that the EPA is not provided with adequate time to consider and comment on planning proposals, leading to poor outcomes for proponents and a lack of delivery of NSW Government policy and regulatory responsibilities.

The EPA also seeks to ensure that it is involved in the Place Delivery Group (**PDG**), where the PDG's activities may impact upon the EPA's regulatory role. I note that this and the above issue are common between this plan and the *draft Central Coast Regional Plan 2041*, so one meeting to discuss both sets of issues may be most appropriate.

Detailed comments are at **Appendix A**. Should you require any further information, please contact



Appendix A – Detailed Comments on the Plan

Planning Pathways

The EPA seeks clarification regarding several new planning pathways endorsed in the Plan.

5 Day Gateway Determination Commitment

The EPA currently provides comment on proposed activities which are likely to intersect with its regulatory responsibilities. This allows the NSW Government to meet its regulatory obligations and allows proponents to have a clear understanding of all their responsibilities early in the process. This is an important principle which will need to be maintained in any proposed changes to the process.

The Plan commits to gateway determination in 5 working days for planning proposals in precincts where certain criteria are met (**Commitment**).

If, consistent with the *LEP Making Guideline 2021* (**Guideline**), the DPE's intention is that agency consultation will occur in the pre-lodgement phase of a planning proposal, the EPA understands that this will maintain the principle of allowing the EPA to comment on proposed activities which are likely to intersect with its regulatory responsibilities. For the avoidance of doubt, the Plan should be amended to reference the pre-lodgement consultation framework set out in the Guideline and Attachment B to it.

However, if DPE's intention is that the EPA will first be consulted regarding planning proposals at the gateway determination stage, the EPA's position is that a 5 working day timeframe is inadequate. This timeframe is insufficient for the EPA to provide meaningful comments in response to a planning proposal.

Therefore, if agency involvement is sought to occur first at the gateway determination stage, the EPA requests that an additional exception to the Commitment at p.90 of the Plan be inserted in the following terms:

"Planning proposals in precincts that satisfy the following criteria will be given an accelerated assessment, with an intention for a gateway determination to be issued by the department in 5 working days for land*: ...

· except where:

- the planning proposal relates to land currently used for an activity identified in Schedule 1 to the *Protection of the Environment Operations* Act 1997, and/or
- 2. the planning proposal will, or is likely to, result in residential uses and / or other sensitive land uses being placed in proximity to:
 - a. activities identified in Schedule 1 to the *Protection of the*Environment Operations Act 1997, and/or
 - b. notified or regulated contaminated sites."

Place Delivery Group

The Plan describes that place strategies will be overseen by a Place Delivery Group (**PDG**) which will have a focus on streamlining planning pathways.

The EPA understands that the PDG will include representation from relevant public authorities. The EPA should be included in the PDG (or otherwise consulted), where it is considering place strategies that intersect (or have the potential to intersect) with activities the EPA regulates.

Air Quality and Odour

The Plan encourages actions that will assist in enhancing air quality and reducing the health impacts of air pollution. However, the Plan could be strengthened by implementing relevant policies and guidelines and addressing the odour challenges facing the Hunter Region (**Region**), as follows:

Page	Objective / part	Proposed amendment
52	Objective 6: Reach net zero and increase resilience and sustainable infrastructure	Insert a strategy for the enhancement of air quality in the Region in accordance with the NSW Clean Air Strategy 2021–2030 (DPE, 2022). Insert a reference to the Local Government Air Quality Toolkit (EPA) to assist local governments in the Region to manage air quality at existing premises and to engage in strategic planning which mitigates the air quality impacts of proposed development.
58	Objective 8: Build an inter- connected and globally focused Hunter	Consider the potential air quality impacts resulting from road development and the need to implement mitigation measures to protect sensitive receivers.
52	Objective 6: Reach net zero and increase resilience and sustainable infrastructure: Air quality and transport emissions	Include a new strategy for the minimisation of odour impacts from intensive agriculture by reference to the Technical framework for Assessment and management of odour from stationary sources in NSW (Department of Environment and Conservation, 2006) and Technical notes: Assessment and management of odour from stationary sources in NSW (Department of Environment and Conservation, 2006).
103	District Planning Priorities: Barrington	Include consideration of the likely odour impacts resulting from the growth of the poultry industry in Barrington by reference to the <i>Technical framework for Assessment and management of odour from stationary sources in NSW</i> (Department of Environment and Conservation, 2006) and <i>Technical notes: Assessment and management of odour from stationary sources in NSW</i> (Department of Environment and Conservation, 2006).

Noise

While the Plan identifies various impacts on the "amenity" of residents, it does not expressly identify the noise impacts on sensitive receivers likely to result from some categories of development.

The EPA recommends the following amendments to strengthen the Plan's consideration of noise impacts in the Region:

Page	Objective	Proposed amendment
32	Objective 3: Create a 15 minute region made up of mixed, multi-modal, inclusive and vibrant local communities	The EPA is concerned that strategy 3.2 fails to protect sensitive receivers from noise impacts and proposes its removal or amendment as follows: "Any minor impacts such as noise, car parking or environmental disturbance can be should be appropriately managed but should not be considered a barrier".
		This Objective should reference the <i>Noise Guide for Local Government</i> (EPA, 2013) to encourage councils to adopt strategic planning measures to mitigate the noise impacts of development.
53	Objective 7: Plan for businesses and services at the heart of healthy, prosperous and innovative communities	The Plan encourages the expansion of the 24-hour economy. It should consider the noise impacts likely to result from this, particularly given the Plan's focus on mixed use development, which will see residential use in proximity to commercial premises. Amend strategy 7.3 as follows: "councils should balance the needs of residents, including for protection from adverse noise impacts, with economic benefits".
58	Objective 8: Build an inter- connected and globally focused Hunter	This objective should consider potential noise impacts resulting from road and rail development by reference to the NSW Road Noise Policy (Department of Environment, Climate Change & Water, 2011) and Rail Infrastructure Noise Guideline (EPA, 2013), respectively.
71	Greater Newcastle: Regionally significant growth areas: Broadmeadow growth area	Include consideration of potential noise impacts resulting from the entertainment precinct proposed at Hunter Park.
75	Greater Newcastle: Regionally significant growth areas: National Pinch Point Growth Area	The Plan states that greenfield areas close to the "pinch point" (i.e. the convergence of national road and rail routes located between Hexham and Buchanan) have experienced rapid growth over the last decade.
		The Plan should acknowledge that future development should seek to mitigate adverse noise impacts on sensitive receivers close to the "pinch point" by reference to the <i>Rail Infrastructure Noise</i>

Guideline (EPA, 2013) and the NSW Road Noise
Policy (Department of Environment, Climate
Change & Water, 2011).

Water

The Plan identifies some water quality challenges facing the Region. However, the Plan's discussion of these challenges could be strengthened by endorsing the implementation of key water quality policies and guidelines. To that end, the EPA proposes the following amendments:

Page	Objective	Proposed amendment
45	Objective 5: Increase green infrastructure and quality public spaces and improve the natural environment	Predicted population increase and development increases the risk that sewage overflows resulting in water pollution events will occur. While there is some discussion of sewage treatment capacity in the Plan, this is largely limited to the context of district panning priorities. There is a need to consider sewage treatment capacity in the Region more broadly.
49	Objective 5: Increase green infrastructure and quality public spaces and improve the natural environment	Strategy 5.10 should prioritise the implementation of the Risk-Based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions (EPA, Office of Environment and Heritage, 2017) to help manage the impact of land use activities on the health of waterways.
		A new strategy point should be included for the minimisation of surface and groundwater pollution.
		The potential impacts of the decommissioning of power stations on water quality should be considered in a new strategy point. For example, there is currently scientific uncertainty about how the decommissioning of the water-cooling system at Vales Point power station will impact sedimentation and, in turn, water quality in Lake Macquarie.
91	Central Lakes: District Planning Priorities	The Plan identifies that the water quality of Tuggerah Lakes is declining and that there needs to be improved treatment of stormwater and management of flows into the lakes. A strategy point should be inserted to address this issue. That point should endorse implementation of the <i>Risk-Based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions</i> (EPA, Office of Environment and Heritage, 2017).

100	Hinterland: Planning Priorities	District	Amend p. 100 of the Plan to read "sustaining good water quality and <u>avoiding water pollution events</u> ".
			The Plan notes that Wallalong and Swan Bay – Twelve Mile Creek may not be suitable for future urban growth because there is limited access to reticulated sewage. The Plan should identify the risk that development could result in sewage overflows and, in turn, water pollution events if development in the area occurs prior to an increase in sewage treatment capacity.

Waste

The EPA supports the Plan's endorsement of circular economy principles. The Plan's consideration of those principles could be further strengthened by implementing relevant NSW Government policies and guidelines as follows:

Page	Objective	Proposed amendment
26	Objective 1: Diversify the Hunter's mining, energy and industrial capacity	Include wording as follows in the text of this Objective: "The NSW Waste and Sustainable Materials Strategy 2041 provides the Government's long-term strategic framework for communities, industry and all levels of Government to reduce waste, increase recycling, reduce emissions and harm to the environment and realise the environmental and economic benefits of a circular economy. This Strategy is supported by the Waste Infrastructure Needs Guide and the NSW Plastics Action Plan".
		Include a new strategy as follows: "Strategic planning and waste management strategies should align with the NSW Waste and Sustainable Materials Strategy 2041 and NSW Circular Economy Policy Statement – Too Good to Waste 2019".
		Include a new strategy addressing the NSW Government's Net Zero emissions by 2050 target (as it relates to waste), in the following terms: "reduce organic waste in landfill by supporting local councils to provide communities with best-practice food and garden waste management infrastructure, ensure composts or other organic soils are of the highest quality for land application and facilitate the development of 'waste to energy' facilities".

Contaminated Land

There is a prevalence of legacy pollutants in the Region, including at end-of-life coal fired power stations, former manufacturing and industrial lands and defence facilities. These contaminants attract high levels of community concern. Therefore, it is appropriate that the Plan expressly considers the contamination issues facing the Region. To that end, the EPA proposes the following amendments:

Page	Objective	Proposed amendment
22-24	Objective 1: Diversify the Hunter's mining, energy and industrial capacity	The Plan notes that rehabilitated mines and decommissioned power stations could become renewable energy hubs. This objective would benefit from a brief consideration of the requirements for the remediation of contaminated land by reference to the Contaminated Land Management Act 1997 and State Environmental Planning Policy No 55 – Remediation of Land.
58	Objective 8: Build an inter-connected and globally focused Hunter	The Plan should note the ongoing challenges around the remediation of Perfluoroalkyl and Polyfluoroalkyl Substances contamination at Royal Australian Air Force Base Williamtown and the Singleton Military Area.
69	District Planning Priorities: North West Lake Macquarie	The Plan discusses brownfield land release and the re-use of mining lands. The Plan should note the need to remediate lands featuring legacy pollutants in this context.
83	Regionally Significant Growth Areas: Liddell and Bayswater Power Station Growth Area	The Plan notes that the planned closures of the Liddell and Bayswater power stations provide an opportunity to develop the region's first renewable energy hub. A consideration of the need to remediate legacy pollutants at the sites should be included.
93	Regionally Significant Growth Areas: Morisset Growth Area	In circumstances where there are several mines, two major power stations in Morisset and predicted population growth, the Plan should identify the importance of remediation from legacy pollutants in the area.
		Update the Plan to note the advanced closure of Eraring power station.

Land Use Conflict

The EPA supports the Plan's focus on the minimisation of land use conflict but considers that several sections of the Plan would be strengthened by an express recognition of this priority:

Page

17	Urban development program	Include the minimisation of land use conflict as a priority for the Hunter urban development program committee.
18	Infrastructure first and place-based framework	Amend the Plan as follows: "For growth areas where new greenfield residential subdivisions are proposed, place strategies can help to: - identify suitable land uses to mitigate impacts on current and future sensitive receivers".
26	Post-mining land use principles	Amend strategy 1.3 as follows "New industrial areas shall be prioritised in locations that: - mitigate impacts on current and future sensitive receivers".
32-33	Objective 3: Create a 15 minute region made up of mixed, multi-modal, inclusive and vibrant local communities	The text for this objective should recognise the risk that the 15 minute region will result in land use conflict between different uses, as well as the need to minimise that risk.
36	Objective 4: Plan for "Nimble Neighbourhoods", diverse housing and sequenced development	The discussion regarding rural towns and villages should consider the potential for land use conflict between new rural residential housing and agricultural land. Propose that a new strategy point for this Objective be inserted which includes the following wording from p.101 of the Plan: "Ensure non-agricultural development proposals consider potential for land use conflict with existing and future agricultural uses of land in the vicinity of the site".
38	Objective 4: Plan for "Nimble Neighbourhoods", diverse housing and sequenced development	Include the "minimisation of land use conflict" as a dot point for strategy 4.1.
39	Objective 4: Plan for "Nimble Neighbourhoods", diverse	The EPA queries whether the graphic at strategy 4.4 represents percentages that are sufficient to minimise land use conflict. The graphic would be

	housing and sequenced development	more helpful if it identified the intended land use zonings for the greenfield percentages.
67	Priorities: Housing within 30 minutes of the	The Plan states that housing will be developed within 30 minutes of the Williamtown Special Activation Precinct. Include a note that no residential development will be permitted within the Precinct.

General Matters

The EPA also proposes the following general amendments:

- a) capitalise "Indigenous" throughout the Plan; and
- b) the term "amenity" is used throughout the Plan to describe a range of adverse impacts on sensitive receivers in proximity to development, as well as the attractiveness of a place. The EPA recommends that these impacts are specifically identified, whether they be with respect to noise, odour or otherwise.

From:

DPE PSVC Hunter Mailbox;

Cc: Subject: Hunter Regional Plan 2041 EPA submission

Date: Friday, 11 March 2022 2:10:24 PM

Attachments: image001.png
Strategic Planning Unit - OUT - EPA submission for Hunter Regional Plan 2041.PDF

Dear and team

Please find attached the submission on the draft Hunter Regional Plan 2041.

Please don't hesitate to call us if you have any questions.

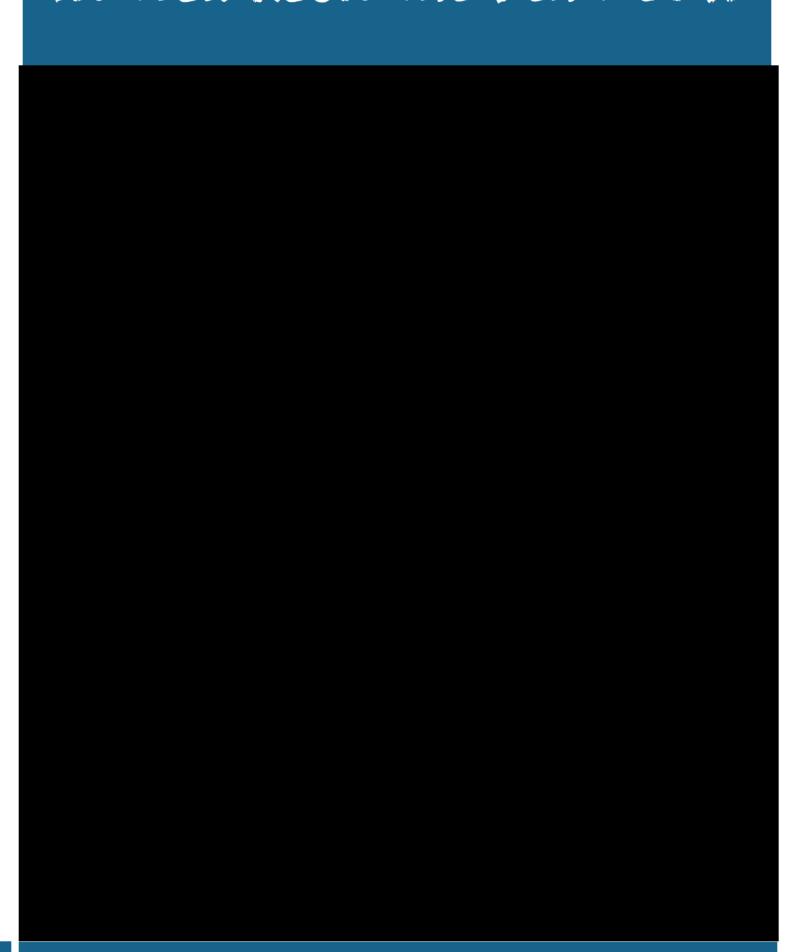
Kind regards,



The acknowledges the traditional custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.

Report pollution and environmental incidents 131 555 or +61 2 9995 5555

SUBMISSION ON THE DRAFT HUNTER REGIONAL PLAN 2041



INTRODUCTION

values the opportunity to contribute to the Hunter Regional Plan 2041.
is a leading nature-driven escapes organisation, welcoming 1.7 million day visitors and overnight guests to its New South Wales holiday parks each year.
Operating as a profit for purpose business, manages 37 holiday parks and 43 community reserves on NSW crown land. Any surplus from its operations is reinvested in the 9,289 hectares of land that it cares for on behalf of the people of New South Wales.
purpose is to share nature's playground in a way that gives back to local communities. It measures its success by its quadruple bottom line performance, including social, cultural, environmental and economic outcomes.
As borders reopen and people gain renewed confidence to make holiday plans, well positioned to be part of the State's economic recovery. It works in partnership with Crown Lands, Destination NSW, industry bodies, and local councils and communities to attract visitors to NSW towns.
In 2020/21 recorded 733,639 visitor nights, including 400,446 in the Hunter and Mid-Coast regions. The added economic value to NSW is approximately \$89 million annually*. Many of its parks are located in regions that have been significantly impacted by bushfire, floods, drought and the pandemic in recent years, and the economic contribution of tourism will play an important role in these communities' recovery.
Over the next 5 years will invest in significant capital works to upgrade its parks to meet the needs of guests and deliver greater value to the people of NSW.
aim to be a key enabler in growing the visitor economy in the Hunter and Mid-Coast regions in partnership with the Department of Planning and Environment and local councils and communities.
March 2022

OUR PARKS AND RESERVES ACROSS NSW

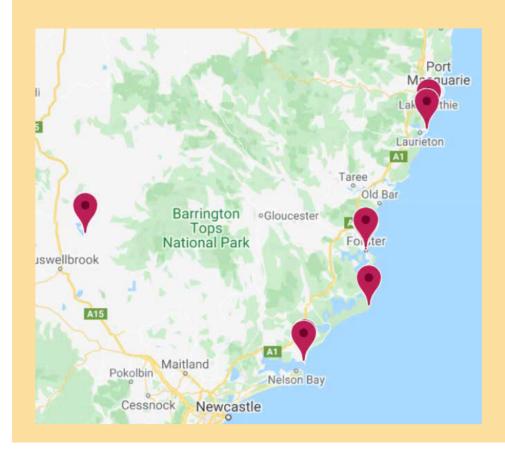


OUR CONNECTION TO THE REGION

We operate 8 parks in the Hunter and Mid-Coast regions:

- Lake Glenbawn (Upper Hunter LGA)
- Jimmys Beach (Mid Coast LGA)
- Hawks Nest (Mid Coast LGA)
- Seal Rocks (Mid Coast LGA)
- Forster Beach (Mid Coast LGA)
- Tuncurry (Mid Coast LGA)
- North Haven (Port Macquarie-Hastings LGA)
- Bonny Hills (Port Macquarie-Hastings LGA)

In addition to tourism drivers, they are valued recreational assets for their local communities.



Our planning framework

All holiday parks operate under the Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2021. This specifies permitted activities.

Additionally, all parks have a section 68 licence with the local council which outlines the site usage and details, such as the number of dwellings. Section 68 licences are usually issued for a five year period.

Lake Glenbawn

- Located 15 minutes from Scone, in the picturesque Upper Hunter, adjacent to Glenbawn Dam
- An oasis of green rolling hills, pristine water, plenty of wildlife and some of the best freshwater fishing in NSW
- The lake is popular for water sports, such as water skiing and jet skiing
- Reflections is investigating the potential to develop a mountain bike riding trail as an additional tourism asset for the region
- Accommodation options include cabins, and powered and unpowered camping sites
- Facilities include a boat ramp, swimming pool, tennis court, and children's playground
- The park is dog friendly



Lake Glenbawn is a place to reconnect with friends, relax in a cabin, or camp by the water, close to nature

Jimmys Beach

- Located in Hawks Nest, adjacent to Jimmys Beach and the Karuah River, and a short walk from Bennett's Beach
- Local attractions include Corrie Island
 Nature Reserve and Mount Yacaaba
- Accommodation options include cabins, glamping, and powered and unpowered camping sites
- Facilities include a communal camp fire, children's playground and a camp kitchen

Jimmys Beach is a paradise for water lovers of all ages

Hawks Nest

- Nestled between Bennett's Beach and a short stroll from village of Hawks Nest
- Local attractions include hiking at Mount Yacaaba, golf, or surfing at Bennett's Beach
- Accommodation options include cabins and powered camping sites
- The park is dog friendly



Seal Rocks

- Located a 45 minute drive from Forster and a 25 minutes drive from Blueys and Boomerang Beach
- Nestled between flourishing green forest and the Number One Beach
- Local attractions include hiking to Sugarloaf Point Lighthouse, mountai biking and diving
- Accommodation options include cabins, glamping or powered campir sites



Forster Beach

- Located in the heart of Forster, and a short walk from Tuncurry
- Local attractions include surfing, fishing at Wallis Lake, swimming at the ocean baths and dining or shopping at the nearby Forster CBD
- A convenient base to explore the broader Great Lakes area, from the lush green hinterland to the lovely Green Point and Green Cathedral near Booti Booti National Park
- Accommodation options include cabins and powered camping sites

Forster Beach brings the best of both worlds: outdoor fun for all the family and premium accommodation a short stroll from restaurants.

Tuncurry

- Direct access to Nine Mile Beach and Tuncurry Rockpool
- Local attractions include fishing in Wallis Lake, swimming
- A short stroll from Tuncurry and Forster CBD
- Facilities include a children's playground, tennis court
- Accommodation options include cabins and powered camping sites
- The park is dog friendly during off peak seasons

Stroll from Tuncurry to Forster, admiring the pristine water views.

North Haven

- Located between Laurieton and Camden Head, and an easy drive from Port Macquarie
- Bordering 12 acres of bushland between the Camden Haven Inlet and Grants Beach
- Local attractions include a stroll along the nearby North Haven Beach, fishing in the river or on the beach, exploring the Dooragan National Park, hiking up North Brother Mountain, surfing, swimming or cycling
- Facilities include a children's playground and golf
- Accommodation options include cabins and powered or unpowered camping sites
- This park is dog friendly



Bonny Hills

- Located between Port Macquarie and the waterways of Camden Haven, and perched atop a headland with incredible views over Rainbow Beach
- An ideal base to explore Greater Port Macquarie, including rainforests, food and dining, events and adventure activities
- Local attractions include swimming, surfing, fishing and whale watching
- Accommodation options include cabins, glamping and powered camping sites
- This park is dog friendly



Bonny Hills provides a peaceful escape amongst nature.

FEEDBACK ON THE DRAFT PLAN

Objective 1: Diversify the Hunter's mining, energy and industrial capacity

Tourism can contribute to the diversification of the Hunter's economy.

Objective 2: Ensure economic self-determination for Aboriginal communities

We respect and value Aboriginal culture and heritage. We aim to develop strong relationships with Aboriginal and Torres Strait Islander peoples in the communities in which we operate and identify areas where we can partner.

In 2022 we will work with Crown Lands and Indigenous representatives to develop a Reconciliation Action Plan (RAP). We also aim to partner with local Aboriginal and Torres Strait Islander communities to introduce cultural experiences at our parks and reserves. This will enable our guests and the wider community to learn about Aboriginal culture and Aboriginal people's significant, ongoing connection to the lands and waterways, while creating local employment opportunities.

Objective 3: Create a 15 minute region made up of mixed, multi-modal, inclusive and vibrant local communities

Guests generally arrive via car. Some parks are walking distance from the town centre (e.g. Forster and Tuncurry). Others are a short drive away.

Shared cycling facilities would contribute to the goal of a 15 minute region. Lake Glenbawn could be part of that loop. Reflections sees an opportunity to introduce mountain biking in the hills around Lake Glenbawn.

Objective 5: Increase green infrastructure and quality public spaces and improve the natural environment As managers of Crown Land we are responsible for the protection of native flora and fauna on our lands, and the control and eradication of any noxious weeds. Our parks hold an abundance of wildlife, as the land is a major water source.

Our parks and reserves, and neighbouring waterways, provide an opportunity for outdoor and nature experiences. We will liaise with local councils to identify opportunities to partner and identify whether our reserves could be used for more community recreation activities. For example, Lake Glenbawn reserve hosts the Scone Horse Festival, a valued attraction for the local community and a tourism drawcard.

In Strategic Land Use Planning, the biodiversity value of crown land reserves could be considered as part of the identification of areas of high environmental value.

FEEDBACK ON THE DRAFT PLAN

Objective 6: Reach net zero and increase resilience and sustainable infrastructure

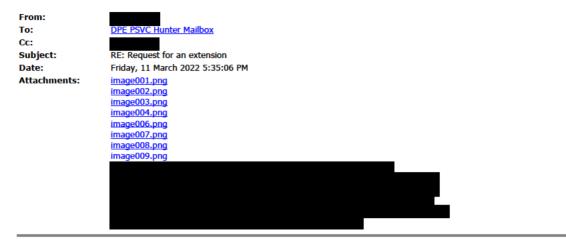
Climate change is having a noticeable impact on our parks and reserves. In recent years the communities that our parks are located within have been impacted by bushfire, drought and floods. Additionally, coastal parks such as Clarkes Beach are experiencing coastal erosion, while North Coast parks have been impacted by flooding.

Objective 8: Build an inter-connected and globally focused Hunter

It would be good to include a strategy for the Hunter's international and domestic visitor economy. The natural beauty of the region, outdoor experiences and parks and reserves are a significant asset. Many visitors are from other areas of NSW and a growing proportion are from other states.

As many visitors arrive by car, roadside signage pointing to visitor attractions is also important.

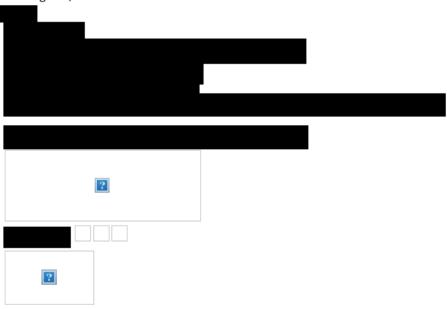




Hi ,

Please find our submission attached. It can be made public.

Kind regards,



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On Behalf Of DPE PSVC Hunter Mailbox From:

Sent: Thursday, 3 March 2022 11:55 AM

Subject: RE: Request for an extension

CAUTION: This email has originated from outside of the organisation and comes from an untrusted source. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Thank you for your email to the Department of Planning and Environment.

I have discussed with our Manager regarding the late submission request. The decision is to extend the deadline until Friday, 11th of March.

Please send the submission to this mailbox.

Hope this helps.



The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

Sent: Wednesday, 2 March 2022 6:47 PM

To: DPE PSVC Hunter Mailbox < Hunter@planning.nsw.gov.au>

Subject: Request for an extension

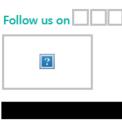
Hello,

is keen to provide a submission re: the Hunter Regional Plan.

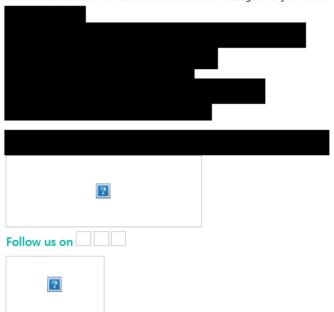
Unfortunately several of our parks on the north and south coasts have been impacted by floods which has diverted our attention.

Could we have an extension please?

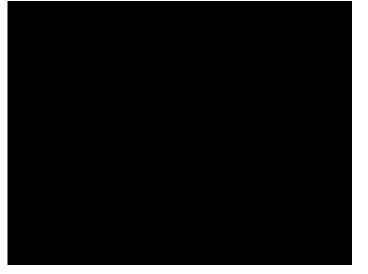




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11 March 2022

NSW Department of Planning, Industry and Environment

Email: hunter@planning.nsw.gov.au PO Box 1226, NEWCASTLE NSW 2300

RE: — DRAFT HUNTER REGIONAL PLAN 2041

The welcomes the opportunity to provide comments to the Draft Hunter Regional Plan 2041 (draft Plan), currently on public exhibition by the Department of Planning and Environment (the Department).

The is the leading advocate for Australia's biggest industry – property. It champions the interest of more than 2200-member companies that represent the full spectrum of the industry, including those who invest, own, manage and develop in all sectors of property.

Property is the nation's biggest industry – representing 13% of Australia's GDP and employing more than 1.4 million Australians. Our members are the nation's major investors, owners, managers and developers of properties of all asset classes. They create landmark projects, environments, and communities where people can live, work, shop and play. The property industry shapes the future of our cities and has a deep long-term interest in seeing them prosper as productive and sustainable places.

We acknowledge and appreciate Government's recent engagement with industry regarding the draft Plan and understand through this engagement that consultation will continue post exhibition and encourage its consideration in alignment with the Draft Regional Transport Plan which is now due for exhibition on 21 March.

Should you have any questions, please do not hesitate to contact

1. Executive Summary

The welcomes the opportunity to provide comments to the Draft Hunter Regional Plan 2041 (draft Plan).

A key issue for the industry is that what was expected to be an update to the existing Hunter Regional Plan 2036 (HRP2036) appears to be a comprehensive revision, including changes that move away from longstanding regional level outcomes or practices.

Given the vast and comprehensive nature of the changes, this submission does not attempt to address every element of the Draft Plan. Instead, it focuses on the elements that appear to introduce material or fundamental changes in regional-level planning intentions or practice. A summary of all recommendations is provided below.

NEW FORMAT

'Big Ideas'

Clearer strategic directions and more accompanying actions should be provided in the final version of the draft Plan to ensure the pathways to achieving desired outcomes associated with the plan's 'Big Ideas' are clearly understood by all stakeholders.

Strategic Alignment

The Department should continue to work closely with key stakeholders (beyond the exhibition period) to ensure the implications of fundamental and material changes to regional-level planning are fully understood before Draft Plan is finalised.

This update to the HRP2036 should still serve to provide more detailed guidance to inform Council's work programs where strategic gaps exist, or urgent adjustments are required to implement existing or new regional-level planning priorities.

The final version of the Draft Plan should reflect (in mapping and written intent) relevant local planning outcomes that are currently endorsed (e.g., Urban Investigation Areas) to avoid confusion or unnecessary complexities in planning and plan-making processes.

MEASURED OUTCOMES

Dwelling Requirements

The final version of the Draft Plan should provide clear strategic directions and pathways for change to guide planning for future housing supply, including an indication of where targets may be required **above** the implied dwelling requirements to meet real demand.

Housing Supply Targets

The final Plan should provide directions for planning housing land supply and an indication of housing land supply targets / planning benchmarks to 2041, including how this should be factored into local-level planning. These targets should factor in change in demand from increased regional migration.

Greenfield / Infill Delivery Ratio

The final Plan should provide clear strategic directions an associated actions to achieve the fundamental shift required to realise a greater proportion of residential growth through infill development. This should include conclusive definitions for what constitutes 'greenfield' versus 'infill' development to allow progress to be meaningfully monitored.

Optimum Density

The final Plan should not rely on a density measure as an overall planning average at the regional scale, and instead use it as a place specific indicator. This will rely on clearer strategic directions and pathways for achieving change around specific features (e.g., public transport nodes and urban renewal corridors) or locations (e.g., early-stage growth areas) where planning control frameworks should be set or re-set to achieve higher densities than currently envisaged.

15-minute neighbourhoods

The final Plan should provide clearer strategic directions and pathways for achieving 15-minute neighbourhoods, including corresponding directions for infrastructure planning and delivery.

HOUSING LAND SUPPLY

Priority Locations

The final Plan should re-instate place-based directions for priority housing growth areas where further planning and infrastructure coordination/delivery efforts are required. This should include place-based directions for established growth areas along the New England Highway corridor (namely between Maitland and Huntlee) as an ongoing regional planning priority within the Greater Newcastle District.

Regionally Significant Growth Areas

The final Plan should provide clearer strategic directions actions for the Viticulture Growth Area, supported by tangible actions for Government. This includes reflecting key mapped elements across both Cessnock and Singleton Local Government Areas and recognise the need to prioritise planning for existing businesses to ensure these are retained within the Region.

EMPLOYMENT LAND SUPPLY - PRIORITY LOCATIONS

Regional-scale economic study

The final Plan should be underpinned by a regional level economic study to provide a clearer indication of the demand, priority locations and directions for planning in relation to employment lands.

TRANSPORT INFRASTRUCTURE

Public transport

The Plan should be finalised in conjunction with the Regional Transport Plan to ensure these documents provide a clear and consistent framework for integrated planning to occur for and around transport infrastructure.

The Hunter Expressway (HEX) Corridor Growth Area

The HEX Corridor Growth Area boundaries and directions should be reviewed to avoid confusion and introducing unnecessary complications to planning and delivery in established urban growth areas.

The review of HEX Corridor Growth Area boundaries and directions should be underpinned by an economic study.

ENABLING DEVELOPMENT

Mines Grouting Fund

The final Plan should support an extension of the Newcastle Mines Grouting Fund and consider applying it within other high-growth areas such as Lake Macquarie. The fund needs to have an ongoing feeding mechanism to provide the level of certainty needed for investment decisions.

2. Detailed Commentary and Recommendations

NEW FORMAT

'Big Ideas'

The acknowledges and supports in principle the following 'Big Ideas' presented in the Draft Plan:

- Greater diversification of employment, mining and energy generation lands.
- Sequenced planning for new land uses and infrastructure.
- New pathways to promote economic self-determination and greater recognition and respect of traditional custodians.
- Establishment of net zero emissions as a guiding principle.
- 15-minute mixed use neighbourhoods.
- Emphasis on infill approaches to growth.
- A renewed focus on green infrastructure, public spaces and nature.
- Prioritisation of walking, cycling and public transport.
- Reinforcing the importance of equity to provide greater choice.

Achieving the desired outcomes described for each of these will rely on Government leadership and whole-of-Government coordination.

Greater detail and further discussion and engagement with industry and other stakeholders will be required as to how these objectives will apply across the region and how these outcomes will be achieved. The Draft Plan moves away from the action-based format and objectives of the HRP2036 and doesn't answer the question of how these new objectives will be achieved.

Recommendation: Clearer strategic directions and more accompanying actions should be provided in the Final Plan to ensure the pathways to achieving desired outcomes associated with the Plan's 'Big Ideas' are clearly understood by all stakeholders.

Strategic Alignment

Regional plans set the framework and directions for strategic land use planning. While the Draft Plan is a consultation document, it could now be utilised as a material consideration in the assessment of Planning Proposals to amend Local Environmental Plans. Even in its draft form, it is given statutory weight through the *Environmental Planning and Assessment Act 1979*. More significantly, it will serve to influence investment decisions within the Region as these are made based on the information available in the public domain at the time.

The Draft Plan was expected to be a review of the HRP2036 and would have been better served if it clearly outlined the new objectives and how they related to the direction of the HRP2036 or how they differ and why it has moved away from the original plan. This would allow for a more focused consideration of the implications of any apparent fundamental and material changes proposed in the

Draft Plan, which warrant careful consideration to avoid undue impacts to investment certainty and confidence and to avoid jeopardising the successful implementation of regional-level planning priorities.

Recommendation: The Department should continue to work closely with key stakeholders and industry (beyond the exhibition period) to ensure the implications of fundamental and material changes to regional-level planning are fully understood before Plan is finalised.

Since the HRP2036 was initially released, the first generation of Local Strategic Planning Statements have been introduced for every Local Government Area in the region. The Draft Plan reverts to these wherever possible, which appears to provide them with more weight – in the decision-making process - than the regional plan. We recognise the work Councils have done to establish their Local Strategic Planning Statements to date; however, also acknowledge the challenges each area faced in establishing these.

Recommendation: This update to the HRP2036 should still serve to provide more detailed guidance to inform Council's work programs where strategic gaps exist, or urgent adjustments are required to implement existing or new regional-level planning priorities.

The format of the Draft Plan also makes it difficult for planning practitioners to conclusively determine how a proposal aligns with the strategic framework. The aim should be to minimise the number of documents one has to consult through the planning process.

Recommendation: The final Plan should reflect (in mapping and written intent) relevant local planning outcomes that are currently endorsed (e.g., Urban Investigation Areas) to avoid confusion or unnecessary complexities in planning and plan-making processes.

MEASURED OUTCOMES

Monitoring program

A rigorous and thorough monitoring process should be established, preferably through an independent body such as the newly-formed Greater Cities Commission, to track how the Department and Local Councils are performing in delivering the outcomes of the Plan. Key performance indicators, such as housing approvals and completions, gross floor area of employment-generating land uses, processing times of development applications, timely provision of key infrastructure, etc could be identified and used to provide a framework for tracking progress. This will give a degree of transparency and accountability for stakeholders and the community that the NSW Government is progressing and delivering on the Plan.

Recommendation: A framework to monitor the delivery of the plan should be developed and implemented to ensure transparency and accountability on the delivery of the Plan.

Dwelling requirements

The HRP2036 indicated 70,000 additional dwellings are required to 2036 to cater for the projected levels of population growth, of which around 85% were expected be in the Lower Hunter LGAs (60,600 combined total for Lower Hunter LGAs). The Greater Newcastle Metropolitan Plan (GNMP) indicated similar levels of developments, indicating around 60,450 additional dwellings would be required.

We acknowledge that these dwelling requirements are a product of the State-wide population projections, which are reviewed and updated separately to the Regional Plan review process. We also recognise that these figures represent the <u>implied</u> dwelling requirement, which may not be entirely reflective of <u>actual</u> demand. The current State-wide projections are also not reflective of population

growth changes occurring during the COVID-19 pandemic, where a 'tree-change' occurred creating increased demand for housing. In addition to this, people who would have moved away from the Hunter area delayed or postponed their plans due to the uncertainty of COVID. The anticipated typical loss of population did not occur, and a greater influx of people moving to the area has created greater demand for housing supply than the NSW Government would have accounted for pre-COVID.

The recently commissioned an analysis of regional housing supply considerations for every region in NSW. Some key revelations emerging from this research as relevant to the Hunter are summarised below.

- The Hunter is on track to deliver the implied dwelling requirements set out in the HRP2036, but development activity suggests the implied dwelling requirements fall short of real demand. This trend pre-dates the COVID-19 pandemic, which indicates factors beyond population growth (e.g., growth in tourism) are also driving residential development within the region.
- The extent to which housing in the Hunter is accessible (e.g., available for sale and rent) and affordable (in relation to household income) is diminishing. In conjunction with the insight above, this suggests that supply is not keeping pace with real demand.
- Certain areas within the region already appear to be functioning as supply-driven markets.

Collectively, these insights point to the need for a greater emphasis on and support for upfront strategic planning, particularly in regional plans, which is also one of the key recommendations of the Regional Housing Taskforce. The Draft Plan currently does not provide any indication of the number of dwellings anticipated to be required to 2041 or how this should be factored into local-level planning.

Recommendation: The final Plan should provide clear strategic directions and pathways for change to guide planning for future housing supply, including an indication of where targets may be required above the implied dwelling requirements to meet real demand.

Housing land supply targets

Regional-level plans are material considerations in the assessment of Planning Proposals. The *Greater Newcastle Metropolitan Plan 2036* (GNMP) states Planning Proposals for new urban release areas will not be supported unless an individual Local Government Area (LGA) (under Action 19.1) or the Urban Development Plan (UDP) (under Action 17.3) identifies a 'less than 15-year supply' of new dwellings is available.

Each LGA has established its own methodology for measuring housing land supply, which limits the extent to which supplies can be compared within the Greater Newcastle Metropolitan District. To date, only one UDP annual report has been published, which does not specify whether any additional land is required to maintain adequate supply.

The Draft Plan does not provide any update as to whether additional land is required to maintain adequate supplies, or if the 15-year supply benchmark established in the GNMP remains relevant. Instead, this is a stated responsibility of the established UDP committee.

However, the Draft Plan does make an unqualified statement that there is ample housing supply available as justification to preclude the establishment of entirely new development fronts within the next 10 years. Despite this, it goes on to provide, but not commit to, the locations of 'potential future growth areas' should circumstance change.

The approach to planning for housing land supply is intrinsically linked to the dwelling requirements described above. It should also be considered a critical element to providing the greater emphasis on

and support for upfront strategic planning, particularly in regional plans, as recommended by the Regional Housing Taskforce.

Recommendation: The final Plan should provide directions for planning housing land supply and an indication of housing land supply targets / planning benchmarks to 2041, including how this should be factored into local-level planning.

Greenfield / Infill delivery ratio

The GNMP set a target of 60% dwellings growth to occur through 'infill' (which is also described as the 'existing urban area'), with the remaining 40% to occur through additional greenfield release. The Draft Plan target for the GNMP 'district' revises this to 80% infill and 20% greenfield, with a further guide of 50-75 dwellings per hectare of developable land to be the optimum density achieved overall. Individual place strategies / projects to specify what is appropriate for a given area (p37). A small-lot target is not specifically addressed in the Draft Plan.

The only annual report ever published by the Urban Development Program indicates Greater Newcastle has historically been achieving a 50/50 split between Greenfield and Infill development. This suggests a fundamental change in practice may be required to achieve the desired change in this ratio. However, we also recognise that the definition of infill has sometimes included development within Urban Release Area land because these lands are shown as part of the existing 'urban footprint'. The unclear nature of this categorisation has historically made tracking progress against this target somewhat controversial.

Recommendation: The final Plan should provide clear strategic directions and associated actions to achieve the fundamental shift required to realise a greater proportion of residential growth through infill development. This should include conclusive definitions for what constitutes 'greenfield' versus 'infill' development to allow progress to be meaningfully monitored.

Optimum Density

The GNMP previously set a guide for urban densities of between 50-75 people/jobs per hectare in catalyst areas and urban renewal corridors, with a further target of 25% of all housing growth being in the form of small-lot and multi-dwelling housing.

As mentioned above, the Draft Plan proposes a target of 50-75 dwellings per hectare of developable land to be the optimum density achieved overall. A small-lot target is not specifically addressed in the Draft Plan. Delivery of this is described as relying upon individual place strategies / projects to specify what is appropriate for a given area.

We understand most new residential areas in the Hunter have historically delivered density levels between 10-15 dwellings per hectare. That suggests a fundamental change in practice may will be required to achieve the desired outcome described in the draft Plan. However, the regional-level average density has, to our knowledge, never been quantified.

Property Council supports the principle of utilising density targets to make the most efficient use of land, but it is unclear how the approach currently described in the Draft Plan is meant to be achieved. There is also no mechanism to monitor density, so it is unclear how progress towards achieving this optimum density will be measured.

Recommendation: The final Plan should not rely on a density measure as an overall planning average at the regional scale, and instead use it as a place specific indicator. This will rely on clearer strategic directions and pathways for achieving change around specific features (e.g., public transport nodes and urban renewal corridors) or locations (e.g., early-stage growth

areas) where planning control frameworks should be set or re-set to achieve higher densities than currently envisaged.

15-minute neighbourhoods

HRP2036 set a target for 95% of people to live within 30 minutes of a 'strategic centre' by 2036. This Draft Plan goes further, proposing the creation of 15-minute neighbourhoods as applied in three primary contexts of urban, suburban and rural; the three principle elements of this concept being time of travel, mode of travel, and types of services that are accessible. As with the optimum density target, delivery of this is also described as relying upon individual place strategies / projects to specify what is appropriate for a given area.

Achieving this target will rely on delivery within both established and newly emerging centres, which needs to occur in conjunction with appropriate planning for and investment in enabling infrastructure.

The Property Council supports this as a valuable aspiration, whilst acknowledging the challenges presented with the different contexts, but it is unclear how the approach currently described in the Draft Plan is meant to be achieved. There is also no mechanism to distance-based accessibility at a regional-level, so it is unclear how progress towards achieving this target will be measured.

Recommendation: The final Plan should provide clearer strategic directions and pathways for achieving 15-minute neighbourhoods, including corresponding directions for infrastructure planning and delivery.

HOUSING LAND SUPPLY

Priority Locations

HRP2036 named the Maitland Corridor, Newcastle - Lake Macquarie Western Corridor, and the emerging corridor centred on Cooranbong, Morisset, and Wyee as 'growth areas', and commits the Government to prioritising planning efforts and funding for the delivery of regional infrastructure within these locations.

When comparing these directions with the current draft Plan, it appears:

- The Draft Plan in its final form will repeal the Maitland Corridor and the Newcastle Lake Macquarie Western Corridor, as part of the Greater Newcastle District, given no update or placebased directions are provided for these areas.
- The Draft Plan in its final form will elevate the status (from a planning-perspective) of the emerging corridor centred on Cooranbong, Morisset and Wyee to a 'regionally significant growth area', with directive mapping and planning considerations provided as part of the Central Lakes district.

This change introduces a high degree of ambiguity for priorities along the New England Highway in particular, where early-stage urban release areas are expected to continue delivering the highest levels of growth outside the Sydney Metropolitan area. These areas can serve as important delivery mechanisms for other place-based outcomes sought by the draft Plan, including in relation to residential densities and 15-minute neighbourhoods.

Recommendation: The final Plan should re-instate place-based directions for priority housing growth areas where further planning and infrastructure coordination/delivery efforts are required. This should include place-based directions for established growth areas along the New England Highway corridor (namely between Maitland and Huntlee) as an ongoing regional planning priority within the Greater Newcastle District.

We also note the Maitland Corridor and the Newcastle – Lake Macquarie Western Corridor areas overlap with the newly-introduced Hunter Expressway (HEX) Corridor Growth Area, which appears to give priority to planning for the HEX greater weight in these locations. Relevant recommendations are provided later in this submission.

Regionally Significant Growth Areas

We support the inclusion of the Viticulture Growth Area, corresponding to the Hunter Valley Vineyards District, as a Regionally Significant Growth Area given the area's contribution to the Hunter's economy and its location across two Local Government Areas. The has been an active participant in Cessnock Council's Vineyards District Planning Project as a reference panel member in recent years. We acknowledge some of the ideas emerging from this project are reflected in the strategic directions and mapping shown in the draft Plan.

There have been several commitments and attempts by government at various levels to provide a unified planning framework and platform for investment in the Hunter Valley Vineyards District for decades. In our view, this work remains ongoing and relies heavily on broader coordination to resolve competing and conflicting values across tourism, agriculture, and other drivers seeking opportunities for development within the area. This includes the needs of current businesses who may be seeking to expand or diversify their existing operations.

The State-wide planning framework available to support tourism and rural enterprises is less flexible than similar frameworks available for urban areas. This typically warrants a more bespoke approach and innovative responses (e.g., in land use zoning and assessment considerations). In our view, the current place-based directions for the Viticulture Growth Area do not provide a clear indication to the market as to what actions will be taken by State or Local Government to address longstanding complexities.

Recommendation: The final Plan should provide clearer strategic directions actions for the Viticulture Growth Area, supported by tangible actions for Government. This includes reflecting key mapped elements across both Cessnock and Singleton Local Government Areas and recognise the need to prioritise planning for existing businesses to ensure these are retained within the Region.

EMPLOYMENT LAND SUPPLY- PRIORITY LOCATIONS

Regional Level Economic Study

The GNMP identified a series of Catalyst Areas, most of which are intended to drive employment uses or economic productivity. The Draft Plan accepts all the existing GNMP Catalyst Areas as 'regionally significant growth areas', which commits the NSW Government to preparing Place Strategies for these areas.

The Draft Plan goes on to nominate an extensive quantity of land as 'for investigation' to provide future employment lands, including (but not limited to):

- The HEX Corridor Growth Area, as the preferred location for industrial and freight and logistics uses.
- The Liddell and Bayswater Power Station Growth Area, supporting it to be repurposed as a renewable energy hub with spare capacity to accommodate other employment generating uses, and
- 'Areas of Interest' within existing Upper Hunter mining areas, supporting these to be repurposed for post-mining for intensive employment-generating purposes.

The Draft Plan does not provide a clear indication of the approach or timeframes to establish or review planning frameworks for these areas. Yet, collectively, they encompass an area around twice the size of the Western Sydney Aerotropolis, which was afforded a significant level of public sector resourcing to support upfront strategic planning and infrastructure coordination / delivery.

Employment land monitor data for the Hunter shows a considerable amount of zoned and undeveloped supplies is already available on top of the additional investigation areas / areas of interest proposed in the Draft Plan. Yet, the Draft Plan does not acknowledge the established locally nominated employment precincts – particularly those with direct access to the New England Highway and heavy rail line - that still appear to have capacity.

Recommendation: The final Plan should be underpinned by a regional level economic study to provide a clearer indication of the demand, priority locations and directions for planning in relation to employment lands.

TRANSPORT INFRASTRUCTURE

Public transport

GNMP action 20.2 commits the Government to develop guidance for redevelopment near specific train stations and other transport nodes throughout Greater Newcastle. An info box within the GNMP discusses the need to make better use of heavy rail infrastructure across the metropolitan area.

Planning for development around train stations is not specifically addressed in the Draft Plan. There is general acknowledgement of housing between two to four storeys within walking distance of town centres, public open space and rail stations and the promoting of densities in greenfield areas to make public transport and a mix of uses viable, and Fast Rail is anticipated.

It is not yet known whether the guidance for development around train stations will be provided in the updated Regional Transport Plan.

Recommendation: The Plan should be finalised in conjunction with the Regional Transport Plan to ensure these documents provide a clear and consistent framework for integrated planning to occur for and around transport infrastructure.

The Hunter Expressway (HEX) Corridor Growth Area

HRP2036 Action 4.10 committed the Government to prepare a strategy for land along the HEX that considers its region-shaping potential and the GNMP Action 23.1 directs Councils to ensure rezoning of land within the HEX corridor is consistent with the HEX Corridor Principles (incorporated into the GNMP) and the strategy proposed in HRP2036 Action 4.10.

A draft HEX Strategy was exhibited in December 2020. This was never finalised as a standalone document and instead has been incorporated directly into the Draft Plan, which identifies the HEX Corridor as a 'Regionally Significant Growth Area'.

The approach to planning within the HEX Corridor Growth area is underpinned by the Planning Principles previously introduced by the GNMP, to:

- 1. Maximise accessibility through the existing interchanges to maintain connectivity and productivity across Greater Newcastle.
- 2. Protect high value land adjacent to each interchange for industrial and freight and logistics uses.
- 3. Protect the operation of the HEX by limiting the encroachment of sensitive residential uses.

Neither the draft Strategy previously exhibited, nor the draft Plan provide a clear justification as to how the HEX interchange growth area boundaries were established. The radii distances applied varies widely for each interchange, increasing in scale from east to west. For example:

- Buchanan interchange radius = 1-2km
- Branxton Allandale interchanges radii = 5-6km

As previously described, the boundaries identified for the Branxton-Allandale and Kurri-Loxford interchanges overlap considerably with land that has been established through rezonings as priority locations for housing future housing, as part of growth area extensions to the long-standing Maitland Corridor identified in HRP20362036. The intent for planning within the HEX Corridor Growth Area is not entirely compatible with the priority afforded to residential growth within these areas. This is evident in the directions that serve to 'prohibit' any further residential rezonings.

Recommendation: The HEX Corridor Growth Area boundaries and directions should be reviewed to avoid confusing or introducing unnecessary complications to planning and delivery in established urban growth areas.

The intent for planning within the HEX Corridor Growth Area also openly aims to privilege industry and freight and logistics uses on higher value land adjoining the HEX interchanges. There is no indication given as to the amount of land that would be required to meet the needs of these industries, nor does mapping identify preferred sites. This provides a high degree of ambiguity for future planning and planmaking, particularly given the apparent availability of employment lands in suitable locations along the New England Highway and Golden Highway, which also form part of the national freight network.

Recommendation: The review of HEX Corridor Growth Area boundaries and directions should be underpinned by an economic study.

ENABLING DEVELOPMENT

Mines Grouting Fund

Under District Planning and Growth Areas the Draft Plan mentions the Newcastle Mines Grouting Fund. This fund is crucial to providing certainty to investors and enabling growth and development. The fund is due to expire at the end of 2022 and the Property Council has been calling for the extension of this fund along with consideration of extension to other areas such as Lake Macquarie. We have raised the issues of mapping requirements and we understand this fund is currently under review. The growth of the Greater Newcastle Area is dependent on the ability of investors and developers to be able to access the certainty that the fund provides and should not be underestimated as a critical function.

Recommendation: The final Plan should support an extension of the Newcastle Mines Grouting Fund and consider applying it within other high-growth areas such as Lake Macquarie, along with completion of mapping.

-END-

From:
To:
DPE PSVC Hunter Mailbox
Cc:

Subject: Draft Hunter Regional Plan 2041

Date: Friday, 11 March 2022 5:42:19 PM

Attachments: image001.png

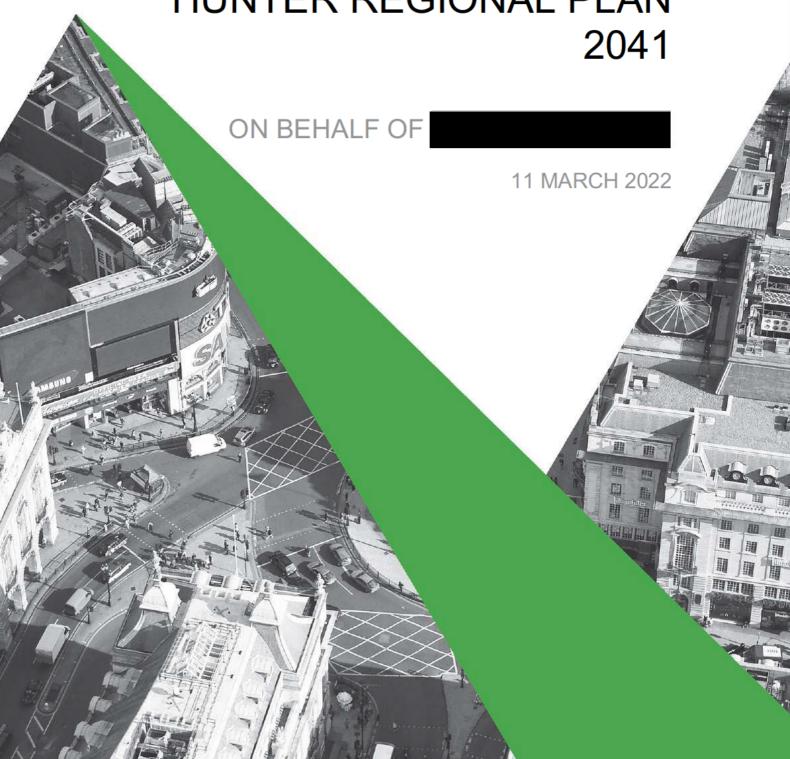
Hi

Please find attached submission for the Draft Hunter Regional Plan 2041 from the





SUBMISSION TO DRAFT HUNTER REGIONAL PLAN



QUALITY ASSURANCE		
PROJECT:	Submission to Exhibition of Draft Hunter Regional Plan	
ADDRESS:		





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BACKGROUND & EXECUTIVE SUMMARY

This submission is made in response to the exhibition of the draft Hunter Regional Plan (HRP) 2041 that was placed on exhibition until 4 March 2022 noting that an extension of time to make a submission on behalf of was granted.

n have engaged a team of consultants to review the exhibited material, including

This submission is made in relation the HRP 2041 and is supportive of the identification of the broader Hunter Region for future economic growth and to serve for the expansion of a recognised growing population in the broader Hunter Region.

This is a specific submission in relation to North Arm Cove (NAC) on behalf of who own a substantial amount of land within the area- in the order of 67Ha and importantly including the key road network relevant to the non-urban subdivision road lots through NAC.

We note that the HRP 2041 is a broad document but identifies and recognises a series of 'incomplete towns/villages' and considers the ability for future growth.

We submit that North Arm Cove possesses the potential for future residential growth, subject to resolution of a series of infrastructure and environmental considerations that are currently being progressed through a series of studies by

North Arm Cove has had a long history and has been identified for close to 100 years as an area for development and a long standing history of concern with the hundreds of existing land owners in North Arm Cove- many of whom own a series of small land parcels with no ability to construct housing on them.

The potential for residential development in North Arm Cove can:

- Provide resolution to an existing problem with the Schedule Lands and existing landowners;
- Provide for the expansion of housing in a location proximate to the broader Williamtown Special Activation Precinct;
- Resolve the issue of infrastructure in terms of road access, and the provision of sewer and water. Noting investigations are being progressed by Alathan on the issue of infrastructure and the provision of infrastructure within North Arm Cove can be self-funding.
- Resolve the issue of bushfire risk through additional road access points to the Pacific Highway and suitable road layouts and APZs;

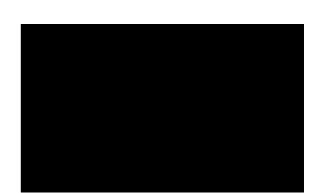


- Address the issue of biodiversity through NAC noting commissioned studies with exploratory work to review offsetting and Stewardship agreements and the ability to regenerate existing vegetation, extent of retention, and consideration of critically endangered species and wildlife corridors.

Hence, we submit that North Arm Cove should remain an area that is considered for future growth and this is on the basis that whilst there are obvious known constraints within North Arm Cove there should be the ability to explore potential solutions, and their implications, to have a more informed consideration of the ultimate destiny of NAC.

These studies are being progressed by and we consider it prudent to enable this work to be done and then further informed assessments can be made of its suitability for residential growth. For information purposes we have also provided a copy of the submission made to MidCoast Council in relation to their Rural Land Strategy that contains further detailed information.

Therefore it is requested that consideration of North Arm Cove for future residential development be acknowledged.



SITE CONTEXT

North Arm Cove has an area of 740 hectares and contains approximately 3500 existing lots. An extract of the NAC Paper Subdivision Summary prepared by Mid Coast Council is provided below- sourced from the Mid Coast Rural Strategy- Paper Subdivisions Analysis report.

Paper Subdivision summary		
Deposited Plan Numbers	9938, 9939, 9940, 12275, 12276, 12277, 13357 13358 and 13400	
Approximate number of lots	3,500	
Area	740 hectares	
Land Use Zone	RU2 Rural Landscape (GL LEP 2014)	
Minimum Lot Size for Dwelling Entitlement	40 hectares	



Extracts of the studies by Mid Coast Council are provided below for the context and history of North Arm Cove.

Description and Context

The North Arm Cover paper subdivision is primarily zoned RU2 Rural Landscape with a minimum lot size of 40 hectares under Great Lakes LEP 2014. The area extends from the northern side of Port Stephens to the Pacific Highway.

The location forms part of the Australian Agricultural Company's original land grant in 1826 and between 1826 and 1850 the company headquarters were at Carrington, before being relocated to Stroud. During World War 1 the deep waters for Port Stephens were considered suitable for military and commercial shipping, with development anticipated on the northern foreshores to accommodate returned servicemen.

In 1918 the AA Company holding was transferred to a land development company and Walter Burley Griffin was engaged to prepare a concept plan of 'Port Stephens City'. The unusual subdivision pattern reflects this history and lot sizes are extremely variable, ranging from 328 square metres to over ten hectares.

In 1920 this concept plan of approximately 3200 lots of varying sizes and shapes, was registered by the Registrar General's Department. However, no roads or open space were dedicated in these subdivisions. A similar plan was prepared by W S Griffiths in 1920 at Pindimar and resulted in approximately 2100 lots being registered.

The land has historically been owned by large company holdings and either remained in a natural state or were modified for agricultural activities including pine plantations. The lands were formally zoned rural on 15 May 1964, with limited village zones applied in Carrington, North Arm Cove, Bundabah and Pindimar.

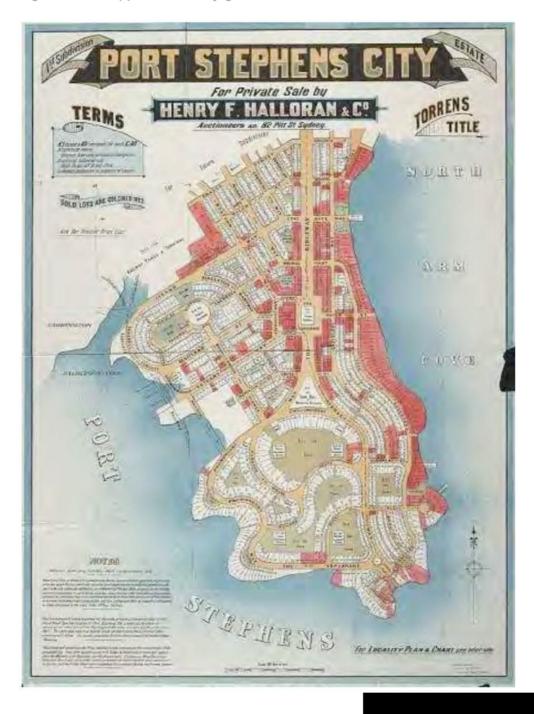
This change also saw the introduction of a 40ha minimum for the construction of a dwelling house, except when: related to a 'legitimate intensive agricultural occupancy', or for owners at the appointed day. For land owners with an 'existing holding', there was also a requirement to address vehicle access and adequacy of utility and other services.

The use and management of the land appears to have changed after a bushfire damaged most of the pine plantation in 1980. Significant speculative land sale campaigns throughout the 1980s diversified ownership across these rural areas, as shown in the promotional information on the following page.

The Hunter Regional Plan No.1 (1982) strategies indicated support for protection of these areas; and growth in more suitable locations at Tea Gardens-Hawks Nest, where infrastructure including public water and sewer systems were available. The Plan also recognised that the oyster industry within Port Stephens may be jeopardised by any significant clearing and development within this area.

Since the 1980s Council and the Department of Planning have received enquiries regarding the potential rezoning and development of land within the paper subdivisions of North Arm Cove and surrounds. Some enquiries have been submitted with commitments to provide infrastructure, services and facilities to the resulting development and environmental studies undertaken by the companies in partnership with other landowners, but none have come to fruition.

These enquiries were not supported or encouraged by Council or the Department given the lack of strategic merit and unreasonable expectations that funding such investigations and applications may give individual land owners.



is Lot 1 DP 131041- being the majority of the paper roads- that has an area of approximately 69.64Ha. This is reflected on an image below. This is a significant land holding in the context of NAC.





DRAFT HUNTER REGIONAL PLAN 2041 & NORTH ARM COVE

We have reviewed the exhibited material and note that North Arm Cove is not identified specifically in the document. However after consideration of the relevant objectives and intent of the HRP 2041 we submit that there is opportunity to explore North Arm Cove for urban development.

PROVISION OF EXPANDED HOUSING AND RESOLUTION OF THE SCHEDULED LANDS PROBLEM

North Arm Cove can provide for the expansion of housing through a suitable subdivision pattern and design of the road networks in order to deal with issue of bushfire and ecology.

IDENTIFIED CAPACITY AND PROVISION FOR INFRASTRUCTURE

Prior studies for North Arm Cove by Mid Coast Council sets out that the lack of sewerage is also an environmental concern for NAC. We note that servicing of the existing dwellings and lots could be achieved through a reticulated water and sewer system through the provision of new pipeline connections through NAC to then connect to the east into the planned network for Bundabah, Pindimar and Tea Gardens to then connect into the existing water reservoir.

The MidCoast Water investigations in 2015 placed NAC as priority group 1 in establishing servicing and the cost estimate for the delivery of sewer was \$11,400,000 to the existing NAC dwellings. It was acknowledged by MidCoast Water that the significant cost of servicing was a key hurdle, particular for NAC. That report identifies a suitable proposed alignment and location for services infrastructure connection to the subject site.

Therefore should development be progressed utilising the Schedule 7 Paper Subdivision provisions of the EP&A Act 1979 in NAC there is a funding mechanism, through development contributions that would:

- Resolve existing environmental problems arising from the lack of sewer to the current NAC dwellings through provision of suitable infrastructure;
- Provide funding to upgrade the system and treatment facilities with broader benefits to other areas in the Mid Coast region.

This would have substantial community benefits and environmental benefits for NAC.

We note that we have experience with the application of the Schedule 7 provisions and we are are confident we can facilitate the satisfaction of the provisions of Schedule 7 as it addresses the majority of landowners and there is an alignment with the majority of the landowners in NAC.

IDENTIFIED PHYSICAL ATTRIBUTES OF NORTH ARM COVE & INITIAL STUDIES COMMISSIONED BY ALATHAN

Prior studies identify that NAC is ecologically diverse and that consideration of flora and fauna is important as is the issue of bushfire affectation.

The work underway by _____ is looking to explore solutions in relation to the issue of bushfire, servicing, and ecology. The current preliminary studies in relation to bushfire, ecology and servicing indicate that:

- **Bushfire**: There is the ability to adequately mitigate bushfire risk through suitable design mechanisms including:
 - Establishment of new vehicular access points to the Pacific Highway for evacuation and establishment of adequate vehicular access generally through NAC for firefighting appliances and a bushfire responsive layout and configuration that will enable the provision of suitable APZ's and places for refuge in the event of bushfire.
 - Expansion of static water sources but importantly the provision of hydrants and other fundamental firefighting measures and infrastructure.
- Servicing: There is the ability to provide new piped water and sewer connection points and development of NAC would lead to developer contributions to close the funding gap in servicing NAC and generate positive environmental outcomes through appropriate treatment of wastewater and positive outcomes for existing residents of NAC. This will assist in dealing with the OSSM problems that currently exist.
- Ecology: There is exploratory work occurring to identify the extent and quality of existing ecological communities across NAC with a view to determining the extent of redevelopment that may be able to occur within the relevant biodiversity legislative frameworks. Early discussions and investigations to review:
 - Offsetting and Stewardship agreements. If required.
 - Ability to regenerate existing vegetation, extent of retention, and consideration of critically endangered species and wildlife corridors.
 - Determining the ability to undertaken necessary clearing to establish required infrastructure as well as bushfire mitigation.

Progression of these matters on the basis of the above further work and technical studies will provide a clearer picture of the resolution for NA

ALIGNMENT WITH INTENT OF THE DRAFT HUNTER REGIONAL PLAN 2041

There are a series of Objectives set out in Part 2 of the HRP 2041 that are relevant to the potential development of North Arm Cove as set out below:

Objective 4: Plan for Nimble Neighbourhoods: Diverse Housing and Sequenced Development

There is a clear direction in the HRP 2041 for the provision of the expansion of housing, including diverse new housing. It also identifies the need for potential future growth areas and Strategy 4.5 sets out that there is a need for identification for potential future growth areas.

The strategy identifies Karuah and Swan Bay as a potential area for residential population growth, noting North Arm Cove is in proximity to this area and there is already an identified means of resolving the issues of the provision of sewer and water within NAC as compared to Karuah. We also note that the ownership patterns in Karuah are fragmented whereas the situation with NAC is that there a strong alignment of landowners who wish to progress development of NAC. Hence there is a desire and intent within NAC and the landowners to enable development.

Therefore the identification of NAC as a potential area for growth should be considered.

As noted in the strategy the identification of these potential future growth areas 'is not a development commitment, nor does it imply that all, or any, part of these areas will be made available for urban development in the future. To remove any doubt, the department will not support premature planning, investigation or promotion of these areas; we will investigate their future role in the next review of the Hunter Regional Plan.'

This is entirely sensible as relevant studies need to be made of their suitability for development. We submit that North Arm Cove could be afforded a similar identification- which is simply an identification- and not a commitment. That it, future studies are necessary to determine suitability of NAC for development which is entirely appropriate but its ability to be considered for future residential growth should be nominated.

Objective 5: Increase green infrastructure and quality public spaces and improve the natural environment

North Arm Cove possesses the ability to achieve a development in a bushland setting and the suitable consideration, and restoration, of biodiversity values and biodiversity corridors.

As noted in the strategy that 'avoid, minimise and offset' hierarchy will be applied to development and current studies by Alathan are following that adopted approach with regard to the issue of biodiversity.

Objective 6: Reach net zero and increase resilience and sustainable infrastructure

The key driver is to consider natural hazards such as flooding, bushfire and the like noting North Arm Cove possesses limited flood prone areas. Studies are also progressing in relation to bushfire and means of suitably mitigating that risk and the provision of suitable infrastructure can occur by way of sewer, water, and the like. This can also be self-funded within North Arm Cove with initial investigations already occurring into the potential provision of sewer and water- subject to funding that can occur with redevelopment.



District Planning and Growth Areas

Coast Area

North Arm Cove sits on the fringe of Greater Newcastle District, within the Coastal District, in proximity to the Karuah Centre at Figure 6- showing the location of North Arm cove.





The Coast District adopts as series of District Planning Priorities including:

- Future Growth in Existing Urban AreasDiverse Housing Choices
- Coastal Walks Between Communities
- Bushfire Risk
- Coastal Environments

North Arm Cove is capable of balancing these priorities whilst providing for expanded housing choice.





We submit that North Arm Cove possesses the potential for future residential growth, subject to resolution of a series of infrastructure and environmental considerations that are currently being progressed through a series of studies by

North Arm Cove has had a long history and has been identified for close to 100 years as an area for development and a long standing history of concern with the hundreds of existing land owners in North Arm Cove- many of whom own a series of small land parcels with no ability to construct housing on them.

The potential for residential development in North Arm Cove can:

- Provide resolution to an existing problem with the Schedule Lands and existing landowners;
- Provide for the expansion of housing in a location proximate to the broader Williamtown Special Activation Precinct;
- Resolve the issue of infrastructure in terms of road access, and the provision of sewer and water. Noting investigations are being progressed by Alathan on the issue of infrastructure and the provision of infrastructure within North Arm Cove can be self-funding.
- Resolve the issue of bushfire risk through additional road access points to the Pacific Highway and suitable road layouts and APZs;
- Address the issue of biodiversity through NAC noting Alathan have commissioned studies with exploratory work to review offsetting and Stewardship agreements and the ability to regenerate existing vegetation, extent of retention, and consideration of critically endangered species and wildlife corridors.

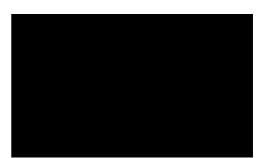
Hence, we submit that North Arm Cove should remain an area that is considered for future growth and this is on the basis that whilst there are obvious known constraints within North Arm Cove there should be the ability to explore potential solutions, and their implications, to have a more informed consideration of the ultimate destiny of NAC. These studies are being progressed by Alathan and we consider it prudent to enable this work to be done and then further informed assessments can be made of its suitability for residential growth.

Therefore it is requested that consideration of North Arm Cove for future residential development be acknowledged.





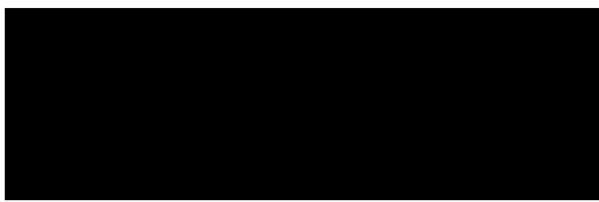
ANNEXURE 1: COPY OF SUBMISSION TO MIDCOAST RURAL STRATEGY











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BACKGROUND & EXECUTIVE SUMMARY

This submission is made in response to the exhibition of the draft Mid Coast Rural Lands Strategy (MCRLS) placed on exhibition between 30 August 2021 and 28 January 2022.

have engaged a team of consultants to review the exhibited material and NAC, noting the team includes and has been led by and has been led by .

This submission is made in relation to North Arm Cove (NAC) on behalf of who own a substantial amount of land within the area- in the order of 67Ha and importantly including the key road network relevant to the non-urban subdivision road lots through NAC.

The submission is supported and endorsed by the North Arm Cove Rate Payers Association Inc (NACRPA). Refer to Annexure "2" that contains a copy of this letter.

is working with landowners in the area, notably to resolve key constraints, particularly the fragmented land ownership, roads, environmental and bushfire issues. They are holding discussions with other landowners within NAC and importantly the North Arm Cove Rate Payers Association Incorporated. Noting that the owners are keen to see progression of an outcome within NAC, and commissioning studies in the NAC paper subdivision area to understand the constraints in detail.

seek to resolve the longstanding issues in the NAC area to the satisfaction of Council, landowners, and the community. The work underway by indicates that there are likely solutions to the key constraints identified in the Study, and on that basis, it is considered that progression of any changes to the zoning in NAC should be deferred from the Rural Lands Strategy to enable further work to be done and then further consideration by Mid-Coast Council after that work is completed.

This is on the basis that whilst there are obvious known constraints there should be the ability to explore potential solutions, and their implications, to have a more informed consideration of the ultimate destiny of NAC. Simply rezoning parts of NAC with an 'Environmental' zoning will have no material impact in resolving the existing issues for residents and land owners. It may, in fact, hinder potential solutions which may be supported by all stakeholders. The suggested approach as outlined here and evidenced in this document in no way contradicts or prejudices any potential outcome and merely allows time for a full and transparent assessment.

It should be noted that the primary constraints analysis set out in the exhibited material is reproduced over the page as well as the recommended changes to the existing planning controls.



Constraints analysis

LOW	MEDIUM	HIGH
flooding or coastal hazards	Environmentally sensitive vegetation	Legal and constructed public road access
steep land of 18% (32 degrees)	Planning for Bushfire Protection	Configuration and ownership
		reticulated water and sewer services
		OSSM DAF mapping

Recommendations

The paper subdivision of North Arm Cove has a *medium to high level of constraint*. Primarily these constraints relate to the number of allotments, *very high number of land owners*, lack of access to allotments, environmental constraints that would severely restrict development and on-site sewage management options. In addition, the single road access represents a significant issue relating to isolation and evacuation on bushfire prone land.

The limited development potential of North Arm Cove would be reliant on the provisions of the State Guidelines to achieve a Development Plan with appropriate consolidation and compensation mechanisms. It is therefore recommended that:

- the paper subdivision be identified in the local environmental plan with the requirement for any future development to be in accordance with the NSW Government Planning for Paper Subdivision Guidelines (2014);
- the land be nominated as an area unsuitable for development or occupation under the SEPP (Exempt & Complying Development) 2008;
- the land in Crown and Council ownership be identified in an appropriate environmental zone;
- land affected by coastal wetlands be rezoned E2 Environmental Conservation;
- remaining areas are to be allocated an E3 Environmental Management zone and minimum lot size of 20 hectares, to reflect the environmental constraints and management requirements.

As identified above the Rural Lands Strategy suggests a rezoning of particular areas from the existing rural zoning to either an E3 Environmental Management Zone with a 20Ha lot size or an E2 Environmental Conservation. This is based on the identified constraints without detailed further investigations as to potential resolution of the identified constraints.

It is noted that resolution of some of these issues and constraints would resolve a series of existing issues for the NAC permanent residents and land owners- notably bushfire risk, and the provision of suitable reticulated water and sewer.

Current preliminary studies in relation to bushfire, ecology and servicing have been commissioned and a table is provided below addressing the identified constraints and their capability of resolution.



Constraint Level	Constraint identified	Commentary	Capable of Resolution?
High	Legal and constructed public road access	We note the status of the roads however Alathan own a substantial number of the key paper road lots in NAC. In any event should a redevelopment plan eventuate that follows the NSW Government Planning for Paper Subdivision Guidelines (2014) this could be resolved on the basis of a new road layout in conjunction with relevant owners.	Yes
High	Configuration and ownership	Alathan own a 67Ha parcel, and there is also another large land holder in NAC. Critically Alathan owns the majority of the roads and deals with one of the key issues identified in the constraints analysis.	Yes
		It is further noted that discussions are progressing more broadly with the community in relation to the mulfitude of owners across NAC- the majority of which seek resolution to the paper subdivision lands and seek the ability to be able to progress their land holding.	
High	Reticulated water and sewer services and existing OSSIV issues	of NAC would lead to developer contributions to	
Medium	Environmental Sensitive Vegetation	There is exploratory work occurring to identify the extent and quality of existing ecological communities across NAC with a view to determining the extent of redevelopment that may be able to occur within the relevant biodiversity legislative frameworks. Early discussions and investigations to review:	to Further

		 Offsetting and Stewardship agreements. If required. Ability to regenerate existing vegetation, extent of retention, and consideration of critically endangered species and wildlife corridors. Determining the ability to undertaken necessary clearing to establish required infrastructure as well as bushfire mitigation. 	
Medium	Planning for Bushfire Protection	There is the ability to adequately mitigate bushfire risk through suitable design mechanisms including: Establishment of new vehicular access points to the Pacific Highway for evacuation and establishment of adequate vehicular access generally through NAC for firefighting appliances and a bushfire responsive layout and configuration that will enable the provision of suitable APZ's and places for refuge in the event of bushfire. Expansion of static water sources but importantly the provision of hydrants and other fundamental firefighting measures and infrastructure. 	Yes
Low	Flooding or Coastal Hazards	The flooding and coastal hazard areas can be appropriately managed through a flood study and stormwater studies and strategies.	Yes
Low	Steep Land of 18% (32 degrees)	This is a low constraint that can be dealt with by way of skilful and site responsive design	Yes

Therefore it is requested that consideration NAC be deferred at this point of the rural lands study until such time as further work is done by

SITE CONTEXT

North Arm Cove has an area of 740 hectares and contains approximately 3500 existing lots. An extract of the NAC Paper Subdivision Summary is provided below-sourced from the Rural Strategy- Paper Subdivisions Analysis report.

Paper Subdivision summary		
Deposited Plan Numbers	9938, 9939, 9940, 12275, 12276, 12277, 13357 13358 and 13400	
Approximate number of lots	3,500	
Area	740 hectares	
Land Use Zone	RU2 Rural Landscape (GL LEP 2014)	
Minimum Lot Size for Dwelling Entitlement	40 hectares	





As set out in the studies:

Description and Context

The North Arm Cover paper subdivision is primarily zoned RU2 Rural Landscape with a minimum lot size of 40 hectares under Great Lakes LEP 2014. The area extends from the northern side of Port Stephens to the Pacific Highway.

The location forms part of the Australian Agricultural Company's original land grant in 1826 and between 1826 and 1850 the company headquarters were at Carrington, before being relocated to Stroud. During World War 1 the deep waters for Port Stephens were considered suitable for military and commercial shipping, with development anticipated on the northern foreshores to accommodate returned servicemen.

In 1918 the AA Company holding was transferred to a land development company and Walter Burley Griffin was engaged to prepare a concept plan of 'Port Stephens City'. The unusual subdivision pattern reflects this history and lot sizes are extremely variable, ranging from 328 square metres to over ten hectares.

In 1920 this concept plan of approximately 3200 lots of varying sizes and shapes, was registered by the Registrar General's Department. However, no roads or open space were dedicated in these subdivisions. A similar plan was prepared by W S Griffiths in 1920 at Pindimar and resulted in approximately 2100 lots being registered.

The land has historically been owned by large company holdings and either remained in a natural state or were modified for agricultural activities including pine plantations. The lands were formally zoned rural on 15 May 1964, with limited village zones applied in Carrington, North Arm Cove, Bundabah and Pindimar.

This change also saw the introduction of a 40ha minimum for the construction of a dwelling house, except when: related to a 'legitimate intensive agricultural occupancy', or for owners at the appointed day. For land owners with an 'existing holding', there was also a requirement to address vehicle access and adequacy of utility and other services.

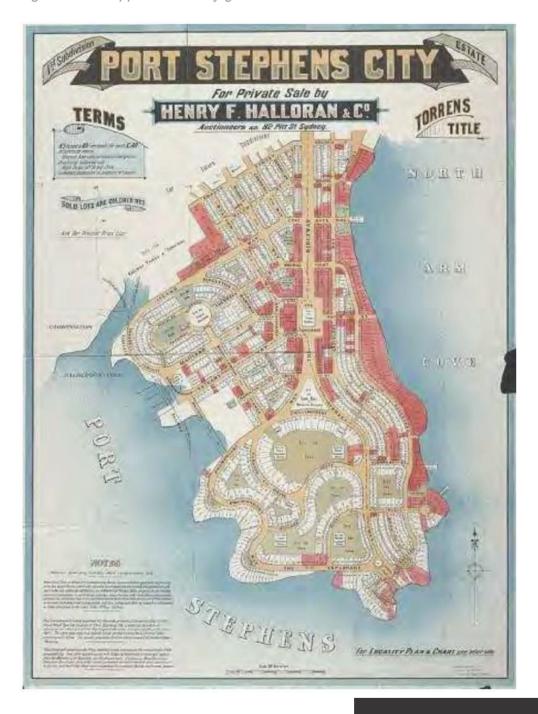
The use and management of the land appears to have changed after a bushfire damaged most of the pine plantation in 1980. Significant speculative land sale campaigns throughout the 1980s diversified ownership across these rural areas, as shown in the promotional information on the following page.

The Hunter Regional Plan No.1 (1982) strategies indicated support for protection of these areas; and growth in more suitable locations at Tea Gardens-Hawks Nest, where infrastructure including public water and sewer systems were available. The Plan also recognised that the oyster industry within Port Stephens may be jeopardised by any significant clearing and development within this area.



Since the 1980s Council and the Department of Planning have received enquiries regarding the potential rezoning and development of land within the paper subdivisions of North Arm Cove and surrounds. Some enquiries have been submitted with commitments to provide infrastructure, services and facilities to the resulting development and environmental studies undertaken by the companies in partnership with other landowners, but none have come to fruition.

These enquiries were not supported or encouraged by Council or the Department given the lack of strategic merit and unreasonable expectations that funding such investigations and applications may give individual land owners.





The is Lot 1 DP 131041- being the majority of the paper roads- that has an area of approximately 69.64Ha. This is reflected on an image below. This is a significant land holding in the context of NAC.





RURAL LANDS STUDY & PAPER SUBDIVISIONS ANALYSIS REPORT

We have reviewed the exhibited material for the Rural Lands Study and in this section, we summarise key elements from the relevant sections from the various documents and mapping extracts are contained at Annexure 1.

IDENTIFIED POPULATION OF NAC

The studies set out a number of points in relation to NAC:

Permanent Population: 445 as at the last census with a Median Age of 59 and a total of 341 existing dwellings.

Dwelling Vacancy: Is 40% noting the identification of the NAC at present as a higher proportion of holidaymakers and retirees.

IDENTIFIED CAPACITY FOR GROWTH & INFRASTRUCTURE

The studies set out a number of points in relation to NAC that the capacity for growth is extremely limited owing to known on-site sewerage issues and environmental constraints. The lack of sewerage is also an environmental concern for NAC.

However we note that servicing of the existing dwellings and lots could be achieved through a reticulated water and sewer system through the provision of new pipeline connections through NAC to then connect to the east into the planned network for Bundabah, Pindimar and Tea Gardens to then connect into the existing water reservoir.

The MidCoast Water investigations in 2015 placed NAC as priority group 1 in establishing servicing and the cost estimate for the delivery of sewer was \$11,400,000 to the existing NAC dwellings. It was acknowledged by MidCoast Water that the significant cost of servicing was a key hurdle, particular for NAC. That report identifies a suitable proposed alignment and location for services infrastructure connection to the subject site.

Therefore should development be progressed in NAC there is a funding mechanism, through development contributions that would:

- Resolve existing environmental problems arising from the lack of sewer to the current NAC dwellings through provision of suitable infrastructure;
- Provide funding to upgrade the system and treatment facilities with broader benefits to other areas in the Mid Coast region.

This would have substantial community benefits and environmental benefits for NAC.



IDENTIFIED INFRASTRUCTURE

The studies set out that:

- NAC has no reticulated water or sewerage services;
- NAC is accessed by Carrington Road, Glen Innes Road, Glencoe Street, Market Street and The Ridgeway, only these roads provide constructed public road access to any properties in the paper subdivision or village. Remaining roads, including privately owned roads within the paper subdivision, are unconstructed and may consist of basic bush tracks.

IDENTIFIED PHYSICAL ATTRIBUTES IN THE STUDIES

The studies identify that NAC is ecologically diverse and that consideration of flora and fauna is important.

COMMENTARY ON THE MID COAST COUNCILS DESIRE TO PROVIDE CERTAINTY FOR LANDOWNERS IN PAPER SUBDIVISIONS

A key stated aim of part of the strategy is to provide clarity on the constraints applying to these areas, recommendations for the future use of this land, and options available to land owners.

This is set out at Outcome 4.2.6:

Outcome 4.2.6. Provide certainty for landowners in 'Paper subdivisions'

- a) Undertake a high-level review of environmental constrains and development potential to provide clear and consistent guidance on:
 - zone and development standards that reflect current and potential land use;
 - State Government Paper Subdivision Guidelines
 - And options available to land owners within this framework

We note that this applies to a series of areas across the Mid Coast including Pindimar, Bundabah, Carrington, Copeland and North Arm Cove noting the majority were created by Paper Subdivisions before the introduction of planning legislation.

Whilst this is a suitable planning response it is noted that the various paper subdivision areas have differing constraints and they cannot all be 'lumped together'.

Given the ownership patterns and the like there should be sufficient consideration given to the ability to deal with the identified constraints- particularly if landowners are willing to commit financial resources and expertise in progressing detailed investigations to identify realistic solutions.





PROPOSED RECOMMENDATIONS FOR NORTH ARM COVE

We have reviewed the exhibited material for the Rural Lands Study and in this section make observations and comments in relation to NAC and the relevant sections from the various documents.

CONSTRAINTS ANALYSIS & RECOMMENDATIONS

The constraints analysis and recommendations are reproduced below.

Constraints analysis

LOW	MEDIUM	HIGH
flooding or coastal hazards	Environmentally sensitive vegetation	Legal and constructed public road access
steep land of 18% (32 degrees)	Planning for Bushfire Protection	Configuration and ownership
		reticulated water and sewer services
		OSSM DAF mapping

Recommendations

The paper subdivision of North Arm Cove has a *medium to high level of constraint*. Primarily these constraints relate to the number of allotments, *very high number of land owners*, lack of access to allotments, environmental constraints that would severely restrict development and on-site sewage management options. In addition, the single road access represents a significant issue relating to isolation and evacuation on bushfire prone land.

The limited development potential of North Arm Cove would be reliant on the provisions of the State Guidelines to achieve a Development Plan with appropriate consolidation and compensation mechanisms. It is therefore recommended that:

- the paper subdivision be identified in the local environmental plan with the requirement for any future development to be in accordance with the NSW Government Planning for Paper Subdivision Guidelines (2014);
- the land be nominated as an area unsuitable for development or occupation under the SEPP (Exempt & Complying Development) 2008;
- the land in Crown and Council ownership be identified in an appropriate environmental zone;
- · land affected by coastal wetlands be rezoned E2 Environmental Conservation;
- remaining areas are to be allocated an E3 Environmental Management zone and minimum lot size of 20 hectares, to reflect the environmental constraints and management requirements.



RESPONSE TO CONSTRAINTS ANALYSIS & RECOMMENDATIONS

As identified above the Rural Lands Strategy seeks to suggest a rezoning of particular areas from the existing rural zoning to either an E3 Environmental Management Zone with a 20Ha lot size or an E2 Environmental Conservation. This is based on the identified constraints without detailed further investigations as to potential resolution of these constraints. The work underway by indicates that there are likely solutions to the key constraints identified in the Study, and on that basis, it is considered that any decision relating NAC should be delayed in the assessment process and until the work proposed by Alathan is complete to allow further and more informed consideration by Mid-Coast Council after that work is completed.

This is on the basis that whilst there are obvious known constraints there should be the ability to explore potential solutions, and their implications, to have a more informed consideration of the ultimate destiny of NAC. It is relevant to note that significant work has commenced.

Simply rezoning parts of NAC with an 'Environmental' zoning will have no material impact in resolving the existing issues for residents and land owners.

It is noted that resolution of some of these issues and constraints in the paper subdivision, would resolve a series of existing issues for the NAC permanent residents-notably bushfire risk, and the provision of suitable reticulated water and sewer.

Current preliminary studies in relation to bushfire, ecology and servicing indicate that:

- **Bushfire**: There is the ability to adequately mitigate bushfire risk through suitable design mechanisms including:
 - Establishment of new vehicular access points to the Pacific Highway for evacuation and establishment of adequate vehicular access generally through NAC for firefighting appliances and a bushfire responsive layout and configuration that will enable the provision of suitable APZ's and places for refuge in the event of bushfire.
 - Expansion of static water sources but importantly the provision of hydrants and other fundamental firefighting measures and infrastructure.
- Servicing: There is the ability to provide new piped water and sewer connection points and development of NAC would lead to developer contributions to close the funding gap in servicing NAC and generate positive environmental outcomes through appropriate treatment of waste water and positive outcomes for existing residents of NAC. This will assist in dealing with the OSSM problems that currently exist.

- Ecology: There is exploratory work occurring to identify the extent and quality
 of existing ecological communities across NAC with a view to determining the
 extent of redevelopment that may be able to occur within the relevant
 biodiversity legislative frameworks. Early discussions and investigations to
 review:
 - o Offsetting and Stewardship agreements. If required.
 - Ability to regenerate existing vegetation, extent of retention, and consideration of critically endangered species and wildlife corridors.
 - Determining the ability to undertaken necessary clearing to establish required infrastructure as well as bushfire mitigation.

The above can potentially deal with:

- **Medium Constraint 1**: Environmental Sensitive Vegetation;
- **Medium Constraint 2**: Planning for Bushfire Protection;
- High Constraint 3 & 4: Reticulated Water and Services & OSSM

Therefore it is considered appropriate that these technical investigations be progressed. Alathan are willing to undertake this work in consultation with NAC landowners, Council and State Government agencies provided the current zoning is maintained while these resolutions are explored.

In relation to the other identified constraints:

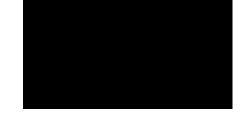
- High Constraint 1: Legal and Constructed Public Road Access: We note the status of the roads however Alathan own a substantial number of the key paper road lots in NAC. In any event should a redevelopment plan eventuate that follows the NSW Government Planning for Paper Subdivision Guidelines (2014) this could be resolved on the basis of a new road layout in conjunction with relevant owners.
- **High Constraint 2: Configuration and Ownership:** Alathan own a 67Ha parcel, and there is also another large land holder in NAC. Critically Alathan owns the majority of the roads and deals with one of the key issues identified in the constraints analysis.
- It is noted that discussions are progressing more broadly with the community in relation to the multitude of owners across NAC- the majority of which seek resolution to the paper subdivision lands and seek the ability to be able to progress their land holding. The NACRPA endorses and supports this submission.



- **High Constraint 3: Reticulated Water and Sewer Services:** The report commissioned by Midcoast Water (now Midcoast Council) in 2015 outlines a clear draft strategy. The facilitation for the completion of that strategy can and will be advanced by
- High Constraint 4: OSSM DAF Mapping: Refer 3 above.

Progression of these matters on the basis of the above further work and technical studies will provide a clearer picture of the resolution for NAC.





SUGGESTED PATH FORWARD

The Rural Lands Strategy seeks to suggest a rezoning of particular areas from the existing rural zoning to either an E3 Environmental Management Zone with a 20Ha lot size or an E2 Environmental Conservation. This is based on the identified constraints without detailed further investigations as to potential resolution of those constraints.

The work underway by indicates that there are solutions to the High constraints and likely solutions to the Medium constraints identified in the Study. On that basis, it is recommended that any changes to zoning to NAC within the Rural Lands Strategy be deferred. This will enable further work to be done and then further consideration by Mid-Coast Council after that work is completed.

Whilst there are obvious known constraints, they are identified at a desktop level. The detailed investigations underway and proposed by will provide the ability to explore potential solutions, and their implications, providing a more informed consideration of the ultimate destiny of NAC.

Simply rezoning parts of NAC with an 'Environmental' zoning will have no material impact in resolving the existing issues for residents and landowners. It may, in fact complicate those issues.

Resolution of some of these issues and constraints would resolve a series of existing issues for the NAC permanent residents- notably bushfire risk, and the provision of suitable reticulated water and sewer.

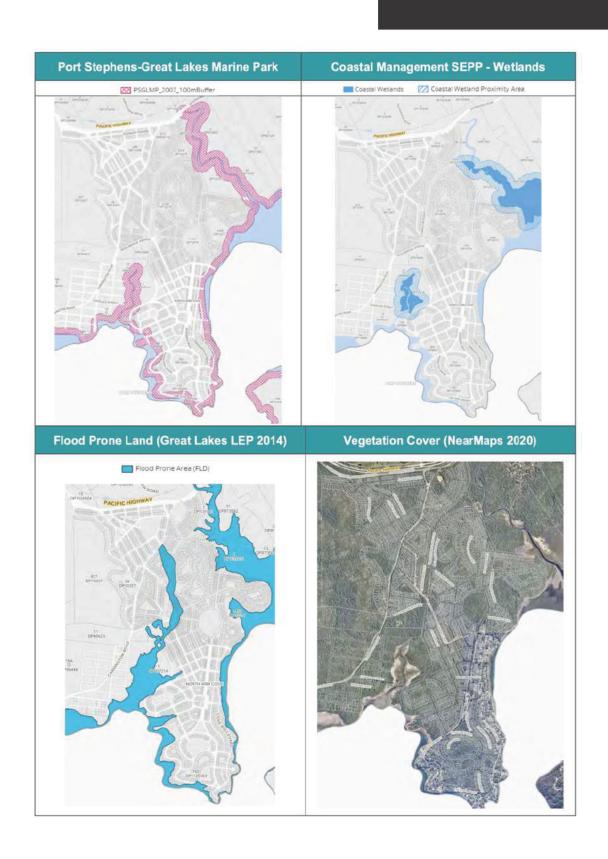
The commitment to this work that will be completed varies significantly from previous historical representations. The existence of the required expertise through alignment with the NACRPA provides an orderly consolidated approach.

Therefore it is requested that consideration NAC be deferred at this point of the rural lands study until such time as further work is done by



ANNEXURE 1 MAPPING EXTRACTS





ANNEXURE 2 – LETTER NORTH ARM COVE RATEPAYERS ASSOCIATION LETTER OF SUPPORT





25 January 2022



Mid Coast Council Rural Land Study Exhibition

To Whom It May Concern,

The committee have reviewed the submission to the **Mid Coast Council Rural Land Study Exhibition prepared** by (24

January 2022) and are pleased to inform you that we support the submission.

We further confirm our objection to a rezoning of North Arm Cove to an Environmental Zoning.

We look forward to formalising a collaborative, fair and equitable approach which takes into consideration our members' vision of sustainable smart solutions to the development of North Arm Cove.



From:
To:
DPE PSVC Hunter Mailbox
Cc:
Subject:
RE: Draft Regional Hunter Plan 2041
Date:
Friday, 11 March 2022 6:35:04 PM
Attachments:
image001.png
image002.png
image003.png

Dear

Thank you indeed for granting us an extension of time in providing this submission.
Please find attached our submission for your review.
Regards,



From: On Behalf Of DPE PSVC Hunter

Mailbox

Sent: Friday, 4 March 2022 4:33 PM

To:

Cc DPE PSVC Hunter

Mailbox < Hunter@planning.nsw.gov.au>

Subject: RE: Draft Regional Hunter Plan 2041

Good Afternoon

Thank you for your email to the Department of Planning and Environment.

Please be advised the extension of time is granted until Friday, 11 March 2022. Please provide the submission to the email address at Hunter@planning.nsw.gov.au.

Hope this assist with the completion of your submission.

Kind Regards,



The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing

commitment to providing places in which Aboriginal people are included socially, culturally and economically.

From:

Sent: Friday, 4 March 2022 4:20 PM

To: DPE PSVC Hunter Mailbox < <u>Hunter@planning.nsw.gov.au</u>>

Cc:

Subject: Draft Regional Hunter Plan 2041

Hi Regional team.

We have jus been made aware that submissions closed for the Draft Regional Hunter Plan 2041 at midday today. I just tried to call your office to discuss.

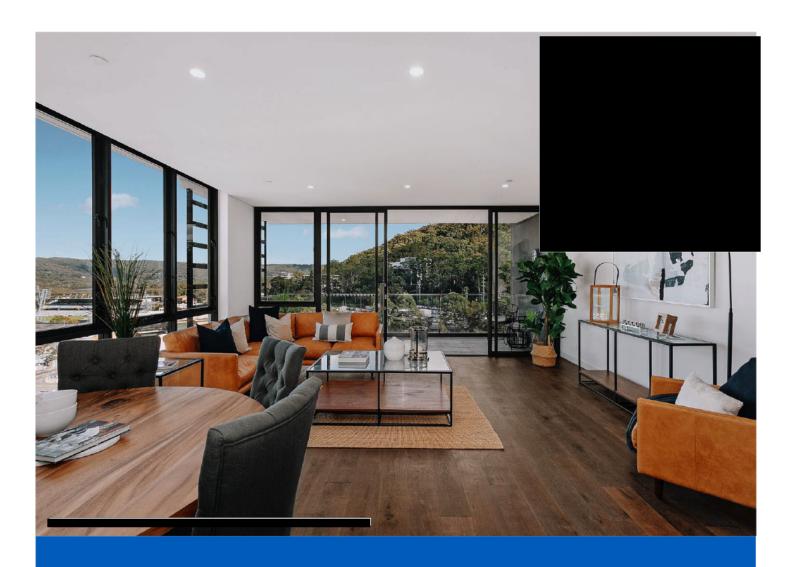
We have briefly reviewed the information at

We have a history with planning and outcomes in the Hunter and would be grateful if you would accept a late submission from us with a week.

Would you please advise if this is acceptable by return email?

Regards,





Draft Central Coast Regional Plan 2041

NSW Submission

March 2022

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CONTACT

For further information about any matter raised in the submission please contact:

ABOUT THE

Established in 1963, the sody representing the leading participants in urban development in NSW. Our more than 450 member companies span all facets of the industry including developers, consultants, local government and state agencies. We have a strong commitment to good growth in the regions. A quarter of our members are based in regional NSW, and we have active Chapters in the Hunter, Central Coast, and Illawarra Shoalhaven. Our advocacy is based on creating liveable, affordable and connected smart cities.

EXECUTIVE SUMMARY

The NSW welcomes the opportunity to provide comments on the *draft Central Coast Regional Plan 2041* (draft RP). It is pleasing to see the Department of Planning and Environment (DPE) fulfilling the commitment to a 5-year review of the *Central Coast Regional Plan 2036* (2036 plan).

The Central Coast is experiencing a surge in demand for housing and employment land that is undersupplied, and the severe financial difficulties at Central Coast Council are currently an enormous constraint on their ability to supply the housing and jobs needed. The NSW Government's new focus on the 6 City Megaregion of Greater Sydney, Hunter, Central Coast and Illawarra is expected to accelerate the fast pace of change for the region. It is critical to plan now for this growth, to ensure the region can supply the necessary employment land to support jobs, and adequate housing that remains affordable for the local population.

This draft Central Coast Regional Plan – and the *draft Hunter Regional Plan 2041* also on exhibition – is very different from its predecessor and every other regional plan in NSW. It is not so much a review of the 2036 plan as a complete revision of it. The draft neither overtly builds upon or provides a scorecard against the 2036 plan, nor does it offer any population, dwelling or jobs targets or projections. The draft contains very few Actions, and there is no implementation plan provided. The lack of these measures makes it difficult to assess the potential success of the 2036 plan or evaluate the draft RP, and recommends that such metrics be added.

Despite lacking important details, the draft RP outlines a new approach to planning that could be adaptable to a range of growth scenarios. is encouraged by the new approach under an Urban Development Program that seeks to support the production of more development ready land for housing supply and jobs on the Central Coast. We applaud the new thinking that aims to create a collaborative process to resolve site constraints early and support a robust and reliable development ready pipeline for new housing and employment land, with infrastructure delivery aligned with development. We also support the draft RP's ambitions to promote more efficient land use and move away from car dependent neighbourhoods where practicable, on the path to Net Zero, while increasing housing diversity, affordability, and liveability.

However, while we share these ambitions and believe the proposed approach has merit, we believe the draft RP leaves too many important questions unanswered and we are not confident that, as drafted, it will deliver the necessary housing and employment land to support the Central Coast's growth through 2041. It is our view that the draft RP could introduce more uncertainty in the planning process, given its lack of direction on:

- population, dwelling and jobs projections or targets;
- density targets for the region's individual growth areas;
- how to achieve a 15-minute neighbourhood; and
- how the Place Delivery Group and place strategy process will work.

These fundamental issues must be satisfactorily addressed in consultation with the development industry before UDIA can offer our support for the direction of the draft *Central Coast Regional Plan 2041*.

would like to work closely and constructively with DPE to enable the successful finalisation and subsequent implementation of the Central Coast Regional Plan 2041. Our submission outlines our recommendations to address these issues, broken down into three areas of focus:

- I. Setting measurable goals and refining Objectives
- II. Providing transparency, certainty and accountability in the process
- III. District planning and growth areas

Recommendations:

Focus Area # 1: Setting measurable goals and refining Objectives

RECOMMENDATION 1- To provide the community with some level of clarity and industry with confidence to invest and to guide council, the Regional Plan should include population, dwelling, density and jobs projections or targets; and Actions to direct council on what is required in their local strategies to be consistent with the Regional Plan, when this must occur and how councils will be held accountable.

RECOMMENDATION 2 – To provide more certainty and accountability, apply the SMART methodology to outline Actions to deliver the Strategies within the draft Regional Plan. This process should define time frames, responsibilities, and resources.

RECOMMENDATION 3 — To highlight the underlying purpose of the proposed new approach to planning, add an Objective explicitly aimed at ensuring the Central Coast has sufficient employment land and housing supply to meet demand and keep housing affordable.

RECOMMENDATION 4 – To avoid unintended consequences from uncertainty, replace Objective 3 with an Action to collaborate with community, councils and industry to develop the concept of a 15-minute neighbourhood and 30-minute community, with a proposal to be considered by the UDP Committee by the end of 2023.

RECOMMENDATION 5 – To ensure suitable housing diversity, the Regional Plan should include measurable Actions to address the shortfall in supply for seniors living.

RECOMMENDATION 6 – To more smoothly move the region toward the supply of a more diverse range of housing typologies and generally higher density in appropriate locations, provide density targets for each growth area in the short, medium and long terms, and develop a series of measurable and achievable Actions in consultation with industry and council.

RECOMMENDATION 8 – To provide certainty for development and biodiversity outcomes, make clear that the question of biodiversity "avoidance" should be addressed during rezoning and then the issue of avoidance should not be re-opened; the only biodiversity issue to be addressed during the development assessment stage should be minimising and offsetting requirements.

RECOMMENDATION 9 – To provide more certainty for land use planning and to encourage landowners in high value corridors to participate in the offset credit trading market, the Regional Plan should include an Action to deliver a Regional Biodiversity Conservation Plan in consultation with stakeholders including industry.

Focus Area #2: Providing transparency, certainty and accountability in the process

RECOMMENDATION 10 – To enable success under the new approach, the UDP must be strengthened through a set of specific actions that ensure it has transparency, accountability, authority and adequate resourcing.

RECOMMENDATION 11 – To provide transparency and support accountability, in addition to publishing the Annual Report and Sequencing and Delivery Report every year, DPE should create a live and interactive Central Coast UDP Dashboard by the end of 2022 (modelled on the Greater Sydney UDP Dashboard) with data updated at least quarterly.

RECOMMENDATION 12 – To more accurately reflect the concept of "development ready land", define the 0-5 Year pipeline of development ready land as "zoned and fully serviced **with biodiversity arrangements in place**".

RECOMMENDATION 13 – To keep the UDP accountable, provide 15-year projections or targets for number of dwellings (housing supply) and hectares of employment land, including a 100% contingency on housing supply to maintain housing affordability. The UDP should publish an annual scorecard of land capacity benchmarks against the supply targets, and report to Ministers on annual progress with published recommendations for infrastructure investments and other measures necessary to maintain adequate supply.

RECOMMENDATION 14 – To support better coordination of infrastructure with the supply of new homes, the NSW Government should give meaningful weight to the UDP's recommendations and integrate them into funding governanc and policy processes.

RECOMMENDATION 15 – To support the substantial increase in responsibilities needed to successfully deliver the Central Coast Regional Plan, DPE must commit adequate additional resourcing especially for the expanded duties related to the UDP and Place Strategy Group.

RECOMMENDATION 16 – To avoid unintended consequences and ensure the process under the 'infrastructure first, place-based framework' is successful in maintaining a healthy pipeline of development ready land without increasing time, cost or uncertainty, fundamental issues must be addressed in consultation with stakeholders including industry before the Regional Plan is finalised.

RECOMMENDATION 17 – To provide transparency and set expectations for future decision making, provide a clear explanation of the criteria and process for choosing the Regionally Significant Growth Areas and District Planning Priorities.

RECOMMENDATION 18 – To provide transparency and ensure all data inputs are accurately captured, establish a formal subcommittee of the UDP Committee to finalise the infrastructure assessment framework, to include and other industry committee members.

RECOMMENDATION 19 – To ensure a transparent place strategy evaluation process and provide more certainty for investment, the Regional Plan should provide more detail on the full and measurable criteria against which the UDP will determine place strategy sequencing.

RECOMMENDATION 20 – To avoid unintended consequences and provide certainty for investment, DPE should produce a defined standard template for the PDG place strategy process. The process should be explicit that plans, studies and reports utilised in the place strategy process are not reprosecuted, devalued or required to be revised at rezoning or DA stage and that the biodiversity "avoid" question is explicitly turned off after it is answered the first time.

RECOMMENDATION 21 – To ensure the PDG and place strategy process improves on the overall time and costs of the existing planning system, the Regional Plan must include statutory timeframes for agency responses and delivery of milestones, and a clear escalation pathway to the PDU with defined triggers to ensure the process stays on track.

RECOMMENDATION 22 — To provide transparency and accountability, develop an indicative cost template for delivering a place strategy that outlines which party would be responsible for which elements and where funding will be sourced.

RECOMMENDATION 23 – To support delivery of areas with fragmented ownership, DPE should chair the PDG, and council forward-funding of the place strategy process should be encouraged.

RECOMMENDATION 24 – To provide certainty and keep the place strategy process on track, clearly define the triggers for escalation to the PDU and beyond to the Secretary and Minister, in the context of meeting specific time and input milestones.

RECOMMENDATION 25 – To provide certainty and ensure the process is an improvement on the current system, the place strategies must be very clear in what will satisfy the question of "consistent with" for the purposes of rezoning, and an appeal pathway should be provided. The place strategy endorsement should apply for planning proposals lodged within a defined period of years, e.g., five years, and biodiversity avoidance and additional technical studies and concurrence and referrals should not be required for a planning proposal during that timeframe.

RECOMMENDATION 26 — Taking into account appropriate probity requirements, proponents and landowners should have a direct seat on the relevant PDG and full transparency should be afforded to them. The role of proponents in developing place strategies should be clearly defined.

RECOMMENDATION 27 – To ensure fairness, the PDG place strategy process should be an option, not a requirement, for proponent-led growth areas. DPE should chair all PDGs for all sites, and the escalation pathway should apply for every area undergoing a PDG place strategy and infrastructure delivery plan process.

RECOMMENDATION 28 — To support adequate supply of housing and employment land, the UDP should endeavour to unclog the development pipeline by preparing a change management plan for projects in the current pipeline. Zoned but constrained sites should be offered the Place Delivery Group process, and DPE should partly fund the development of the place strategy and infrastructure delivery plan for these sites.

Focus Area #3: District Planning and Growth Areas

RECOMMENDATION 29 – To provide more certainty about the planning pathway, clarify where the 'commitment for Gateway determination' applies within the regions.

BACKGROUND

Changed Circumstances: Higher Demand and Depleted Supply

This five-year review of the Central Coast Regional Plan is timely and necessary to capture recent changes in circumstances. The Central Coast is growing rapidly, and demand for housing and employment land has accelerated since the adoption of the existing *Central Coast Regional Plan 2036* in 2016.

Throughout the Central Coast, demand for housing and employment land has increased to unprecedented levels in recent years. Developers report long wait lists for any new housing and almost every development industry consultant in the region is currently reporting strong enquiry and overflowing workloads. Higher demand for housing is attributed not only to low interest rates and government incentives, but also to trends responding to the pandemic, with migration away from Sydney's higher density and costs to the Central Coast for more affordable lifestyle and space. Sydney's outward migration was confirmed in our URBIS Home Purchaser Sentiment Survey 2021¹, where 33% of Sydney respondents indicated an interest in moving outward whether to outer suburbs or to the regions.

Improved connectivity out of Sydney via the \$3 billion NorthConnex project and M1 improvements have made the Central Coast even more attractive for employment land since the *Central Coast Regional Plan 2036* was adopted. Recent market activity, such as \$120 million in sales for employment land at Jilliby², \$18.5 million sale for 20 ha of undeveloped industrial land in Halloran³ and other sales indicate that employment land is in high demand on the Coast.

In response to high demand over the past two years, developers have sought to increase production where possible, bringing forward planned stages to deliver more dwellings or employment land to the market sooner. Unfortunately, resource issues at Central Coast Council have prevented approvals from converting to target completion numbers, and approvals themselves are slowing.

As a result, the Central Coast is falling behind on meeting its supply needs as judged by market indicators of demand. Housing affordability has eroded on the Central Coast at a faster pace than in Sydney. We are now seeing clear signs of housing stress on the Coast not seen before that are worse than what we are seeing in Sydney. Residential vacancy rates are at less than 1% compared to Greater Sydney at 2.1%.⁴ House value growth⁵ and rental price growth⁶ have risen higher than Greater Sydney as well.

¹ UDIA 2021. <u>UDIA/URBIS Home Purchaser Sentiment Survey 2021</u>

² AFR 2022. Winarch makes \$120m flipping Central Coast industrial site

³ RealCommercial 2022. <u>147 Mountain Road, Halloran, NSW 2259 - Industrial & Warehouse Property For Sale</u>

⁴ SQM Research 2022.

⁵ CoreLogic 2021

⁶ CoreLogic 2021

In short, prolonged baseline demand has consumed much of the available short term housing pipeline and has exacerbated housing affordability issues on the Coast. A large proportion of the residential development projects in the remaining pipeline are constrained by enabling infrastructure or biodiversity issues and cannot be relied upon for supply unless those constraints are resolved. UDIA's Greenfield Land Supply Pipeline Report 2021⁷ estimates that the Central Coast will fail to meet demand in greenfield lot supply by 10% every year from FY22-29. This chronic undersupply will put increased upward pressure on local house prices over the next seven years, just as the NSW Government is looking to the Coast to supply housing that is affordable within the Sydney Megaregion, soon to be assessed under the new Greater Cities Commission (GCC).

There are some unique challenges presented in the Central Coast given the severe financial and resourcing constraints currently facing the Central Coast Council. It took several years since amalgamation for council to produce a bare-minimum consolidated LEP that leaves important issues still unresolved. It is encouraging that the consolidated LEP is now with DPE for endorsement and should be determined soon, but then council has a big job to comprehensively update its LEP to align with current strategic plans. Industry is frustrated by the slow progress on the LEP, which makes it difficult to progress development projects and we recommend DPE provide resources to assist in delivering a new Central Coast LEP.

From our regular dealings with the Central Coast Council, we are aware that their severe financial situation means that they are unwilling to accept new assets on their balance sheet, due to the impact of increasing depreciation and maintenance cost to their Profit and Loss account. This is a very difficult situation, which we are told is likely to be the case for many years. The draft RP will fail if an alternative solution cannot be found.

With borders reopening, demand for new housing is expected to continue to grow throughout the Megaregion, and the NSW Government is looking to the Central Coast as a critical player in supplying the new housing and jobs needed for that expanded east coast powerhouse. Unfortunately, unless major changes are made to better support delivery of supply, the Coast will fall short of being able to provide the housing and employment land needed to realise the potential of both the Central Coast region and the Greater Sydney Megaregion.

A New Approach: Better, Worse, or Same but Different?

would like to see the Central Coast achieve the vision and objectives articulated in the draft *Central Coast Regional Plan 2041*. We are encouraged by the draft RP's new ideas aimed at aligning land use and infrastructure planning and the focus on early cross-government collaboration to streamline the delivery of new places. Done well, the establishment of an Urban Development Program along with the concepts of the Place Delivery Group and place strategy planning have the potential to create an improved system of mutual understanding and good faith cooperation between all the players in the planning system that better supports the delivery of housing and employment land supply. On the other hand, if done poorly, the process could simply become another layer in the planning system that adds time, cost and uncertainty to the overall planning system.

Overall, the draft RP lacks important details and accountability measures needed to support informed investment decisions. For example, the draft RP does not provide direction on population, dwelling and jobs projections or targets; how to achieve a 15-minute neighbourhood; or density targets for the region's growth areas.

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⁷ UDIA 2021. <u>Greenfield Land Supply Pipeline Report</u>

The draft RP notes that it has been prepared in conjunction with Transport for NSW's (TfNSW) draft *Central Coast Regional Transport Plan* (RTP). Disappointingly, the draft RTP has not yet been released, making it impossible to judge whether the RTP and RP will support each other and thereby align Government investment to support growth in the region.

Together with the lack of detail on how sequencing and prioritisation decisions will be made, and how the Place Delivery Group and place strategy process will work, we are concerned that the draft RP could unintentionally undermine investor confidence for the Central Coast.

Given the importance of the Regional Plan in guiding investment, the new approach must be carefully crafted to ensure it helps, rather than hinders, the region's growth. We feel more work is required to agree on the detail about how the process will work. This submission outlines our initial recommendations on where to focus that work. would like to collaborate with DPE to address the issues we have raised as the Regional Plan is finalised.

While shares the ambitions of the draft Regional Plan and believes the proposed approach has merit, the draft leaves too many important questions unanswered to give us confidence it can deliver the housing and employment land needed to support the Central Coast's growth through 2041. Fundamental issues must be satisfactorily addressed in consultation with the development industry before implementation of the Regional Plan.

FOCUS AREA #1: SETTING MEASURABLE GOALS AND REFINING OBJECTIVES

The draft Central Coast Regional Plan 2041 proposes a series of Objectives against which future development proposals will be assessed. The draft RP also proposes a new approach to planning for future growth areas by establishing a Central Coast Urban Development Program (UDP) and using a new Place Delivery Group (PDG) to develop place strategies in collaboration with stakeholders. The Objectives would be used in considering whether to escalate a place strategy process issue to the Planning Delivery Unit (PDU) at DPE.

The draft RP does not offer any targets or projections for future population or number of jobs or dwellings. Some of the Objectives speak to a quantifiable idea; however, they do not provide detail on how development proposals will be measured against the Objectives, nor any Actions to achieve the Objectives.

considers that the Objectives must be measurable to provide certainty for proponents, and the Regional Plan should provide targets to give confidence for investment and to track the progress of the Regional Plan.

We offer our comments on measurements as well as each of the eight draft Objectives and propose an additional Objective on housing affordability.

Measurements

The draft RP does not provide projections or targets for population, dwellings, jobs or density locations. The only real place-based guidance provided is around the envisioned proportion of future greenfield vs infill in the Districts, and initial thinking on how the "15-minute neighbourhood" idea may play out. Overall, the draft RP aspires to meet its broad Objectives through a new flexible approach that could theoretically accommodate any future growth scenario.

appreciates flexibility to accommodate the potential for high growth. However, we are concerned that by being silent on projections/targets and other important details, the draft RP fails to provide a platform for accountability. believes that projections or targets for population, dwellings, jobs and density levels in specific locations should be provided by the NSW Government and detailed in the Regional Plan to help guide council and give industry more certainty and confidence to invest. Providing this shared foundation of understanding will also make it easier for the Central Coast UDP to agree on prioritisation decisions that are supported by council, agencies and industry.

The Regional Plan should provide the clear strategic direction that council needs to guide its local planning, and that industry needs to guide investment decisions.

RECOMMENDATION 1 - To provide industry with confidence to invest and to guide council, the Regional Plan should include population, dwelling, density and jobs projections or targets; and Actions to direct council on what is required in their local strategies to be consistent with the Regional Plan, when this must occur and how councils will be held accountable.

considers that the Objectives of the draft RP are generally agreeable. Each of the Objectives includes Strategies meant to support their achievement. The Strategies themselves provide insight into what is envisioned; however, they generally lack quantifiable direction and lead to more uncertainty.

UDIA recommends that each Strategy should be broken down to be Specific, Measurable, Accurate, Realistic and Time-Based (SMART). This analysis would determine a series of Actions with the necessary detail to provide certainty and accountability for the Strategies of each Objective.

RECOMMENDATION 2 — To provide more certainty and accountability, apply the SMART methodology to outline Actions to deliver the strategies within the draft Regional Plan. This process will define time frames, responsibilities, and resources.

Objectives

Proposed new Objective: Sufficient housing supply to meet demand

With the Central Coast facing constraints on housing supply and experiencing an alarming rate of housing price increases, recommends that the Regional Plan should include an Objective explicitly aimed at promoting sufficient housing supply, to keep downward pressure on affordability over time. While we recognise that the proposed approach to land use planning has this goal imbedded in it, we believe that the Regional Plan should be unequivocal that a clear Objective is to ensure the Central Coast has adequate housing supply to meet demand and keep housing affordable.

As noted previously, the undersupply of serviced land in the Central Coast is well documented, including in:

- The NSW Regional Housing Taskforce's Recommendations Report (DPE, October 2021)
- Building Blocks Central Coast Region report (UDIA, 2021)
- Greenfield Land Supply Pipeline Report (UDIA, 2021)

The National Housing Finance & Investment Corporation (NHFIC) released its "State of the Nation" report in February which highlights the critical importance of moving now to bolster housing supply to avoid a massive imbalance and a further surge in house prices as the economy recovers and immigration returns to normal levels.

What is clear from own research is that during COVID, even with the drop in demand for new dwellings through reduced migration, the total demand for new and existing housing still outstripped total supply in the market and the increase in housing prices continued unabated. The NHFIC report data confirms that this is likely to only get worse.

will continue to work with the Federal and NSW Governments on actions to assist with housing supply focused on three important deliverables that the Regional Plan should explicitly incorporate:

- 1. Accelerate rezoning for land that can be serviced at no cost to government
- 2. Provide funding for enabling infrastructure that will unlock housing supply
- 3. Bring a more strategic approach to addressing biodiversity issues

RECOMMENDATION 3 - To highlight the underlying purpose of the proposed new approach to planning, add an Objective explicitly aimed at ensuring the Central Coast has enough housing supply to meet demand and keep housing affordable.

Objective 1: Leverage connectivity for jobs and prosperity

agrees with this Objective. Connectivity to and from the Central Coast has improved recently with the completion of NorthConnex and M1 upgrades. However, connectivity within and throughout the Coast is notoriously challenging and slow to improve.

is keen to work with the NSW Government to leverage improvements in connectivity, including faster or fast rail. Increasing density with Transit Oriented Development (TOD) around stations should be supported, and we are encouraged that the draft RP highlights that fast rail will bring opportunities for coordinated placemaking in centres and along the corridor.

We support Strategy 1.1. which calls for additional industrial capacity at interchange locations. We note that development ready employment land supply is severely lacking on the Central Coast.

Objective 2: Ensure economic self-determination for Aboriginal communities

agrees with this Objective. Darkinjung Local Aboriginal Land Council (LALC) is an active member. We would welcome additional engagement with LALCs across NSW, perhaps facilitated by DPE, to help identify development opportunities to realise economic and environmental benefits for their communities.

Objective 3: Create a 15-minute region made up of mixed, multi-modal, inclusive and vibrant local communities

is wary of Objective 3. We question its achievability, and we believe it could inhibit the delivery of much needed housing supply in the short term.

The Objective applies several new considerations for a development proposal:

- Strategy 3.1 states that development proposals will need to demonstrate how various employment, commercial, community, recreation and education services will be located within 15-minute walking (urban contexts) and cycling (suburban contexts) trips of housing in residential and mixed-use zones, with achieved densities that allow for such local uses to succeed and flourish.
- Strategy 3.5 states that development proposals will need to be considered in the context of the 30-minute connected communities context, including considering a mix of uses, distances between uses, directness and the experience in moving between uses, with public transport having a service level that strategically supports the type of mobility shift and easy accessibility to needs that is contemplated in Objective 3.
- Strategy 3.8 states that development should enable direct connections for walking, cycling
 and public transport between precincts and into centres. Larger scale development should
 facilitate a network that provides seamless connectivity to transport network with multiple
 access points to walking, cycling, and public transport.

It is explained that the 15-minute concept will vary across different contexts. However, the draft RP merely offers a vision of how it might play out, saying that the "intent is to continue to develop the concept in partnership with community, councils and industry in order to create a 'fine grained' approach."

appreciates the intention to engage with industry on further concept development; however, the lack of current detail introduces significant uncertainty in the planning process.

We are highly concerned that Objective 3 will be difficult to meet and will set up development proposals for refusal. While the concept sounds attractive from a liveability perspective, the reality is that a 15-minute neighbourhood requires infrastructure that councils will have to deliver. It will also need community buy-in that councils will have to navigate.

We already know that Central Coast Council cannot keep up with delivering local infrastructure, especially now with Council's significant financial difficulties. We also know that the Coast community is reluctant to embrace higher density. How will these hurdles be overcome?

Most Councils do not spend their infrastructure contributions because they are waiting for almost all the contributions to be received before building the infrastructure. In our Pre-Budget <u>submission</u> to the NSW Treasurer, has proposed the NSW Government creates a \$100m self-replenishing Council Enabling Infrastructure Fund to support councils in bringing forward enabling infrastructure with future infrastructure contributions used to replenish the fund. If this is established, it could assist in delivering local infrastructure in proactive council areas. Unfortunately, not all councils are willing to use available tools that would support development. This is an especially acute problem for Central Coast Council, which is currently avoiding any expenditure that would require ongoing costs, such as maintenance on the balance sheet.

At the end of the day, it all depends on council's willingness to support a new proposal, and the 15-minute neighbourhood metric could simply become another reason to say no to an otherwise good proposal.

RECOMMENDATION 4 – To avoid unintended consequences from uncertainty, replace Objective 3 with an Action to collaborate with community, council and industry to develop the concept of a 15-minute neighbourhood and 30-minute community, with a proposal to be considered by the UDP Committee by the end of 2023.

Objective 4: Plan for "Nimble Neighbourhoods", diverse housing and sequenced development

While supports the intent of Objective 4 – especially the focus on creating more diverse housing choices, increasing housing affordability, supporting the viability of public transport and reducing cardependency – once again, we are wary of its application and potential to inhibit much-needed housing supply, especially in the short term.

The draft RP proposes a dramatic change in density for the region, calling for 50-75 dwellings per hectare of developable land. We request clarification as to whether this is "per net developable ha" of residential zoned land or "per gross developable ha" of residential land? At the industry workshop in February, it was stated that 42 dwellings per ha were being achieved in Wadalba. If this is calculated per ha of net developable land, this equates to an average lot size of 238m2. We do not believe this is correct as the current average lot size based on current developments is approximately 400m2 which equates to 25 dwellings per net developable ha of residential land. Based on real estate data the ideal lot size to meet demand in the Wadalba/Woongarrah/Warnervale area is 350m2 to 450m2.

We note that most greenfield developments are currently based on 10-15 dwellings per gross developable ha of residential land.

The higher density is in sharp contrast to current density levels of 10-15 dwellings per hectare in the Central Coast's R1 and R2 zones. Proposals for development less than this range would require justification to show how the proposal would "still achieve the outcomes" listed, all of which are designed in circularity around the higher density benchmark. There are no steps outlined as to how to achieve the change.

Certainly, such high-density benchmarks cannot possibly be achieved in every context, nor would a community want them to be. While the draft RP acknowledges this, there is no detail to give guidance to council, the community or development industry about where and how to achieve this density. One logical path would be to leave the detail to council to spell out in its Local Environmental Plan (LEP) as guided by their Local Housing Strategy, but no clear direction is provided.

The Central Coast is already suffering under uncertainty because of the delay in consolidating and comprehensively updating its LEP since amalgamation. This Objective adds more uneasiness in the development industry: without clarity on where the higher density is desired or how to achieve it, Objective 4 raises significant uncertainty. It can be another reason to refuse consent for an otherwise good proposal that would meet demand for the housing typology stock the local market is seeking.

Strategy 4.4 does provide new targets for affordable housing which are welcomed. Industry welcomes the opportunity to collaborate with government to provide more affordable and social housing where possible.

is fully supportive of efforts to prioritise the provision of more diverse housing typologies and we are generally supportive of moving toward relatively higher densities. We simply note that high demand for housing on the Coast is expected to continue along trends responding to the pandemic, with migration away from Sydney's higher density and costs to the Coast for more affordable lifestyle and space. With borders reopening, demand for new housing overall will continue to grow. Demand on the Central Coast for affordable lifestyle and additional space is already beyond our current capacity to supply, and the demand will not diminish. The Central Coast must be able to respond to market demand and supply true housing diversity across all typologies at least at a relatively affordable price.

Seniors Living

We are concerned with the undersupply of housing designed for seniors on the Central Coast.

The 2009 Gosford City Council report into ageing detailed that the then-region was already grossly deficient in catering for the aging population. The Woy Woy Peninsula alone had a projection in 2020 of 3,500 people requiring seniors' accommodation.

Across the Central Coast, DPE and Council have had a lack of vision to plan for areas where senior housing can be built; in fact, zoning and other constraints have increased to limit possibilities of providing seniors housing in areas alongside communities where the people have resided. The draft RP does not address this failure on the Coast.

Seniors living would benefit from special consideration by the UDP to determine how to accelerate delivery of more seniors housing. If alternative, suitable retirement living lands are found, this would free up the 43,000 homes occupied by 80+ year-olds through 2041, allowing families to use family homes and providing seniors dedicated housing designed for their age group, with extended family and friends living nearby.

Our members report that demand from local seniors seems to favour villa-style accommodation over medium to high rise apartment living. Within the 15-minute vision, greater emphasis could be placed on releasing land within communities to cater for seniors with 'specific to age' housing in areas adjacent to where they have lived.

The Central Coast Regional Plan 2041 is a visionary document but should be written in terms where the document holds the Council and Department to account, by achievable and measurable objectives that are benchmarked within the 20 year period. Only then will real change actually occur.

RECOMMENDATION 5 - To ensure suitable housing diversity, the Regional Plan should include measurable Actions to address the shortfall in supply for seniors living.

Such a significant movement toward higher density should be phased in through a series of Actions outlined in the Regional Plan. If the Strategies under this Objective were broken down to be Specific, Measurable, Accurate, Realistic and Time-Based (SMART), then as an example a series of Actions might provide the following detail:

• Specific – Increase the housing densities in new greenfield neighbourhoods to support public bus services by changing lot size maps in Local Environmental Plans.

- Measurable Residential densities will increase from the current average of 10 dwellings/ha
 to a minimum of 20 dwellings/ha on land zoned R1 General Residential and/or R2 Low
 Density Residential by the year 2041.
- Achievable Local Environmental Plans will be amended to remove the minimum lot size
 maps and introduce a maximum lot size map of 225sqm within two years, which then allows
 17 years to achieve the quantitative goal of an increase in 10 dwellings/ha, which is an
 increase of 0.58 dwellings/ha per annum.
- Realistic This goal of 20 dwellings/ha on land zoned R1 General Residential and/or R2 –
 Low Density Residential would significantly change the character of new greenfield
 communities. This goal is significantly less than the 50-75 dwellings per hectare target that is
 outlined in the draft plan. A gentler and more realistic approach may be to gradually
 introduce quotas for small lots (for example, as included in Lake Macquarie, Clause 4.1B),
 which would give the market an opportunity to adapt and evolve.
- Time-Based Increase the average housing density of land zoned R1 General Residential and/or R2 – Low Density Residential by 10 dwellings/ha by 2041. An annual monitoring report will be published by an independent consultant that demonstrates performance against the 0.58ha target.

would be pleased to work with DPE and councils to develop a series of Actions that could move the region toward the supply of a more diverse range of housing typologies and generally higher density.

RECOMMENDATION 6 – To more smoothly move the region toward the supply of a more diverse range of housing typologies and generally higher density, provide density targets for each growth area in the short, medium and long terms, and develop a series of measurable and achievable Actions in consultation with industry and councils.

Objective 5: Connect green infrastructure and quality public spaces to the landscape

agrees that green infrastructure connections and quality public spaces promote greater liveability and our members have a strong track record of incorporating those design principles into their developments.

We agree with Strategy 5.7 that strategic land use planning "should identify and take account of the location and extent of areas of high environmental value, including areas of potential serious and irreversible impact species, threatened species, biodiversity corridors and koala habitat." Doing this strategic work up front would provide certainty and better outcomes for the environment as well as development.

Unfortunately, to date the NSW Government has not invested in understanding the level of detail necessary to give certainty to the strategic land use planning process in this regard. For most of the Central Coast's identified urban development areas, biodiversity assessment is on a site-by-site basis under the Biodiversity Conservation Act (BC Act), Koala SEPP and any local council policies.

We strongly support Action 1 that commits DPE to "continue to progress the Central Coast strategic conservation planning program and consider opportunities to undertake further strategic conservation planning in Morisset. Timeframe: 2022/23". We are disappointed that the Central Coast

strategic conservation planning program has stalled and we strongly recommend that this work be accelerated to provide more certainty for landowners and industry.

commissioned a report⁸ last year by the ecology firm EMM to attempt to understand the quantum of biodiversity offset requirements across the residential and employment zoned land in the Central Coast and Hunter, to then calculate the cost for meeting biodiversity offset requirements for the development of that land. EMM estimated a total ecosystem offset cost of \$327 million for development across the Central Coast region.

Delivering a healthy pipeline of development ready land requires biodiversity issues to be resolved in a way that protects and enhances the biodiversity of NSW. and EMM showed that the current biodiversity offset system is holding back the supply of homes and failing to deliver good biodiversity outcomes. Resolving biodiversity issues is becoming increasingly difficult as the Biodiversity Conservation Act 2016 (BC Act) is applied to more land. Much of the Coast's housing supply delivered last year was approved under the previous biodiversity legislation and had minimal or no interaction with the BC Act. However, as those older projects are completed, the supply of new homes is under threat as new development proposals encounter significant problems in navigating the BC Act. Fundamentally, the BC Act in its current form is an obstacle to meeting the Megaregion's housing and jobs targets, due to relying on site-by-site assessment and like-for-like offsetting, and biodiversity is a major constraint to the development pipeline in the Central Coast.

In our recent NSW Pre-Budget Submission, we have recommended several steps the NSW Government should take to address biodiversity constraints, including establishing a Biodiversity Offset Bank and investing in strategic conservation planning for the Central Coast. Ultimately, the NSW Government must take a more strategic approach to deliver the Coast's biodiversity, economic and social needs and is keen to work collaboratively with Government to achieve better outcomes.

We agree with Strategy 5.8 that biodiversity issues should be addressed early in the planning process and we are encouraged by the potential of the place strategy and Place Delivery Group process to assist in that regard. We recommend that the Regional Plan state positively that the issue of "avoidance" of areas of high biodiversity value, and addressing Serious and Irreversible Impacts, should be dealt with up front during the rezoning phase (whether a place strategy is utilised or not). Once addressed during rezoning, the question of "avoidance" must be turned off for development purposes and "avoid" should not be re-opened during the development assessment stage; rather, the only issue to be addressed during the assessment stage should be minimising and offsetting.

We agree with Strategy 5.10 that development proposals should aim to strengthen biodiversity corridors as places for priority biodiversity offsets. However, we note there is a lack of detailed mapping from DPE about where biodiversity corridors of high value exist. We are disappointed that the Central Coast lacks the equivalent of a current detailed Regional Biodiversity Conservation Plan. We recommend that DPE invest in better biodiversity mapping to provide more certainty for land use planning and to encourage landowners in high value corridors to participate in the offset credit trading market. Again, we recommend applying the SMART process to outline a series of Actions to support this Objective.

RECOMMENDATION 8 - To provide certainty for development and biodiversity outcomes, make clear that the question of biodiversity "avoidance" should be addressed during rezoning and then the issue of avoidance should not be re-opened; the only biodiversity issue to be addressed during the assessment stage should be minimising and offsetting requirements.

⁸ EMM 2021. <u>Issues paper on the NSW Biodiversity Offsets Scheme</u>

RECOMMENDATION 9 - To provide more certainty for land use planning and to encourage landowners in high value corridors to participate in the offset credit trading market, the Regional Plan should include an Action to deliver a Regional Biodiversity Conservation Plan in consultation with stakeholders including industry.

Objective 6: Reach net zero and increase resilience and sustainable infrastructure

The construction, operation and maintenance of buildings accounts for almost a quarter of greenhouse gas emissions in Australia. Welcomes the NSW Government's commitment to Net Zero by 2050 and our members are undertaking significant steps to move towards that target. The draft RP "seeks to make climate change a guiding principle for all planning decisions" and suggests a number of ideas in line with the NSW Government's approach to move the industry towards Net Zero. While some of these ideas may be helpful, overall considers that the current approach by the NSW Government to move the industry towards Net Zero is currently poorly thought out and will reduce the supply of homes and worsen affordability.

Research¹⁰ undertaken by has shown that the NSW community is supportive of moving towards Net Zero in the development of new homes but is unwilling to pay a significant amount extra to achieve it. Given that NSW has some of the most expensive housing in the world this is unsurprising. If we are to achieve Net Zero, whilst avoiding reductions in the supply of new homes and increased housing costs to the homeowner, it is essential that the industry and NSW Government work together. believes that a jointly developed roadmap that looks at how we can move towards Net Zero without reducing the supply of homes or worsening affordability would encourage investment and jobs into NSW and act as an exemplar for the world. We have recommended this approach in our Pre-Budget Submission to the NSW Treasurer.

Again, we recommend applying the SMART process to outline a series of Actions to support this Objective.

Objective 7: Plan for businesses and services at the heart of healthy, prosperous and innovative communities

supports the draft RP's Objective to strengthen the role of centres and main streets. We agree that intensifying centres can make efficient use of existing infrastructure and support more public transportation, and these are the correct locations for higher density living.

We support Strategy 7.5 that seeks to deliver new early childhood education and care facilities.

Again, we recommend applying the SMART process to outline a series of Actions to support this Objective.

⁹ From leaders to majority: a frontrunner paradox in built-environment climate governance experimentation

¹⁰ UDIA 2020. <u>Home Purchaser Sentiment Survey</u>

FOCUS #2: PROVIDING TRANSPARENCY, CERTAINTY AND ACCOUNTABILITY IN THE PROCESS

strongly endorses the draft RP's recognition that NSW Government planning has failed to coordinate the provision of services and infrastructure needed to support the delivery of new growth areas and housing supply. As a result of this failure, plus challenges in addressing biodiversity, the Central Coast is falling behind on housing supply and experiencing rapidly rising house prices. This must change if the Coast is going to reach its potential as a vital part of the Megaregion.

We are supportive of an approach to delivering housing supply and growth areas that is focused on better cross-government coordination in collaboration with industry.

The draft RP proposes a new approach with a central role for a newly created Central Coast Urban Development Program (UDP) and the creation of a Place Delivery Group (PDG) that would develop place strategies for significant growth areas, working through site issues up front before rezoning occurs. This new approach endeavours to get an early agreement by public and private stakeholders on how to deliver an area and thereby achieve two important outcomes:

- a. the provision of infrastructure and services timed to support development; and
- b. streamlined rezoning and development approval processes.

fully and enthusiastically supports these goals.

We note that the draft RP has a large focus on infill developments over greenfield land release. However, the focus of 'making it happen' is about catalyst and enabling infrastructure being developed and procured during the strategic/rezoning stages. This approach may be more suited to greenfield rezoning areas, and it is unclear how the approach will apply practically to infill development. would like to work with DPE on how infill areas could be supported by this approach.

Overall, while we share the ambitions and believe the proposed approach has merit, the draft RP leaves too many important questions unanswered to give us confidence that it would be an improvement on the current planning process by reducing time, cost and uncertainty. In fact, the proposed approach has the potential to *add more* time, cost and uncertainty. Several fundamental issues must be satisfactorily addressed in consultation with the development industry before can endorse the direction of the draft *Central Coast Regional Plan 2041*.

Creating an Urban Development Program

has been a strong advocate for the creation and utilisation of a UDP Committee for many years and we are pleased that a UDP will be created for the Central Coast. We were encouraged that the *Hunter Regional Plan 2036* established the first-ever UDP for the Hunter and has been an active participant in the Hunter UDP Committee's work since it was established three years ago. We believe the UDP has great potential for cross-government coordination and collaboration with stakeholders to deliver housing and employment areas. Crucially, the Hunter UDP Committee actively seeks and is informed by industry input about the commercial realities of development, as well as the specific constraints to delivering sites. This industry input is critically important to a full understanding of what is possible to deliver and must be incorporated into the Central Coast UDP.

Notwithstanding our strong support for the creation of the Hunter UDP Committee and the efforts of the Hunter and Central Coast Development Corporation (HCCDC) in advancing the UDP Committee, we have been disappointed with its outputs so far. Presently, the Hunter UDP Committee is a great concept that has established goodwill among its participants and collected a significant amount of intelligence regarding development sites, but it has neither authority nor accountability for any deliverable outcomes. Therefore, despite the good baseline work, to date it has had little impact on housing and employment land delivery for the Hunter. We seek to apply these learnings to create a better outcome from the start for the Central Coast.

The draft RP proposes a bolder role for the new Central Coast UDP that we support: as "the NSW Government's program for managing land and housing supply and assisting infrastructure coordination in the Central Coast", the UDP "will ensure a pipeline of land is available from potential future growth areas to investigation areas and zoned and serviced land ready for new homes and jobs."

agrees this is the role of the UDP. If the settings and resourcing are appropriate, the UDP can be a game changer in delivering housing and employment land supply. As noted above, we believe it can also support delivery of infill, but more focus is needed in this regard.

To make it work, several major shifts must occur. emphasises that these elements are "must-haves" for the UDP to be successful:

- 1. Transparency and Accountability
- 2. Authority
- 3. Resourcing

RECOMMENDATION 10 - To enable success under the new approach, the UDP must be strengthened through a set of specific actions that ensure it has transparency, accountability, authority and adequate resourcing.

UDP Transparency and Accountability

commends the draft RP for committing to important reporting for the Central Coast UDP.

State and local government, utilities, industry and the community all need access to clear information to enable good decisions. As a benchmark example, is disappointed that the Hunter UDP has only published one report since its first meeting three and a half years ago, despite agreement on the importance of frequent public reporting. Future delivery efforts will fail unless transparency and reporting are delivered at a high standard.

We are pleased to read the draft RP state that the Central Coast UDP "will publicly report data on approvals and completions, and audit greenfield and infill areas." We welcome the draft RP's commitment that two reports will be delivered annually:

- 1. Annual Report on the implementation of the Regional Plan; and
- 2. Sequencing and Delivery Report including
 - Evaluation of investigation areas against a "multi-criteria analysis" (undefined)
 - o Region-wide sequencing priorities covering all place strategies
 - o Roles and responsibilities for place strategies
 - o Resourcing, collaboration and funding agreements

These are essential deliverables for DPE and must be adequately prioritised and resourced.

To support informed decisions, recommends additional reporting. DPE has created development data dashboards for the Greater Sydney and Illawarra Shoalhaven UDPs. This effort should be expanded to include the Central Coast and Hunter by the end of 2022. The dashboard should show the full development pipeline for residential, business and industrial purposes, reporting on the following categories:

- a. Completed
- b. Under Construction
- c. DA Approved
- d. Zoned and serviced with biodiversity arrangements in place
- e. Zoned, but not approved
- f. Gateway Determination
- g. Identified in a Land-Use Strategy
- h. Land for Future Investigation

In reporting on approvals and completions, the dwelling density should also be reported.

There are limitations to the Greater Sydney and Illawarra Shoalhaven dashboards that should be improved upon, including for the Central Coast and Hunter. Some information is updated only annually, and we encourage DPE to provide quarterly updates on all data via the dashboard. We also note the current dashboards do capture density in terms of typology, but do not capture status of infrastructure provision, biodiversity arrangements, or any pre-Gateway sites. Making these improvements and having this "one source of truth" will allow all stakeholders to make better decisions together.

RECOMMENDATION 11 - To provide transparency and support accountability, in addition to publishing the Annual Report and Sequencing and Delivery Report every year, DPE should create a live and interactive Central Coast UDP Dashboard by the end of 2022 (modelled on the Greater Sydney UDP Dashboard) with data updated at least quarterly.

The UDP must be accountable to a set of measurable metrics. The draft RP indicates that the UDP will oversee a pipeline of housing and employment land supply, and DPE staff have stated that the UDP will be the 'custodian' of the development pipeline.

However, how will success be measured for this responsibility? The draft RP proposes UDP benchmarks to measure the "10-15 years of land capacity required at any one time", being 0-5 years of zoned and fully serviced land; 6-10 years of zoned and part serviced; and 10-15 years of future investigation land.

is strongly supportive of thinking about the pipeline not just in terms of zoned land, but also in terms of its viability to supply the market, i.e., measuring the supply of *development ready land*: including servicing/infrastructure provision is a good start to a much more realistic way of considering the supply pipeline, and the definition should also include the status of biodiversity arrangements.

However, the draft RP does not provide any supply projection/target numbers with which to employ the pipeline benchmarks. How big should the pipeline be? How will DPE measure the land capacity "required at any one time"? We believe that a contingency buffer should be built into the pipeline to allow market levers to operate efficiently and add to supply in times of high demand. This is needed for both residential and employment land.

research partner Research4 has shown that to keep prices affordable, a housing market must have double the capacity of development ready land compared to current demand. This capacity contingency allows developers to quickly meet demand with development ready supply, keeping prices stable. The lag time in developing new housing supply means that, unless the housing market is primed now with strategies to support supply that can quickly match a change in demand, we will see increasingly chronic affordability issues on the Central Coast. As we have witnessed locally in the past two years, prices will rise sharply in times of high demand without this contingency supply buffer.

Likewise for employment land, a buffer must be built into projections to capitalise on employment growth opportunities. There is very high demand for employment land right now on the Central Coast. We do not agree with the Employment Lands Monitor or Central Coast Council that the pipeline for employment land on the Coast is adequate. Those analyses rely on an average take-up rate between 2010 and 2019, before the completion of NorthConnex and before the higher demand we are currently experiencing since the pandemic. Looking back offers some insight, but forward planning must include a contingency supply buffer to account for new growth in demand, to combat housing affordability pressures.

To apply the concept of development ready land more effectively, the following actions should be taken:

- i. Add biodiversity approval, which is equally important to infrastructure/servicing in terms of being able to deliver development ready land. The 0-5 year benchmark should be stated as "zoned & fully serviced with biodiversity arrangements in place".
- ii. The Regional Plan should provide the 15-year housing target/projection.
 - a. This should be expressed as number of dwellings.
 - b. The target/projection should include a supply contingency of 100% to keep housing affordable in response to market conditions.
 - c. The UDP should monitor and report density levels for approvals and completions by area, giving the UDP the necessary data with which to recommend adjustments.
- iii. The Regional Plan should provide the 15-year employment land target.
 - a. This should be expressed in hectares.
 - b. The target should include a supply contingency of 100% to enable capitalisation of employment generating opportunities as soon as they arise.

The UDP should therefore be held accountable for maintaining the land capacity benchmarks against the stated supply targets for development, with a scorecard published annually. We recommend that the UDP should report to the Minister for Planning and Homes, and the Minister for Cities, on its annual progress and publish its recommended infrastructure investments and other measures necessary to maintain adequate supply.

RECOMMENDATION 12 - To more accurately reflect the idea of "development ready land", define the 0-5 Year pipeline of development ready land as "zoned and fully serviced with biodiversity arrangements in place".

RECOMMENDATION 13 - To keep the UDP accountable, provide 15-year targets/projections for number of dwellings (housing supply) and hectares of employment land, including a 100% contingency on housing supply to maintain housing affordability. The UDP should publish an annual scorecard of land capacity benchmarks against the supply targets, and report to Ministers on annual

progress with published recommendations for infrastructure investments and other measures necessary to maintain adequate supply.

UDP Authority

The draft RP states the UDP will "ensure a pipeline of land is available". It fully supports this objective, but we are concerned to note the draft RP lacks specificity about how this will be achieved.

Last year, undertook major research with our members to identify specific enabling infrastructure on the Central Coast¹¹ that was currently a roadblock to supply and could be delivered to re-fill the development ready land supply pipeline. Our Building Blocks report identified infrastructure in the Central Coast that, if all were delivered, could fill the Coast pipeline with 13,000 residential lots and 955 hectares of employment land. The necessary infrastructure would cost \$220m with nearly half of the total required for state roads.

Historically, even when funding is available, the attempt to integrate infrastructure and the supply of homes for the Coast and across NSW has a long history with few successes and many failures. Successes have been achieved when both the political and departmental parts of the government had a can-do attitude that removed barriers such as bureaucratic processes that were getting in the way of delivery without adding significant value. Unfortunately, the current range of excuses on why infrastructure cannot be delivered in a timely way is long. Having discussed the problem with those who have been involved with successes, have has recommended to the NSW Government that it appoints a cross-departmental team tasked with coordinating infrastructure and the supply of new homes assisted by a team of external advisors with the experience of making this coordination work.

The UDP should be considered integral to making this coordination work. With proper resourcing, the UDP will provide the valuable data and specific information needed to make collaborative decisions to manage the local supply pipeline. The UDP's recommendations for infrastructure funding and other measures should have meaningful weight in Government's prioritisation and funding governance processes.

RECOMMENDATION 14 - To support better coordination of infrastructure with the supply of new homes, the NSW Government should give meaningful weight to the UDP's recommendations and integrate them into funding governance and policy processes, including possibly giving the Central Coast's Regional Infrastructure Contributions to the Central Coast UDP to allocate.

UDP Resourcing

The draft RP articulates an ambitious and significant role for the UDP which supports. Overall, the draft RP envisions that DPE will be responsible for myriad substantial - and in notable cases, sizeable new – tasks related to the UDP and the new approach to planning including:

- chairing the UDP
- monitoring
- reporting
- developing an infrastructure assessment framework
- applying the multi-criteria analysis to establish place strategy sequencing

¹¹ UDIA 2021. <u>Building Blocks – Central Coast Report</u>

- chairing Place Delivery Groups (PDG) to lead or support the preparation of place strategies for growth areas
- endorsing place strategies

We have also recommended specific enhanced monitoring and reporting that must be delivered to enable transparency and accountability and support good decision making.

We are concerned that without proper additional resourcing at DPE, the ambitions outlined in the draft RP will be unachievable. In the first three years of the Hunter UDP's existence, DPIE produced only one Annual Report and no substantial progress was made toward unlocking the current pipeline's 41,000 Hunter homes¹² constrained by enabling infrastructure. Unfortunately, this track record gives us little faith that DPE and the UDPs will be able to keep pace with the Central Coast and Hunter's similar accelerating demand for housing and employment land.

As envisioned in the draft RP, the Regional Plan's success rests squarely with DPE. This will require a step-change increase in resourcing for the Hunter-Central Coast team, supported by priority focus from the Department's overall functions.

RECOMMENDATION 15 – To support the substantial increase in responsibilities needed to successfully deliver the Central Coast Regional Plan, DPE must commit adequate additional resourcing especially for the expanded duties related to the UDP and Place Strategy Group.

Ensuring Success for an Infrastructure First and Place-Based Framework

The draft RP outlines a new approach to planning for growth that relies on an infrastructure first and place-based framework. welcomes and supports the thinking behind this approach. We are encouraged by the direction proposed in the draft RP. However, we have concerns with the lack of detail on how the process will work. We would like to work with DPE to resolve these issues to see the successful implementation of the approach.

RECOMMENDATION 16 - To avoid unintended consequences and ensure the process under the infrastructure first, place-based framework is successful in maintaining a healthy pipeline of development ready land without increasing time, cost or uncertainty, fundamental issues must be addressed in consultation with stakeholders including industry before the Regional Plan is finalised.

The new approach states it relies on council's local strategic planning statements (LSPS) and other local strategies to identify growth areas.

A list of Regionally Significant Growth Areas and Planning Priorities is provided in the document.

Those growth areas would undergo an infrastructure assessment and then a multi-criteria analysis to establish the sequencing of undertaking place strategies. Our comments on this process are listed below, organised under each sub-section as laid out in the draft RP.

As an overall comment, seeks better transparency to understand how the Regionally Significant Growth Areas and District Planning Priorities have been determined by DPE. We note with curiosity that there are two Regionally Significant Growth Areas identified in Mid-Coast (Forester-Tuncurry and

¹² <u>UDIA Building Blocks: A Practical Approach to Infrastructure and Land Supply – Hunter Region, July 2021</u>

Taree), but nothing for Maitland, Port Stephens, or Cessnock. This seems odd considering their well-known comparative growth activity. Against what criteria have these areas been assessed to arrive at the list?

RECOMMENDATION 17 - To provide transparency and set expectations for future decision making, provide a clear explanation of the criteria and process for choosing the Regionally Significant Growth Areas and District Planning Priorities.

1. Plan for growth areas in the right ways through local strategies

This section states that councils' local strategies will identify where future urban development should occur, and that DPE will use existing strategies (even if not finalised or endorsed) to work with council to transition the growth areas to the delivery framework.

Given that important details are not provided within the draft RP on a number of fronts – including local population, dwelling, density and jobs projections – it is assumed that these matters will be decided by individual councils and expressed in their local strategies. There are no actions or timing for this to occur. How will councils be held accountable to deliver this information?

We note that Central Coast Council has not yet developed a local housing strategy, although they have recently exhibited a Discussion Paper on the topic. The timing of that Discussion Paper is misaligned with the regional planning process as it reflects the existing Regional Plan 2036, not this draft RP.

Central Coast Council is currently in administration and facing severe financial and resourcing constraints. It took several years since amalgamation for council to produce a bare-minimum consolidated LEP that leaves important issues still unresolved. It is encouraging that the consolidated LEP is now with DPE for endorsement and should be determined soon, but then council has a big job to comprehensively update its LEP to align with current strategic plans. Industry is frustrated by the slow progress on the LEP, which makes it difficult to progress development projects and we recommend DPE provide resources to assist in delivering a new Central Coast LEP.

As outlined above, believes that projections for population, dwelling, density and jobs should be provided by the NSW Government and detailed in the Regional Plan to help guide council and give industry more certainty and confidence to invest.

While we agree that better strategic planning can provide more certainty and streamline the planning process, we are quite concerned by the uncertainty DPE, and the NSW Government is presently creating. It is very difficult to make sound investment decisions when so many planning policies and strategies are changing. On top of the long list of state-wide planning reforms underway, in the Central Coast there are a series of inconsistent strategic plans to navigate including:

- Regional Plan 2041 to be delivered in 2022
- LSPS and Local Housing Strategy (outdated by the RP)
- LEP and DCP (outdated by the RP)
- Possible new overarching Greater Cities Plan to be delivered by GCC in 2024

The Regional Plan should provide the clear strategic direction that councils need to guide their local planning, and that industry needs to guide investment decisions.

We refer again to our **Recommendation #1** - To provide industry with confidence to invest and to guide councils, the Regional Plan should include population, dwelling, density and jobs projections; and Actions to direct councils on what is required in their local strategies to be consistent with the Regional Plan, when this must occur and how council will be held accountable.

2. Determine enabling infrastructure servicing and staging

This section states that an infrastructure assessment framework will be applied to investigation areas, considering the ability of each place to be supported by existing or new infrastructure, and determining the cost effectiveness of accommodating growth.

We note that an early iteration of an infrastructure assessment framework was developed for the Hunter UDP last year and applied to the Cessnock LGA as a pilot. was grateful to have visibility around that project. We shared our concerns about the pilot's limitations at the time, and DPE told us they are working on an improved framework and would be seeking our input. We assume the same framework will be utilised in both Hunter and Central Coast. We have yet to see the proposed changes to the infrastructure assessment framework.

emphasises that the framework must be developed in collaboration with the UDP Committee stakeholders including industry. We recommend the establishment of a formal subcommittee of the UDP Committee to finalise the infrastructure assessment framework; industry generally, and specifically, should be part of that subcommittee.

RECOMMENDATION 18 - To provide transparency and ensure all data inputs are accurately captured, establish a formal subcommittee of the UDP Committee to finalise the infrastructure assessment framework, to include and other industry committee members.

3. <u>Establish sequence for prioritisation of place strategies</u>

In concept, we support a multi-criteria approach to determine sequencing for developing place strategies. As suggested in the draft RP, the approach will consider not only the cost effectiveness of infrastructure servicing, but also the public benefit of providing additional homes and catalytic opportunities around regional infrastructure investments. However, we are concerned with the low level of detail provided about the multi-criteria approach. The "public benefits" consideration is written as including "number of additional homes, proportion of build to rent, social or affordable housing, delivery of public open spaces, green infrastructure, environmental benefits and quality design", yet these are not well defined, it is unknown how or against what measure these will be evaluated, and it is unclear whether this is the complete list. More detail is needed for a transparent evaluation process.

We commend the commitment to publish an annual place strategy sequencing and delivery report that includes an evaluation of investigation areas against the criteria; region-wide sequencing priorities covering all place strategies; roles and responsibilities for place strategies; and resourcing, collaboration and funding agreements. This information will be critical for transparency and accountability.

RECOMMENDATION 19 - To ensure a transparent place strategy evaluation process and provide more certainty for investment, the Regional Plan should provide more detail on the full and measurable criteria against which the UDP will determine place strategy sequencing.

4. <u>Develop place strategies to align development and infrastructure</u>

This section explains how place strategies will be developed. We have read this section in conjunction with *Appendix C: Infrastructure first and place-based delivery* and offer our consolidated comments here.

While is cautiously encouraged by the thinking behind the place strategy approach, we have a series of fundamental questions that must be addressed before we can offer our support.

We emphasise our **Recommendation 16** which calls for addressing these issues in consultation with stakeholders including industry before the Regional Plan is finalised. Doing so will help to avoid unintended consequences and ensure the infrastructure first and place-based process – including the Place Delivery Group process – is successful in reducing time, cost and uncertainty.

Below, we summarise the issues we have identified around the Place Delivery Group and place strategy process, with questions to be answered and recommendations.

Issue: Better, Worse or More of the Same?

Questions:

 What benefit will be derived from adding this new place strategy layer to the planning process?

The NSW planning system is already the lengthiest, most complex and costly in the country. We appreciate that the PDG/place strategy approach is aimed at reducing overall timeframes and costs.

We see potential benefit from the draft RP's statement that the PDG will "determine technical investigation requirements for the place strategy and remove subsequent public authority concurrences and referrals at rezoning", and that the place strategies will seek to result in upfront approvals, with planning proposals and DAs being able to be assessed concurrently.

The draft RP provides the ideas and leaves the 'how' to industry. In reality, the 'how' will be determined by infrastructure / service authorities and council through their plans, policies and funding. A significant portion of the infrastructure is too large for a single developer to provide. The process relies on service authorities and council – which is currently in administration and struggling under severe financial constraints – to forward fund the infrastructure items to ensure a 5 year pipeline of developable land. How will that funding be unlocked?

If this process is to truly result in an improvement on the current system, then it must reliably remove the duplication of effort and cumulative additive costs that the current system imposes. Given the challenging history of the NSW planning system, there are no guarantees here that give us confidence in the ability of the new approach to either reduce time and cost or ensure the appropriate infrastructure is delivered in line with development needs. DPE is asking the development industry to agree to earlier large investments of time and money and take a leap of faith that the process will deliver. The proposed approach could easily result in less certainty versus the existing Gateway process.

We need a more detailed understanding of the process before we can contemplate taking the leap.

To avoid unintended consequences and provide certainty for investment, DPE should produce a defined standard template for the PDG place strategy process so that key project management variables of responsibilities, timing and resourcing will be clear to all parties. This should include a list of all possible studies required, when they are required, the level of detail to be contained within the study and who can prepare them. Be prescriptive and do not use the terminology 'may be' or 'likely to be required' as is proposed in the LEP Plan Making Guidelines. The process should be explicit that plans, studies and reports utilised in the place strategy process are not re-prosecuted, devalued or required to be revised at rezoning or DA stage and that the biodiversity "avoid" question is explicitly turned off after it is answered the first time.

RECOMMENDATION 20 - To avoid unintended consequences and provide certainty for investment, DPE should produce a defined standard template for the PDG place strategy process. The process should be explicit that plans, studies and reports utilised in the place strategy process are not reprosecuted, devalued or require to be revised at rezoning or DA stage and that the biodiversity "avoid" question is explicitly turned off after it is answered the first time.

Issue: Time

Questions:

- How long will it take to develop a place strategy and infrastructure delivery plan?
- Who is accountable for keeping the process on track, and how will that accountability be achieved?
- What is the escalation pathway to keep the process on track?

We support the outputs of the PDG being: delivery of place strategy + delivery infrastructure delivery plan.

We appreciate that the PDG inception meeting will prepare a program and milestones to deliver the place strategy. We emphasise our comments above that a template should be developed and employed consistently that spells out timing, responsibilities, resourcing and what technical studies will be required.

The place strategy process must include mechanisms to proceed if an agency fails to respond within an appropriate timeframe. There should be clear statutory timeframes for agency responses. This is essential to ensure the place strategy process genuinely contributes to an improved timeframe for the overall planning process. If comments are not received within a reasonable timeframe, the place strategy should proceed, and the agency would have no ability to comment further during rezoning or assessment.

The draft RP states that the PDG process could be escalated to the PDU if necessary, but the escalation pathway is not well defined. Along with statutory response timeframes, the triggers for escalation should be spelled out and should include automatic escalation if an agency fails to meet the statutory timeframe for response.

RECOMMENDATION 21 - To ensure the PDG and place strategy process improves on the overall time and costs of the existing planning system, the Regional Plan must include statutory timeframes for agency responses and delivery of milestones, and a clear escalation pathway to the PDU with defined triggers to ensure the process stays on track.

Issue: Costs

Questions:

- What funding is available to deliver these place strategies?
- As an example benchmark, how much has Government spent on the Williamtown Special Activation Precinct?
- How will the PDG cost requirement be determined?
- In the case of multiple landowners, how will the PDG costs be determined and enforced, and how will the costs of studies be shared?

Based on member reports of recent experiences with new growth areas, estimates that circa \$1 million would be required to prepare a reliable place strategy that identifies water/sewer needs, biodiversity assessments, traffic assessments and urban design for a new development of around 2,000 dwellings.

This media <u>article</u> reports that the NSW Government has committed more than \$1 billion to deliver five Special Activation Precincts, which roughly equates to \$200 million per SAP. Would such resources be available to support place strategies development?

RECOMMENDATION 22 - To provide transparency and accountability, develop an indicative cost template for delivering a place strategy that outlines which party would be responsible for which elements and where funding will be sourced.

The place strategy process is required where there are more than two landowners. Noting the draft RP's objective of "supporting the role of small and medium-sized developers in providing new homes", these are often areas where such developers are active. These fragmented growth areas often stagnate because there is no lead developer or landowner who can or is willing to bear the upfront capital costs of technical studies and/or infrastructure delivery. These areas would benefit greatly from a place strategy process, yet they are the sites that are least able to fund it.

The draft RP implies the cost negotiation will be left to councils to work out with landowners. The idea of forward-funding from councils is floated. It should be acknowledged that given its current financial position, Central Coast Council has no resources to prepare place strategies.

recommends that DPE should chair the PDG for fragmented land ownership areas and council forward-funding of the place strategy process should be encouraged. The council investment could be recouped via infrastructure contributions from future development. This needs to be structured to allow for balanced accounting by council.

RECOMMENDATION 23 - To support delivery of areas with fragmented ownership, DPE should chair the PDG, and council forward-funding of the place strategy process should be encouraged.

Issue: Accountability and Escalation

Questions:

 How will the PDG ensure the process meets milestones, including in cases where stakeholders (including DPE itself) fail to provide timely inputs or fail to engage in the process with a solutions-focused mindset?

The draft RP envisions that the PDG could escalate issues to the Place Delivery Unit (PDU) at DPE. supports escalation to the PDU to assist in resolving issues. However, the draft RP's trigger of "where there are risks of not meeting objectives of the RP" is too subjective.

RECOMMENDATION 24 - To provide certainty and keep the place strategy process on track, clearly define the triggers for escalation to the PDU and beyond to the Secretary and Minister, in the context of meeting specific time and input milestones.

Issue: Removal of Gateway

Questions:

- How will "consistent with the place strategy" be defined and enforced for purposes of removing Gateway requirements?
- Will an appeal pathway be available?
- Will endorsement of the place strategy have a defined period of validity?

supports the draft RP's vision that where a place strategy has been endorsed by DPE, subsequent Gateway determination requirements will thereby be removed for rezonings. The draft states that the planning proposals must be "consistent with the endorsed place strategy" to enable this pathway.

While this sounds reasonable, we are concerned that if the question of consistency is left to the PPA, usually the local council, there will be less certainty than the Gateway process currently provides. This could introduce additional risk after the proponents have made significant early and upfront investments in the delivery of a place strategy.

If the new approach is to provide real benefit, it should pass the following test: any earlier investment in time and cost should be offset by a higher level of certainty and reduced time and costs in the end-to-end planning process.

Two assurances could be provided: provide a pathway to appeal a determination of "inconsistent"; and guarantee that issues addressed in the place strategy process – including biodiversity avoidance and technical studies – will not be prosecuted again.

RECOMMENDATION 25 - To provide certainty and ensure the process is an improvement on the current system, the place strategies must be very clear in what will satisfy the question of "consistent with" for the purposes of rezoning, and an appeal pathway should be provided. The place strategy endorsement should apply for planning proposals lodged within a defined period of years, e.g., five years, and biodiversity avoidance and additional technical studies and concurrence and referrals should not be required for a planning proposal during that timeframe.

Issue: Proponent involvement in developing place strategies

Questions

- How will the PDG and place strategy process consult with industry?
- Will DPE chair the PDG for "large growth areas" that are required to develop a place strategy?
- Is elevation to the PDU an option for "out of sequence" PDGs?

According to the sequencing recommended by the UDP, DPE will chair a PDG to develop place strategies for Regionally Significant Growth Areas from the Regional Plan, and Catalyst Areas from the Greater Newcastle Metropolitan Plan.

emphasises that proponents and landowners in these areas must be an integral part of the PDG process, where they will provide the necessary commercial reality check for the PDG, and help identify potential cost-saving synergies, for example in the case of technical studies. This is especially important where the proponents will be asked to fund any aspect of the technical studies and therefore should have transparency to and be fully involved in the PDG's work. To avoid any confusion, the role of proponents must be clearly defined.

RECOMMENDATION 26 - Taking into account appropriate probity requirements, proponents and landowners should have a direct seat on the relevant PDG and full transparency should be afforded to them. The role of proponents in developing place strategies should be clearly defined.

PDG place strategies are required for large growth areas with 2,000 or more dwellings, more than 200ha employment areas, or sites held by more than two landowners or across LGA boundaries, and these must be funded by the proponent(s).

DPE held a development industry workshop on the draft Central Coast Regional Plan and draft Hunter Regional Plan on 16 February and stated that while the above sites will be required to produce a place strategy and would have access to the PDG, DPE resourcing would "not be available". We assume this is in reference to direct funding but seek clarification that DPE would still chair the PDG in these instances.

This section raises alarms for our members about the approval process for such sites. The draft RP requires this additional place strategy process and states it must be fully funded by the proponents. Yet DPE has stated they cannot apply resources to the process. The draft RP therefore has added a significant additional lengthy and costly step to the rezoning process, but provided no extra certainty of an outcome.

RECOMMENDATION 27 - To ensure fairness, the PDG place strategy process should be an option, not a requirement, for proponent-led growth areas. DPE should chair all PDGs for all sites, and the escalation pathway should apply for every area undergoing a PDG place strategy and infrastructure delivery plan process.

Issue: Unlocking currently zoned and constrained sites

Questions:

- How will the UDP apply the infrastructure first and place-based framework to unclog the current development pipeline?
- What is the change management plan, especially for projects in the current pipeline?

The draft RP states that a place strategy is recommended for zoned sites where it could help to resolve infrastructure requirements prior to development application for subdivision. DPE staff have said that in such cases, the proponent would fund the PDG process.

Given the UDP is the custodian of the development pipeline, and many legacy sites are clogging that pipeline in large part because the NSW Government has failed to plan and deliver enabling infrastructure, it is reasonable to expect DPE to provide resourcing to unlock these areas.

RECOMMENDATION 28 - To support adequate supply of housing and employment land, the UDP should endeavour to unclog the development pipeline by preparing a change management plan for projects in the current pipeline. Zoned but constrained sites should be offered the Place Delivery Group process, and DPE should partly fund the development of the place strategy and infrastructure delivery plan for these sites.

FOCUS # 3: DISTRICT PLANNING AND GROWTH AREAS

In general, supports the move to district planning and the identified Districts for the Central Coast are mostly logical. I members will make their individual submissions to DPE about the benefits their specific projects can bring to a District and the region, and it is not place to promote one development over another.

We do have concerns and questions in this section related to transparency, consistency and accountability which are outlined below.

Regionally Significant Growth Areas and District Planning Priorities

Further to our comment under Focus #2, calls for greater transparency to understand how the Regionally Significant Growth Areas and District Planning Priorities have been chosen for each District. The RP should be clear about the planning status of the lists it includes and offer a clear explanation about how the areas were chosen. This concern is also reflected in our comments above related to the UDP and Place Delivery Group process.

We reiterate **Recommendation 17** calling for a clear explanation of the criteria and process for choosing the Regionally Significant Growth Areas and District Planning Priorities.

Local Planning

The draft RP states that "Councils will reflect the planning priorities in local strategic planning." However, there are no actions or timeframes to hold council accountable to this aspiration.

As detailed under Focus Area #2 above, we are concerned that the draft RP fails to provide enough certainty to give confidence for investment.

We reiterate **Recommendation 1**, calling for the Regional Plan to articulate projections and targets and include Actions to direct council on what is required in their local strategies to be consistent with the Regional Plan, when this must occur and how council will be held accountable.

Gateway Determination Commitment

Under the Central Lakes District, the draft RP includes a box titled 'Gateway determination commitment' that states that "planning proposals in precincts that satisfy the following criteria will be given an accelerated assessment, with an intention for a gateway determination to be issued by the department in 5 working days for land" that satisfies a list of very clear criteria. We commend DPE for providing this commitment and we seek a clarification as to whether this commitment for Gateway determination applies only in the Central Lakes District, or throughout the Hunter and Central Coast regions?

RECOMMENDATION 29 - To provide more certainty about the planning pathway, clarify where the 'commitment for Gateway determination' applies within the region.

Central Lakes District

As the draft RP recognizes, the Central Lakes District has many opportunities for both employment and housing. Significant planning has already occurred in the District. It would be helpful to understand the expected yields for each residential precinct and jobs for the employment precincts?

The District preliminary sequencing plan on page 78 provides an indication of which precincts are expected to be serviced in the short, medium and long term. The draft RP notes that detailed investigations will still be required to determine boundaries for development. Consistent with the approach outlined in the draft RP, we recommend that the UDP be utilised to finalise this sequencing.

To assist in ongoing planning, we offer the following updated information and potential inconsistencies provided by members active in the District:

- Large portions of Precinct 5 and Precinct 7 are already built or are under construction;
- The northeastern portion of residential Precinct 3A is shown as industrial in the North Wyong Structure Plan (NWSP);
- Precinct 15 is shown as employment in NWSP but residential in the draft RP; based on the draft RP's emphasis on mixed use, should both zoning categories apply?
- Precincts 16A and 16C are shown as employment in NWSP but residential in the draft RP; can this be clarified?
- Large portion of Precinct 16D is already built with mobile homes;
- Large portion of Precinct 19A and 19B is already built with mobile homes;
- Precinct 16E is partly built, including the Woolworths shopping centre;

 A portion of the Wyong Employment Zone (WEZ) west of the M1 is under construction now, however the sequencing indicates medium-term servicing between 2027-2036

Watagan District

The draft RP identifies that the Watagan District, which includes land west of the M1 motorway, "should be protected should new development fronts be required" in the future. UDIA supports the draft RP's commitment to develop a place strategy for Central Coast Plateau to ensure future decisions are informed by comprehensive data and information.

believes that the Central Coast has vast potential for growth. It seems inevitable that the area west of the M1 will play a role in supporting that growth. With a major transport like the M1, it does not make sense to have communities only positioned to the east and it is wise to start planning now for this growth. looks forward to engaging with DPE and stakeholders through the UDP and place strategy process to investigate those opportunities.

CONCLUSION

appreciates this opportunity to offer our comments and recommendations to the *draft Central Coast Regional Plan 2041*. We appreciate the innovative thinking DPE is bringing to how to plan for the region's growth. We are enthusiastically supportive of finding better processes to align infrastructure planning with development, resolve biodiversity issues early in the planning process, and streamline rezoning and development assessment.

However, while we share these ambitions and believe the proposed approach has merit, we believe the draft RP leaves too many important questions unanswered and we are not confident that, as drafted, it will deliver the necessary housing and employment land to support the Hunter's growth through 2041. It is our view that the draft RP could introduce more uncertainty in the planning process, given its lack of direction on:

- population, dwelling and jobs projections;
- density targets for the region's individual growth areas;
- how to achieve a 15-minute neighbourhood; and
- how the Place Delivery Group and place strategy process will work.

is encouraged by the process proposed in the draft RP and would like to work with DPE and councils to agree on the details and how the process can include better transparency and accountability. We call on DPE to address the fundamental issues outlined in our submission in collaboration with industry before the Regional Plan is finalised.

sees enormous potential for the Central Coast. With a major transport asset like the M1, it does not make sense to have communities only positioned to the east and it is wise to start planning now for this growth. We look forward to working closely with DPE and the NSW Government to provide for its future jobs and housing, offering choices in response to market demand for housing and employment land.

Should you have any questions or wish to arrange a meeting for further discussion, please contact





Draft Hunter Regional Plan 2041

NSW Submission

March 2022

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CONTACT

For further information about any matter raised in the submission please contact:

ABOUT THE

Established in 1963, the is the peak industry body representing the leading participants in urban development in NSW. Our more than 450 member companies span all facets of the industry including developers, consultants, local government and state agencies. We have a strong commitment to good growth in the regions. A quarter of our members are based in regional NSW, and we have active Chapters in the Hunter, Central Coast, and Illawarra Shoalhaven. Our advocacy is based on creating liveable, affordable and connected smart cities.

EXECUTIVE SUMMARY

The welcomes the opportunity to provide comments on the *draft Hunter Regional Plan 2041* (draft RP). It is pleasing to see the Department of Planning and Environment (DPE) fulfilling the commitment to a 5-year review of the *Hunter Regional Plan 2036* (2036 plan).

Already the state's largest regional economy, the Hunter is evolving and growing rapidly, and is experiencing a surge in demand for housing and employment land that is undersupplied. New opportunities are emerging to lead the state toward achieving NetZero 2050, build on the potential of the international gateways of the Port of Newcastle and Newcastle Airport, and expand advanced manufacturing and aerospace capabilities. The NSW Government's new focus on the 6 City Megaregion of Greater Sydney, Hunter, Central Coast and Illawarra is expected to accelerate this fast pace of change for the region. It is critical to plan now for this growth, to ensure the region can supply the necessary employment land to support jobs and adequate levels of housing so that it remains affordable for the local population.

This draft Hunter Regional Plan – and the *draft Central Coast Regional Plan 2041* also on exhibition – is very different from its predecessor and every other regional plan in NSW. It is not so much a review of the 2036 plan as a complete revision of it. The draft neither overtly builds upon or provides a scorecard against the 2036 plan, nor does it offer any population, dwelling or jobs targets or projections. The draft contains very few Actions, and there is no implementation plan provided. The lack of these measures makes it difficult to assess the success of the 2036 plan or evaluate the draft RP, and recommends that such metrics be added.

Despite lacking important details, the draft RP outlines a new approach to planning that could be adaptable to a range of growth scenarios. is encouraged by the new approach under the that seeks to support the production of more development ready land for housing supply and jobs in the Hunter. We applaud the new thinking that aims to create a collaborative process to resolve site constraints early and support a robust and reliable development ready pipeline for new housing and employment land, with infrastructure delivery aligned with development. We also support the draft RP's ambitions to promote more efficient land use and move away from car dependent neighbourhoods on the path to Net Zero, while increasing housing diversity, affordability, and liveability.

However, while we share these ambitions and believe the proposed approach has merit, we believe the draft RP leaves too many important questions unanswered and we are not confident that, as drafted, it will deliver the necessary housing and employment land to support the Hunter's growth through 2041. It is our view that the draft RP could introduce more uncertainty in the planning process, given its lack of direction on:

- population, dwelling and jobs projections;
- density targets for the region's individual growth areas;
- how to achieve a 15-minute neighbourhood; and
- how the Place Delivery Group and place strategy process will work.

Given the importance of the Regional Plan in guiding investment, the new approach must be carefully crafted to ensure it helps, rather than hinders, the region's growth. We feel more work is required to agree on the detail about how the process will work. These fundamental issues must be satisfactorily addressed in consultation with the development industry before can offer our support for the direction of the draft *Hunter Regional Plan 2041*.

would like to work closely and constructively with DPE to enable the successful finalisation and subsequent implementation of the Hunter Regional Plan 2041. Our submission outlines our recommendations to address these issues, broken down into three areas of focus:

- I. Setting measurable goals and refining Objectives
- II. Providing transparency, certainty and accountability in the process
- III. District planning and growth areas

While shares the ambitions of the draft Regional Plan and believes the proposed approach has merit, the draft leaves too many important questions unanswered to give us confidence it can deliver the housing and employment land needed to support the Hunter's growth through 2041. Fundamental issues must be satisfactorily addressed in consultation with the development industry before implementation of the Regional Plan.

Recommendations:

Focus Area # 1: Setting measurable goals and refining Objectives

RECOMMENDATION 1 — To provide the community with some level of clarity and industry with confidence to invest, and to guide council and ensure accountability, the Regional Plan should include population, dwelling, density and jobs projections or targets; and Actions to direct council on what is required in their local strategies to be consistent with the Regional Plan, when this must occur and how councils will be held accountable.

RECOMMENDATION 2 – To provide more certainty and accountability, apply the SMART methodology to outline Actions to deliver the Strategies within the draft Regional Plan. This process should define time frames, responsibilities, and resources.

RECOMMENDATION 3 — To highlight the underlying purpose of the proposed new approach to planning, add an Objective explicitly aimed at ensuring the Hunter has sufficient housing supply to meet demand and put downward pressure on housing affordability.

RECOMMENDATION 4 — To ensure NSW is supported with an adequate supply of construction materials, the Hunter's quarry assets should be identified, and the Regional Plan should identify measures to ensure they are able to deliver.

RECOMMENDATION 5 – The Regional Plan should consider potential future urban uses of mining assets and include an Action for DPE to work with TfNSW to consider the use of legacy coal rail lines to support the region's urban growth.

RECOMMENDATION 6 – To avoid unintended consequences from uncertainty, replace Objective 3 with an Action to collaborate with community, councils and industry to develop the concept of a 15-minute neighbourhood and 30-minute community, with a proposal to be considered by the by the end of 2023.

RECOMMENDATION 7 – To more smoothly move the region toward the supply of a more diverse range of housing typologies and generally higher density in appropriate locations, provide density targets for each growth area in the short, medium and long terms, and develop a series of measurable and achievable Actions in consultation with industry and councils.

RECOMMENDATION 8 – To provide certainty for development and biodiversity outcomes, make clear that the question of biodiversity "avoidance" should be addressed during rezoning and then the issue of avoidance should not be re-opened; the only biodiversity issue to be addressed during the development assessment stage should be minimising and offsetting requirements.

RECOMMENDATION 9 – To support better strategic outcomes for biodiversity and development, amend Action 2 to state DPE will "...consider opportunities to undertake further strategic conservation planning across the Hunter, including in Morisset."

RECOMMENDATION 10 - To provide more certainty for land use planning and to encourage landowners in high value corridors to participate in the offset credit trading market, the Regional Plan should include an Action to deliver a Regional Biodiversity Conservation Plan in consultation with stakeholders including industry.

Focus Area #2: Providing transparency, certainty and accountability in the process

RECOMMENDATION 11 – To enable success under the new approach, the UDP must be strengthened through a set of specific actions that ensure it has transparency, accountability, authority and adequate resourcing.

RECOMMENDATION 12 — To provide transparency and support accountability, in addition to publishing the Annual Report and Sequencing and Delivery Report every year, the UDP should be enabled with digital mapping technology to show where infrastructure and development can and are being delivered; and DPE should create a live and interactive Hunter UDP Dashboard by the end of 2022 (modelled on the Greater Sydney UDP Dashboard) with data updated at least quarterly.

RECOMMENDATION 13 – To more accurately reflect the concept of "development ready land", define the 0-5 Year pipeline of development ready land as "zoned and fully serviced with biodiversity arrangements in place".

RECOMMENDATION 14 – To keep the UDP accountable, provide 15-year projections or targets for number of dwellings (housing supply) and hectares of employment land, including a 100% contingency on housing supply to maintain housing affordability. The UDP should publish an annual scorecard of land capacity benchmarks against the supply targets, and report to Ministers on annual progress with published recommendations for infrastructure investments and other measures necessary to maintain adequate supply.

RECOMMENDATION 15 – To support better coordination of infrastructure with the supply of new homes, the NSW Government should give meaningful weight to the UDP's recommendations and integrate them into funding governance and policy processes, including giving the Hunter's Regional Infrastructure Contributions to the Hunter UDP to allocate.

RECOMMENDATION 16 – To support the substantial increase in responsibilities needed to successfully deliver the Hunter Regional Plan, DPE must re-prioritise resourcing especially for the expanded duties related to the UDP and Place Strategy Group.

RECOMMENDATION 17 – To avoid unintended consequences and ensure the process under the 'infrastructure first, place-based framework' is successful in maintaining a healthy pipeline of development ready land without increasing time, cost or uncertainty, fundamental issues such as sequencing criteria, escalation pathways, etc., must be addressed in consultation with stakeholders including industry before the Regional Plan is finalised.

RECOMMENDATION 18 – To provide transparency and set expectations for future decision making, provide a clear explanation of the criteria and process for choosing the Regionally Significant Growth Areas and District Planning Priorities.

RECOMMENDATION 19 – To provide transparency and ensure all data inputs are accurately captured, establish a formal subcommittee of the UDP Committee to finalise the infrastructure assessment framework, to include and other industry committee members.

RECOMMENDATION 20 – To ensure a transparent place strategy evaluation process and provide more certainty for investment, the Regional Plan should provide more detail on the full and measurable criteria against which the UDP will determine place strategy sequencing.

RECOMMENDATION 21 – To avoid unintended consequences and provide certainty for investment, DPE should produce a defined standard template for the PDG place strategy process. The process should be explicit that plans, studies and reports utilised in the place strategy process are not reprosecuted, devalued or required to be revised at rezoning or DA stage and that the biodiversity "avoid" question is explicitly turned off after it is answered the first time.

RECOMMENDATION 22 – To ensure the PDG and place strategy process improves on the overall time and costs of the existing planning system, the Regional Plan must include statutory timeframes for agency responses and delivery of milestones, and a clear escalation pathway to the PDU with defined triggers to ensure the process stays on track.

RECOMMENDATION 23 – To provide transparency and accountability, develop an indicative cost template for delivering a place strategy that outlines which party would be responsible for which elements and where funding will be sourced.

RECOMMENDATION 24 – To support delivery of areas with fragmented ownership, DPE should chair the PDG, and council forward-funding of the place strategy process should be encouraged.

RECOMMENDATION 25 – To provide certainty and keep the place strategy process on track, clearly define the guidelines for escalation to the PDU and beyond to the Secretary and Minister, in the context of meeting specific time and input milestones.

RECOMMENDATION 26 – To provide certainty and ensure the process is an improvement on the current system, the place strategies must be very clear in what will satisfy the question of "consistent with" for the purposes of rezoning, and an appeal pathway should be provided. The place strategy endorsement should apply for planning proposals lodged within a defined period of years, e.g., five years, and biodiversity avoidance and additional technical studies and concurrence and referrals should not be required for a planning proposal during that timeframe.

RECOMMENDATION 27 – Taking into account appropriate probity requirements, proponents and landowners should have a direct seat on the relevant PDG and full transparency should be afforded to them. The role of proponents in developing place strategies should be clearly defined.

RECOMMENDATION 28 – To ensure fairness, the PDG place strategy process should be an option, not a requirement, for proponent-led growth areas. DPE should chair all PDGs for all sites, and the escalation pathway should apply for every area undergoing a PDG place strategy and infrastructure delivery plan process.

RECOMMENDATION 29 – To support adequate supply of housing and employment land, the UDP should endeavour to unclog the development pipeline by preparing a change management plan for projects in the current pipeline. Zoned but constrained sites should be offered the Place Delivery Group process, and DPE should partly fund the development of the place strategy and infrastructure delivery plan for these sites.

Focus Area #3: District Planning and Growth Areas

RECOMMENDATION 30 – To provide better certainty and avoid confusion, DPE should undertake a detailed cross-reference between the actions and priorities contained within the Greater Newcastle Metropolitan Plan 2036 and the draft Regional Plan to ensure that there are not any actions that contradict one another. Provide better synergies between the two Plans where possible now, and where a change is made, provide an explanation for the change and clarity on how any inconsistencies will be managed.

RECOMMENDATION 31 – To provide more certainty about the planning pathway, clarify where the 'commitment for Gateway determination' applies within the region.

RECOMMENDATION 32 – Increase certainty by applying a consistent approach to mapping; identify land by their planning status and identify future residential land to their lot boundaries where this land has been identified in a council-endorsed land use plan.

BACKGROUND

Changed Circumstances: Higher Demand and Depleted Supply

This five-year review of the Hunter Regional Plan is timely and necessary to capture recent changes in circumstances. The Hunter is growing rapidly, and demand for housing and employment land has accelerated since the adoption of the existing *Hunter Regional Plan 2036* and its supporting *Greater Newcastle Metropolitan Plan 2036* in 2016 and 2018 respectively. Councils have also delivered new Local Strategic Planning Statements and Local Housing Strategies reflecting their particular needs.

In response to high demand over the past two years, developers have increased production where possible, bringing forward planned stages to deliver more lots to the market sooner. This is reflected in Hunter Water connection applications which are 40% higher versus the previous years' annual average.

Despite the surge in housing production over the last two years, the Hunter is falling behind on meeting its housing supply needs as judged by market indicators of demand. Housing affordability has diminished in the Hunter at a faster pace than in Sydney. We are now seeing clear signs of housing stress in the Hunter not seen before that are worse than what we are seeing in Sydney. Residential vacancy rates are at less than 1% compared to Greater Sydney at 2.1%.² House value growth³ and rental price growth⁴ have risen higher than Greater Sydney as well.

In short, prolonged baseline demand has consumed much of the available short term housing pipeline and has exacerbated housing affordability issues in the Hunter. A large proportion of the residential development projects in the remaining pipeline are constrained by enabling infrastructure or biodiversity issues and cannot be relied upon for supply unless those constraints are resolved. Greenfield Land Supply Pipeline Report 2021⁵ estimates that the Hunter will fail to meet demand in greenfield lot supply by 10% every year from FY22-29. This chronic undersupply will put increased upward pressure on local house prices over the next seven years, just as the NSW Government is looking to the Hunter to supply housing that is affordable within the Sydney Megaregion, soon to be assessed under the new Greater Cities Commission (GCC).

With borders reopening, demand for new housing is expected to continue to grow throughout the Megaregion, and the NSW Government is looking to the Hunter as a critical player in supplying the new housing and jobs needed for that expanded east coast powerhouse. Unfortunately, unless major changes are made to better support delivery of supply, the Hunter will fall short of being able to

¹ UDIA 2021. <u>UDIA/URBIS Home Purchaser Sentiment Survey 2021</u>

² SQM Research 2022

³ CoreLogic 2021

⁴ CoreLogic 2021

⁵ UDIA 2021. <u>Greenfield Land Supply Pipeline Report</u>

provide the housing and employment land needed to realise the potential of both the Hunter region and the Greater Sydney Megaregion.

A New Approach: Better, Worse, or Same but Different?

would like to see the Hunter achieve the vision and objectives articulated in the draft Hunter Regional Plan 2041. We are encouraged by the draft RP's new ideas aimed at aligning land use and infrastructure planning and the focus on early cross-government collaboration to streamline the delivery of new places. Done well, the enhanced work of the Urban Development Program along with the concepts of the Place Delivery Group and place strategy planning have the potential to create an improved system of mutual understanding and good faith cooperation between all the players in the planning system, that better supports the delivery of housing and employment land supply. On the other hand, if done poorly, the process could simply become another layer in the planning system that adds time, cost and uncertainty to the overall planning system.

Overall, the draft RP lacks important details and accountability measures needed to support informed investment decisions. For example, the draft RP does not provide direction on population, dwelling and jobs projections or targets; how to achieve a 15-minute neighbourhood; or density targets for the region's growth areas.

The draft RP notes that it has been prepared in conjunction with Transport for NSW's (TfNSW) draft Hunter Regional Transport Plan (RTP). Disappointingly, the draft RTP has not yet been released, making it impossible to judge whether the RTP and RP will support each other and thereby align Government investment to support growth in the region.

Together with the lack of detail on how sequencing and prioritisation decisions will be made, and how the Place Delivery Group and place strategy process will work, we are concerned that the draft RP could unintentionally undermine investor confidence in the Hunter.

We would like to assist DPE to address these issues as it works to finalise the Regional Plan.

Our submission outlines our initial recommendations on where to focus that work.

FOCUS AREA #1: SETTING MEASURABLE GOALS AND REFINING OBJECTIVES

The draft Hunter Regional Plan 2041 proposes a series of Objectives against which future development proposals will be assessed. The draft RP also proposes a new approach to planning for future growth areas by expanding upon the role of the Hunter Urban Development Program (UDP) and using a new Place Delivery Group (PDG) to develop place strategies in collaboration with stakeholders. The Objectives would be used in considering whether to escalate a place strategy process issue to the Planning Delivery Unit (PDU) at DPE.

The draft RP does not offer any targets or projections for future population or number of jobs or dwellings. Some of the Objectives speak to a quantifiable idea; however, they do not provide detail on how development proposals will be measured against the Objectives, nor any Actions to achieve the Objectives.

considers that the Objectives must be measurable to provide certainty for proponents, and the Regional Plan should provide targets to give confidence for investment and to track the progress of the Regional Plan.

We offer our comments on measurements as well as each of the eight draft Objectives and propose an additional Objective on housing affordability.

Measurements

The draft RP does not provide projections or targets for population, dwellings, jobs or density locations. The only real place-based guidance provided is around the envisioned proportion of future greenfield vs infill in the Districts, and initial thinking on how the "15-minute neighbourhood" idea may play out. Overall, the draft RP aspires to meet its broad Objectives through a new flexible approach that could theoretically accommodate any future growth scenario.

appreciates flexibility to accommodate the potential for high growth. However, we are concerned that by being silent on projections/targets and other important details, the draft RP fails to provide a platform for accountability. believes that projections or targets for population, dwellings, jobs and density levels in specific locations should be provided by the NSW Government and detailed in the Regional Plan to help guide councils and give industry more certainty and confidence to invest. Providing this shared foundation of understanding will also make it easier for the Hunter UDP to agree on prioritisation decisions that are supported by all LGAs and industry.

The Regional Plan should provide the clear strategic direction that councils need to guide their local planning, and that industry needs to guide investment decisions.

RECOMMENDATION 1 - To provide the community with some level of clarity and industry with confidence to invest, and to guide council and ensure accountability, the Regional Plan should include population, dwelling, density and jobs projections or targets; and Actions to direct council on what is required in their local strategies to be consistent with the Regional Plan, when this must occur and how councils will be held accountable.

considers that the Objectives of the draft RP are generally agreeable. Each of the Objectives includes Strategies meant to support their achievement. The Strategies themselves provide insight into what is envisioned; however, they generally lack quantifiable direction and lead to more uncertainty.

recommends that each Strategy should be broken down to be Specific, Measurable, Accurate, Realistic and Time-Based (SMART). This analysis would determine a series of Actions with the necessary detail to provide certainty and accountability for the Strategies of each Objective.

RECOMMENDATION 2 — To provide more certainty and accountability, apply the SMART methodology to outline Actions to deliver the strategies within the draft Regional Plan. This process will define time frames, responsibilities, and resources.

Objectives

UDIA Proposed new Objective: Sufficient housing supply to meet demand

With the Hunter facing constraints on housing supply and experiencing an alarming rate of housing price increases, UDIA recommends that the Regional Plan should include an Objective explicitly aimed at promoting sufficient housing supply, to keep downward pressure on affordability over time. While we recognise that the proposed approach to land use planning has this goal imbedded in it, we believe that the Regional Plan should be unequivocal that a clear Objective is to ensure the Hunter has enough housing supply to meet demand and keep housing affordable.

As noted previously, the undersupply of serviced land in the Hunter is well documented, including in:

- The NSW Regional Housing Taskforce's Recommendations Report (DPE, October 2021)
- Building Blocks Hunter Region report 2021)
- Greenfield Land Supply Pipeline Report , 2021)

The National Housing Finance & Investment Corporation (NHFIC) released its "State of the Nation" report in February which highlights the critical importance of moving now to bolster housing supply to avoid a massive imbalance and a further surge in house prices, as the economy recovers and immigration returns to normal levels.

What is clear from own research is that during COVID, even with the drop in demand for new dwellings through reduced migration, the total demand for new and existing housing still outstripped total supply in the market and the increase in housing prices continued unabated. The NHFIC report data confirms that this is likely to only get worse.

UDIA will continue to work with the Federal and NSW Governments on actions to assist with housing supply focused on three important deliverables that the Regional Plan should explicitly incorporate:

- 1. Accelerate rezoning for land that can be serviced at no cost to government
- 2. Provide funding for enabling infrastructure that will unlock housing supply
- 3. Bring a more strategic approach to addressing biodiversity issues

RECOMMENDATION 3 - To highlight the underlying purpose of the proposed new approach to planning, add an Objective explicitly aimed at ensuring the Hunter has sufficient housing supply to meet demand and put downward pressure on housing affordability.

Objective 1: Diversify the Hunter's mining, energy and industrial capacity

UDIA agrees with this Objective but would encourage more emphasis on opportunities to repurpose mining assets to support urban settlement. We also note that the draft RP does not address the current constraints in the supply of construction resources including quarry materials. The Regional Plan should identify Hunter quarry assets important to supplying the Hunter and NSW with adequate construction materials.

RECOMMENDATION 4 - To ensure NSW is supported with an adequate supply of construction materials, the Hunter's quarry assets should be identified, and the Regional Plan should identify measures to ensure they are able to deliver.

Regarding repurposing mining assets, the draft RP identifies that the region has immense opportunity now to utilise the legacy that those former coal mines have created.

We need to look wholistically at how we best capture those opportunities, including the potential repurposing of legacy coal rail lines to support transport where they are close to residential areas. DPE should work with TfNSW to develop a plan for the use of these rail lines.

Looking beyond infrastructure, the former mining landholdings themselves present enormous prospects for the Lower Hunter. Already, some of these sites are approved or being considered for significant environmental conservation, recreation and tourism options and/or additional homes for our growing Hunter population. We believe more consideration should be given to their potential for urban uses including housing.

RECOMMENDATION 5 - The Regional Plan should consider potential future urban uses of mining assets and include an Action for DPE to work with TfNSW to consider the use of legacy coal rail lines to support the region's urban growth.

Objective 2: Ensure economic self-determination for Aboriginal communities

agrees with this Objective. Several Local Aboriginal Land Councils (LALC) are active UDIA members. We would welcome additional engagement with LALCs, perhaps facilitated by DPE, to help identify development opportunities to realise economic and environmental benefits for their communities.

Objective 3: Create a 15-minute region made up of mixed, multi-modal, inclusive and vibrant local communities

is wary of Objective 3. We question its achievability, and we believe it could inhibit the delivery of much needed housing supply in the short term.

The Objective applies several new considerations for a development proposal:

- Strategy 3.1 states that development proposals will need to demonstrate how various employment, commercial, community, recreation and education services will be located within 15-minute walking (urban contexts) and cycling (suburban contexts) trips of housing in residential and mixed-use zones, with achieved densities that allow for such local uses to succeed and flourish.
- Strategy 3.5 states that development proposals will need to be considered in the context of the 30-minute connected communities context, including considering a mix of uses, distances between uses, directness and the experience in moving between uses, with public transport having a service level that strategically supports the type of mobility shift and easy accessibility to needs that is contemplated in Objective 3.
- Strategy 3.8 states that development should enable direct connections for walking, cycling and public transport between precincts and into centres. Larger scale development should facilitate a network that provides seamless connectivity to transport network with multiple access points to walking, cycling, and public transport.

It is explained that the 15-minute concept will vary across different contexts. However, the draft merely offers a vision of how it might play out, saying that the "intent is to continue to develop the concept in partnership with community, councils and industry in order to create a 'fine grained' approach."

appreciates the intention to engage with industry on further concept development; however, the lack of current detail introduces significant uncertainty in the planning process.

We are highly concerned that Objective 3 will be difficult to meet and will set up development proposals for refusal. While the concept sounds attractive from a liveability perspective, the reality is that a 15-minute neighbourhood requires infrastructure that councils will have to deliver. It will also need community buy-in that councils will have to navigate.

We already know that councils cannot keep up with delivering local infrastructure, and we know that communities are reluctant to embrace higher density. How will these hurdles be overcome?

undertook research⁶ into the funds being held by councils from section 7.11 and 7.12 contributions across the Sydney Megaregion. At the end of FY20, the five councils of the lower Hunter were holding \$256 million, and across the Megaregion the total was \$3bn. At a time when we have a housing crisis and need to look beyond the pandemic and support the economic recovery, it is ridiculous that this money is not being used to support home building, create jobs or provide the local services our communities need. Most Councils do not spend their infrastructure contributions because they are waiting for almost all the contributions to be received, before building the infrastructure. In our Pre-Budget <u>submission</u> to the NSW Treasurer, has proposed the NSW Government creates a \$100m self-replenishing Council Enabling Infrastructure Fund to support councils in bringing forward enabling infrastructure with future infrastructure contributions used to replenish the fund. If this is established, it could assist in delivering local infrastructure in proactive council areas. Unfortunately, not all councils are willing to use available assets and pathways that would support development.

At the end of the day, it all depends on the council's willingness to support a new proposal, and the 15-minute neighbourhood metric could simply become another reason to say no to an otherwise good proposal.

RECOMMENDATION 6 – To avoid unintended consequences from uncertainty, replace Objective 3 with an Action to collaborate with community, councils and industry to develop the concept of a 15-minute neighbourhood and 30-minute community, with a proposal to be considered by the UDP Committee by the end of 2023.

Objective 4: Plan for "Nimble Neighbourhoods", diverse housing and sequenced development

■ supports the intent of Objective 4 – especially the focus on creating more diverse housing choices, increasing housing affordability, supporting the viability of public transport and reducing cardependency – once again, we are wary of its application and potential to inhibit much-needed housing supply, especially in the short term.

The draft RP proposes a dramatic change in density for the region, calling for 50-75 dwellings per hectare of developable land. This is in sharp contrast to current density levels of 10-15 dwellings per hectare in the Hunter's R1 and R2 zones. Proposals for development less than this range would require justification to show how the proposal would "still achieve the outcomes" listed, all of which are

⁶ UDIA 2021. Infrastructure Performance Monitor FY20

designed in circularity around the higher density benchmark. There are no steps outlined as to how to achieve the change.

Certainly, such high-density benchmarks cannot possibly be achieved in every context, nor would a community want them to be. While the draft RP acknowledges this, there is no detail to give guidance to councils, the community or development industry about where and how to achieve this density. One logical path would be to leave the detail to councils to spell out in their Local Environmental Plans (LEP) as guided by their Local Housing Strategy, but no clear direction is provided.

This lack of a change management plan creates an uneasiness in the development industry: without clarity on where the higher density is desired or how to achieve it, Objective 4 raises significant uncertainty. We believe that higher density is best achieved by responding to demand for housing where it is strongest, i.e., as signalled by the highest prices. It is no use building high density that does not meet the market demand and does not sell. Increasing density in some parts of the Hunter will be desirable, such as around public transport hubs and in existing centres. But pushing high density where the market clearly favours lower density greenfield living will undermine the vibrancy and appeal of the Hunter. This Objective must be careful to not create another reason to refuse consent for an otherwise good proposal that would meet demand for the housing typology stock the local market is seeking.

Strategy 4.4 does provide new development benchmarks for infill versus greenfield housing within each of the Districts. We note that these benchmarks are inconsistent with the adopted *Greater Newcastle Metropolitan Plan 2036* (GNMP). If the current draft RP is adopted, we will have two adopted plans that contradict one another and the GNMP is not scheduled to be reviewed for another year. For example, the draft RP talks about 50-75 dwellings per ha, while the GNMP talks about 15 dwellings per ha. In another example, the GNMP calls for 60/40 infill/greenfield targets, while the draft RP talks about 80/20 in the Greater Newcastle District, and the draft RP redefines the boundary of Greater Newcastle. This is confusing and adds more uncertainty to the planning process. The Regional Plan should clarify which Plan takes precedence and why.

is fully supportive of efforts to prioritise the provision of more diverse housing typologies and we are generally supportive of moving toward relatively higher density, particularly in the Greater Newcastle District. We simply note that high demand for housing in the Hunter is expected to continue along trends responding to the pandemic, with migration away from Sydney's higher density and costs to the Hunter for more affordable lifestyle and space. With borders reopening, demand for new housing overall will continue to grow. Demand in the Hunter for affordable lifestyle and additional space is already beyond our current capacity to supply, and the demand will not diminish. The Hunter must be able to respond to market demand and supply true housing diversity across all typologies at least at a relatively affordable price.

Such a significant movement toward higher density should be phased in through a series of Actions outlined in the Regional Plan. If the Strategies under this Objective were broken down to be Specific, Measurable, Accurate, Realistic and Time-Based (SMART), then as an example, a series of Actions might provide the following detail:

- Specific Increase the housing densities in new greenfield neighbourhoods to support public bus services by changing lot size maps in Local Environmental Plans.
- Measurable Residential densities will increase from the current average of 10 dwellings/ha
 to a minimum of 20 dwellings/ha on land zoned R1 General Residential and/or R2 Low
 Density Residential by the year 2041.

- Achievable Local Environmental Plans will be amended to remove the minimum lot size maps and introduce a maximum lot size map of 225sqm within two years, which then allows 17 years to achieve the quantitative goal of an increase in 10 dwellings/ha, which is an increase of 0.58 dwellings/ha per annum.
- Realistic This goal of 20 dwellings/ha on land zoned R1 General Residential and/or R2 –
 Low Density Residential would significantly change the character of new greenfield
 communities. This goal is significantly less than the 50-75 dwellings per hectare target that is
 outlined in the draft plan. A gentler and more realistic approach may be to gradually
 introduce quotas for small lots (for example, as included in Lake Macquarie, Clause 4.1B),
 which would give the market an opportunity to adapt and evolve.
- Time-Based Increase the average housing density of land zoned R1 General Residential and/or R2 Low Density Residential by 10 dwellings/ha by 2041. An annual monitoring report will be published by an independent consultant that demonstrates performance against the 0.58ha target.

would be pleased to work with DPE and councils to develop a series of Actions that could move the region toward the supply of a more diverse range of housing typologies and generally higher density.

RECOMMENDATION 7 – To more smoothly move the region toward the supply of a more diverse range of housing typologies and generally higher density, provide density targets for each growth area in the short, medium and long terms, and develop a series of measurable and achievable Actions in consultation with industry and councils.

Objective 5: Increase green infrastructure and quality public spaces and improve the natural environment

agrees with the statement on page 47 of the draft RP that strategic land use planning "should identify and take account of the location and extent of areas of high environmental value, including areas of potential serious and irreversible impact species, threatened species, biodiversity corridors and koala habitat." Doing this strategic work up front would provide certainty and better outcomes for the environment as well as development.

Unfortunately, to date the NSW Government has not invested in understanding the level of detail necessary to give certainty to the strategic land use planning process in this regard. For most of the Hunter's identified urban development areas, biodiversity assessment is on a site-by-site basis under the Biodiversity Conservation Act (BC Act), Koala SEPP and any local council policies.

We strongly support Action 2 that commits DPE to "continue to progress the Central Coast strategic conservation planning program and consider opportunities to undertake further strategic conservation planning in Morisset. Timeframe: 2022/23". However, we believe this Action should go further and state the DPE will "...consider opportunities to undertake further strategic conservation planning across the Hunter, including in Morisset."

commissioned a report⁷ last year by the ecology firm EMM to attempt to understand the quantum of biodiversity offset requirements across the residential and employment zoned land in the

⁷ EMM 2021. <u>Issues paper on the NSW Biodiversity Offsets Scheme</u>

Hunter and Central Coast, to then calculate the cost for meeting biodiversity offset requirements for the development of that land. EMM estimated a total ecosystem offset cost of \$2.1 billion across the ten LGAs in the Hunter region. The majority (65% or nearly \$1.4 billion) of that cost is for land zoned for residential development.

Delivering a healthy pipeline of development ready land requires biodiversity issues to be resolved in a way that protects and enhances the biodiversity of NSW. and EMM showed that the current biodiversity offset system is holding back the supply of homes and failing to deliver good biodiversity outcomes. Resolving biodiversity issues is becoming increasingly difficult as the Biodiversity Conservation Act 2016 (BC Act) is applied to more land. Much of the Hunter's housing supply delivered last year was approved under the previous biodiversity legislation and had minimal or no interaction with the BC Act. However, as those older projects are completed, the supply of new homes is under threat as new development proposals encounter significant problems in navigating the BC Act. Fundamentally, the BC Act in its current form is an obstacle to meeting the Megaregion's housing and jobs targets, due to relying on site-by-site assessment and like-for-like offsetting, and biodiversity is a major constraint to the development pipeline in the Hunter.

In our NSW Pre-Budget Submission, we have recommended several steps the NSW Government should take to address biodiversity constraints, including establishing a Biodiversity Offset Bank and investing in strategic conservation planning for the Hunter. Ultimately, the NSW Government must take a more strategic approach to deliver the Hunter's biodiversity, economic and social needs and is keen to work collaboratively with Government to achieve better outcomes.

We agree with Strategy 5.7 that biodiversity issues should be addressed early in the planning process and we are encouraged by the potential of the place strategy and Place Delivery Group process to assist in that regard. We recommend that the Regional Plan state positively that the issue of "avoidance" of areas of high biodiversity value, and addressing Serious and Irreversible Impacts, should be dealt with up front during the rezoning phase (whether a place strategy is utilised or not). Once addressed during rezoning, the question of "avoidance" must be turned off for development purposes and "avoid" should not be re-opened during the development assessment stage; rather, the only issue to be addressed during the assessment stage should be minimising and offsetting.

We agree with Strategy 5.9 that development proposals should aim to strengthen biodiversity corridors as places for priority biodiversity offsets. However, we note there is a lack of detailed mapping from DPE about where biodiversity corridors of high value exist. We are disappointed that the Hunter lacks the equivalent of a current detailed Regional Biodiversity Conservation Plan. We recommend that DPE invest in better biodiversity mapping to provide more certainty for land use planning and to encourage landowners in high value corridors to participate in the offset credit trading market. Again, we recommend applying the SMART process to outline a series of Actions to support this Objective.

RECOMMENDATION 8 - To provide certainty for development and biodiversity outcomes, make clear that the question of biodiversity "avoidance" should be addressed during rezoning and then the issue of avoidance should not be re-opened; the only biodiversity issue to be addressed during the assessment stage should be minimising and offsetting requirements.

RECOMMENDATION 9 - To support better strategic outcomes for biodiversity and development, amend Action 2 to state DPE will "...consider opportunities to undertake further strategic conservation planning across the Hunter, including in Morisset."

RECOMMENDATION 10 - To provide more certainty for land use planning and to encourage landowners in high value corridors to participate in the offset credit trading market, the Regional Plan should include an Action to deliver a Regional Biodiversity Conservation Plan in consultation with stakeholders including industry.

Objective 6: Reach net zero and increase resilience and sustainable infrastructure

The construction, operation and maintenance of buildings accounts for almost a quarter of greenhouse gas emissions in Australia.8 welcomes the NSW Government's commitment to Net Zero by 2050 and our members are undertaking significant steps to move towards that target. The draft RP "seeks to make climate change a guiding principle for all planning decisions" and suggests a number of ideas in line with the NSW Government's approach to move the industry towards Net Zero. While some of these ideas may be helpful, overall considers that the current approach by the NSW Government to move the industry towards Net Zero is currently poorly thought out and will reduce the supply of homes and worsen affordability.

Research⁹ undertaken by has shown that the NSW community is supportive of moving towards Net Zero in the development of new homes but is unwilling to pay a significant amount extra to achieve it. Given that NSW has some of the most expensive housing in the world this is unsurprising. If we are to achieve Net Zero, whilst avoiding reductions in the supply of new homes and increased housing costs to the homeowner, it is essential that the industry and NSW Government work together. believes that a jointly developed roadmap that looks at how we can move towards Net Zero without reducing the supply of homes or worsening affordability would encourage investment and jobs into NSW and act as an exemplar for the world. We have recommended this approach in our Pre-Budget Submission to the NSW Treasurer.

Again, we recommend applying the SMART process to outline a series of Actions to support this Objective.

Objective 7: Plan for businesses and services at the heart of healthy, prosperous and innovative communities

supports the draft RP's Objective to strengthen the role of centres and main streets. We agree that intensifying centres can make efficient use of existing infrastructure and support more public transportation, and these are the correct locations for higher density living.

We support Strategy 7.5 that seeks to deliver new early childhood education and care facilities.

Again, we recommend applying the SMART process to outline a series of Actions to support this Objective.

Objective 8: Build an inter-connected and globally focused Hunter

generally supports Objective 8 which aims to improve connectivity and promote the global focus of the Hunter. The creation of the GCC and the NSW Government's more strategic focus on the Sydney Megaregion including the Hunter should support this Objective.

⁸ From leaders to majority: a frontrunner paradox in built-environment climate governance experimentation

⁹ UDIA 2020. <u>Home Purchaser Sentiment Survey</u>

Related, we are concerned that the Hunter Expressway Strategy, still in draft form, does not appropriately balance the land use needs and opportunities around its corridor. Our submission¹⁰ to that draft strategy outlines our concerns which remain valid.

Again, we recommend applying the SMART process to outline a series of Actions to support this Objective.

FOCUS #2: PROVIDING TRANSPARENCY, CERTAINTY AND ACCOUNTABILITY IN THE PROCESS

strongly endorses the draft RP's recognition that NSW Government planning has failed to coordinate the provision of services and infrastructure needed to support the delivery of new growth areas and housing supply. As a result of this failure, plus challenges in addressing biodiversity, the Hunter is falling behind on housing supply and experiencing rapidly rising house prices. This must change if the Hunter is going to reach its potential as a vital part of the Megaregion.

We are supportive of an approach to delivering housing supply and growth areas that is focused on better cross-government coordination in collaboration with industry.

The draft RP proposes a new approach with a central role for the Hunter Urban Development Program (UDP) and the creation of a Place Delivery Group (PDG) that would develop place strategies for significant growth areas, working through site issues up front before rezoning occurs. This new approach endeavours to get an early agreement by public and private stakeholders on how to deliver an area and thereby achieve two important outcomes:

- a. the provision of infrastructure and services timed to support development; and
- b. streamlined rezoning and development approval processes.

fully and enthusiastically supports these goals.

We note that the draft RP has a large focus on infill developments over greenfield land release. However, the focus of 'making it happen' is about catalyst and enabling infrastructure being developed and procured during the strategic/rezoning stages. This approach may be more suited to greenfield rezoning areas, and it is unclear how the approach will apply practically to infill development. would like to work with DPE on how infill areas could be supported by this approach.

Overall, while we share the ambitions and believe the proposed approach has merit, the draft RP leaves too many important questions unanswered to give us confidence that it would be an improvement on the current planning process by reducing time, cost and uncertainty. In fact, the proposed approach has the potential to *add more* time, cost and uncertainty. Several fundamental issues must be satisfactorily addressed in consultation with the development industry before can endorse the direction of the draft *Hunter Regional Plan 2041*.

¹⁰ UDIA 2021. UDIA Response to the draft Hunter Expressway Strategy

Strengthening the Urban Development Program

has been a strong advocate for the creation and utilisation of a UDP Committee for many years. We were pleased and encouraged that the *Hunter Regional Plan 2036* established the first-ever UDP for the Hunter and has been an active participant in the Hunter UDP Committee's work. We believe the UDP Committee has great potential for cross-government coordination and collaboration with stakeholders to deliver housing and employment areas. Crucially, the Hunter UDP Committee actively seeks and is informed by industry input about the commercial realities of development, as well as the specific constraints to delivering sites. This industry input is critically important to a full understanding of what is possible to deliver.

Notwithstanding our strong support for the concept of the Hunter UDP Committee and the efforts of the Hunter and Central Coast Development Corporation (HCCDC) in advancing the UDP Committee, we have been disappointed with its outputs so far. Presently, the Hunter UDP Committee is a great idea that has established goodwill among its participants and collected a significant amount of intelligence regarding development sites, but it has neither authority nor accountability for any deliverable outcomes. Therefore, despite good baseline work locally, to date it has had little impact on housing and employment land delivery for the Hunter.

The draft RP proposes a bolder role for UDP that we support: as "the NSW Government's program for managing land and housing supply and assisting infrastructure coordination in the Hunter", the UDP "will ensure a pipeline of land is available from potential future growth areas to investigation areas and zoned and serviced land ready for new homes and jobs."

agrees this is the role of the UDP. If the settings and resourcing are appropriate, the UDP can be a game changer in delivering housing and employment land supply.

To make it work, several major shifts must occur. emphasises that these elements are "must-haves" for the UDP to be successful:

- 1. Transparency and Accountability
- 2. Authority
- 3. Resourcing

RECOMMENDATION 11 - To enable success under the new approach, the UDP must be strengthened through a set of specific actions that ensure it has transparency, accountability, authority and adequate resourcing.

UDP Transparency and Accountability

commends the draft RP for committing to better reporting for the UDP.

State and local government, utilities, industry and the community all need access to clear information to enable good decisions. is disappointed that the Hunter UDP has only published one report since its first meeting three and a half years ago, despite agreement on the importance of frequent public reporting. The lack of transparency from, and measurements of, the UDP Committee make it impossible to judge the realistic potential of the *draft Hunter Regional Plan 2041* now on exhibition. Future delivery efforts will fail unless transparency and reporting improve.

Further, whilst the UDP has played a role in unlocking some state Special Infrastructure Contributions in the Hunter, this money has overwhelmingly been allocated to TfNSW who have failed to deliver any results to date.

We are pleased to read the draft RP state that the UDP "will publicly report data on approvals and completions, and audit greenfield and infill areas." We welcome the draft RP's commitment that two reports will be delivered annually:

- 1. Annual Report on the implementation of the Regional Plan; and
- 2. Sequencing and Delivery Report including
 - o Evaluation of investigation areas against a "multi-criteria analysis" (undefined)
 - o Hunter-wide sequencing priorities covering all place strategies
 - o Roles and responsibilities for place strategies
 - o Resourcing, collaboration and funding agreements

These are essential deliverables for DPE and must be adequately prioritised and resourced.

To support informed decisions, recommends additional reporting and use of technology.

DPE have created development data dashboards for the Greater Sydney and Illawarra Shoalhaven UDPs. This effort should be expanded to include the Hunter and Central Coast by the end of 2022. The dashboard should show the full development pipeline for residential, business and industrial purposes, reporting on the following categories:

- a. Completed
- b. Under Construction
- c. DA Approved
- d. Zoned and serviced with biodiversity arrangements in place
- e. Zoned, but not approved
- f. Gateway Determination
- g. Identified in a Land-Use Strategy
- h. Land for Future Investigation

In reporting on approvals and completions, the dwelling density should also be reported.

There are limitations to the Greater Sydney and Illawarra Shoalhaven dashboards that should be improved upon, including for the Hunter and Central Coast. Some information is updated only annually, and we encourage DPE to provide quarterly updates on all data via the dashboard. We also note the current dashboards do capture density in terms of typology, but do not capture status of infrastructure provision, biodiversity arrangements, or any pre-gateway sites.

In addition to providing a comprehensive data dashboard, the UDP should be presented through a digital spatial mapping tool that shows the development sites and the infrastructure needed to support them. Such tools can identify where infrastructure investments will have the greatest impact. Making these improvements and having this "one source of truth" will allow all stakeholders to make better decisions together.

RECOMMENDATION 12 - To provide transparency and support accountability, in addition to publishing the Annual Report and Sequencing and Delivery Report every year, the UDP should be enabled with digital mapping technology to show where infrastructure and development can and are being delivered; and DPE should create a live and interactive Hunter UDP Dashboard by the end of 2022 (modelled on the Greater Sydney UDP Dashboard) with data updated at least quarterly.

The UDP must be accountable to a set of measurable metrics. The draft RP indicates that the UDP will oversee a pipeline of housing and employment land supply, and DPE staff have stated that the UDP will be the 'custodian' of the development pipeline. UDIA supports this responsibility.

However, how will success be measured for this responsibility? The draft RP proposes UDP benchmarks to measure the "10-15 years of land capacity required at any one time", being 0-5 years of zoned and fully serviced land; 6-10 years of zoned and part serviced; and 10-15 years of future investigation land.

is strongly supportive of thinking about the pipeline not just in terms of zoned land, but also in terms of its viability to supply the market, i.e., measuring the supply of *development ready land*: including servicing/infrastructure provision is a good start to a much more realistic way of considering the supply pipeline, and the definition should also include the status of biodiversity arrangements.

However, the draft RP does not provide any supply projection/target numbers with which to employ the pipeline benchmarks. How big should the pipeline be? How will DPE measure the land capacity "required at any one time"? We believe that a contingency buffer should be built into the pipeline to allow market levers to operate efficiently and add to supply in times of high demand. This is needed for both residential and employment land.

research partner Research4 has shown that to keep prices affordable, a housing market must have double the capacity of development ready land, compared to current demand. This capacity contingency allows developers to quickly meet demand with development ready supply, keeping prices stable. The lag time in developing new housing supply means that, unless the housing market is primed now with strategies to support supply that can quickly match a change in demand, we will see increasingly chronic affordability issues in the Hunter. As we have witnessed locally in the past two years, prices will rise sharply in times of high demand without this contingency supply buffer.

Likewise for employment land, a buffer must be built into projections to capitalise on employment growth opportunities. There is high demand for employment land right now in the Hunter. We do not agree with the Employment Lands Monitor that the pipeline for employment land is adequate. Those analyses rely on an average take-up rate between 2010 and 2019, before the completion of NorthConnex and before the higher demand we are currently experiencing. Looking back offers some insight, but forward planning must include a contingency supply buffer to account for new growth in demand, to combat housing affordability pressures.

To apply the concept of development ready land more effectively, the following actions should be taken:

- i. Add biodiversity approval, which is equally important to infrastructure/servicing in terms of being able to deliver development ready land. The 0-5 year benchmark should be stated as "zoned & fully serviced with biodiversity arrangements in place".
- ii. The Regional Plan should provide the 15-year housing target/projection.
 - a. This should be expressed as number of dwellings.
 - b. The target/projection should include a supply contingency of 100% to keep housing affordable in response to market conditions.
 - c. The UDP should monitor and report density levels for approvals and completions by area, giving the UDP the necessary data with which to recommend adjustments.
- iii. The Regional Plan should provide the 15-year employment land target.
 - a. This should be expressed in hectares.

b. The target should include a supply contingency of 100% to enable capitalisation of employment generating opportunities as soon as they arise.

The UDP should therefore be held accountable for maintaining the land capacity benchmarks against the stated supply targets for development, with a scorecard published annually. We recommend that the UDP should report to the Minister for Planning and Homes, and the Minister for Cities, on its annual progress and publish its recommended infrastructure investments and other measures necessary to maintain adequate supply.

RECOMMENDATION 13 - To more accurately reflect the idea of "development ready land", define the 0-5 Year pipeline of development ready land as "zoned and fully serviced with biodiversity arrangements in place".

RECOMMENDATION 14 - To keep the UDP accountable, provide 15-year targets/projections for number of dwellings (housing supply) and hectares of employment land, including a 100% contingency on housing supply to maintain housing affordability. The UDP should publish an annual scorecard of land capacity benchmarks against the supply targets, and report to Ministers on annual progress with published recommendations for infrastructure investments and other measures necessary to maintain adequate supply.

UDP Authority

The draft RP states the UDP will "ensure a pipeline of land is available". UDIA fully supports this objective, but we are concerned to note the draft RP lacks specificity about how this will be achieved.

Last year, undertook major research with our members to identify specific enabling infrastructure in the Hunter¹¹ that was currently a roadblock to supply and could be delivered to refill the development ready land supply pipeline. Our Building Blocks report identified infrastructure in the lower Hunter that, if all were delivered, could fill the lower Hunter pipeline with 41,000 residential lots and 590 hectares of employment land. The necessary infrastructure would cost \$522m with nearly half of the total being required for state roads. The lack of adequate funding for enabling infrastructure in the Hunter from TfNSW remains a crucial constraint on the region's housing and employment land pipelines.

Historically, even when funding is available, the attempt to integrate infrastructure and the supply of homes in the Hunter and across NSW has a long history with few successes and many failures. Successes have been achieved when both the political and departmental parts of the government had a can-do attitude that removed barriers such as bureaucratic processes that were getting in the way of delivery without adding significant value. Unfortunately, the current range of excuses on why infrastructure cannot be delivered in a timely way is long. Having discussed the problem with those who have been involved with successes, has recommended to the NSW Government that it appoints a cross-departmental team tasked with coordinating infrastructure and the supply of new homes assisted by a team of external advisors with the experience of making this coordination work.

The UDP should be considered integral to making this coordination work. With proper resourcing, the UDP will provide the valuable data and specific information needed to make collaborative decisions to manage the local supply pipeline. The UDP's recommendations for infrastructure funding and other measures should have meaningful weight in Government's prioritisation and funding governance processes. This should include, once the infrastructure contributions reforms have been implemented

¹¹ <u>UDIA Building Blocks: A Practical Approach to Infrastructure and Land Supply – Hunter Region, July 2021</u>

and Regional Infrastructure Contributions (RIC) are collected, the NSW Government should allow the regional UDP to allocate those RIC funds that are collected in its region.

RECOMMENDATION 15 - To support better coordination of infrastructure with the supply of new homes, the NSW Government should give meaningful weight to the UDP's recommendations and integrate them into funding governance and policy processes, including possibly giving the Hunter's Regional Infrastructure Contributions to the Hunter UDP to allocate.

UDP Resourcing

The draft RP articulates an ambitious and significant role for the UDP which supports. Overall, the draft RP envisions that DPE will be responsible for myriad substantial — and in notable cases, sizeable new — tasks related to the UDP and the new approach to planning including:

- chairing the UDP
- monitoring
- reporting
- developing an infrastructure assessment framework
- applying the multi-criteria analysis to establish place strategy sequencing
- chairing Place Delivery Groups (PDG) to lead or support the preparation of place strategies for growth areas
- endorsing place strategies

We have also recommended specific enhanced monitoring and reporting that must be delivered to enable transparency and accountability and support good decision making.

We are concerned that without proper additional resourcing at DPE, the ambitions outlined in the draft RP will be unachievable. In the first three years of the Hunter UDP's existence, DPIE produced only one Annual Report and no substantial progress was made toward unlocking the current pipeline's 41,000 Hunter homes¹² constrained by enabling infrastructure. Unfortunately, this track record gives us little faith that DPE and the UDP will be able to keep pace with the Hunter's accelerating demand for housing and employment land.

As envisioned in the draft RP, the Regional Plan's success rests squarely with DPE. This will require a step-change increase in resourcing for the Hunter-Central Coast team, supported by priority focus from the Department's overall functions.

RECOMMENDATION 16 — To support the substantial increase in responsibilities needed to successfully deliver the Hunter Regional Plan, DPE must re-prioritise resourcing especially for the expanded duties related to the UDP and Place Strategy Group.

Ensuring Success for an Infrastructure First and Place-Based Framework

The draft RP outlines a new approach to planning for growth that relies on an infrastructure first and place-based framework. welcomes and supports the thinking behind this approach. We are encouraged by the direction proposed in the draft RP. However, we have concerns with the lack of

¹² <u>UDIA Building Blocks: A Practical Approach to Infrastructure and Land Supply – Hunter Region, July 2021</u>

detail on how the process will work. We would like to work with DPE to resolve these issues to see the successful implementation of the approach.

RECOMMENDATION 17 - To avoid unintended consequences and ensure the process under the 'infrastructure first, place-based framework' is successful in maintaining a healthy pipeline of development ready land without increasing time, cost or uncertainty, fundamental issues such as sequencing criteria, escalation pathways, etc., must be addressed in consultation with stakeholders including industry before the Regional Plan is finalised.

The new approach relies on councils' local strategic planning statements (LSPS) and other local strategies to identify growth areas. A list of Regionally Significant Growth Areas and Planning Priorities is provided in the document.

Those growth areas would undergo an infrastructure assessment and then a multi-criteria analysis to establish the sequencing of undertaking place strategies. Our comments on this process are listed below, organised under each sub-section as laid out in the draft RP.

As an overall comment, seeks better transparency to understand how the Regionally Significant Growth Areas and District Planning Priorities have been determined by DPE. We note with curiosity that there are two Regionally Significant Growth Areas identified in Mid-Coast (Forester-Tuncurry and Taree), but nothing for Maitland, Port Stephens, or Cessnock. This seems odd considering their well-known comparative growth activity. Against what criteria have these areas been assessed to arrive at the list?

RECOMMENDATION 18 - To provide transparency and set expectations for future decision making, provide a clear explanation of the criteria and process for choosing the Regionally Significant Growth Areas and District Planning Priorities.

1. Plan for growth areas in the right ways through local strategies

This section states that councils' local strategies will identify where future urban development should occur, and that DPE will use existing strategies (even if not finalised or endorsed) to work with council to transition the growth areas to the delivery framework.

Given that important details are not provided within the draft RP on a number of fronts – including local population, dwelling, density and jobs projections – it is assumed that these matters will be decided by individual councils and expressed in their local strategies. There are no actions or timing for this to occur. How will councils be held accountable to deliver this information?

We note that housing strategies that have been developed by councils in response to the *Greater Newcastle Metropolitan Plan 2036* (GNMP) have not been endorsed by DPE. Is this due to a lack of confidence in what they have delivered?

As outlined above, believes that projections for population, dwelling, density and jobs should be provided by the NSW Government and detailed in the Regional Plan to help guide councils and give industry more certainty and confidence to invest.

While we agree that better strategic planning can provide more certainty and streamline the planning process, we are quite concerned by the uncertainty DPE, and the NSW Government is presently

creating. It is very difficult to make sound investment decisions when so many planning policies and strategies are changing. On top of the long list of state-wide planning reforms underway, in the Hunter there are a series of inconsistent strategic plans to navigate including:

- Regional Plan 2041 to be delivered in 2022
- Greater Newcastle Metropolitan Plan 2036, with an update in 2023
- LSPS and Local Housing Strategy (outdated by the RP)
- LEP and DCP (outdated by the RP)
- Possible new overarching Greater Cities Plan to be delivered by GCC in 2024

The Regional Plan should provide the clear strategic direction that councils need to guide their local planning, and that industry needs to guide investment decisions.

We refer again to our **Recommendation #1** - To provide industry with confidence to invest and to guide councils, the Regional Plan should include population, dwelling, density and jobs projections; and Actions to direct councils on what is required in their local strategies to be consistent with the Regional Plan, when this must occur and how councils will be held accountable.

2. Determine enabling infrastructure servicing and staging

This section states that an infrastructure assessment framework will be applied to investigation areas, considering the ability of each place to be supported by existing or new infrastructure, and determining the cost effectiveness of accommodating growth.

We note that an early iteration of an infrastructure assessment framework was developed for the UDP last year and applied to the Cessnock LGA as a pilot. UDIA was grateful to have visibility around that project. We shared our concerns about the pilot's limitations at the time, and DPE told us they are working on an improved framework and would be seeking our input. We have yet to see the proposed changes to the infrastructure assessment framework.

emphasises that the framework must be developed in collaboration with the UDP Committee stakeholders including industry. We recommend the establishment of a formal subcommittee of the UDP Committee to finalise the infrastructure assessment framework; industry generally, and UDIA specifically, should be part of that subcommittee.

RECOMMENDATION 19 - To provide transparency and ensure all data inputs are accurately captured, establish a formal subcommittee of the UDP Committee to finalise the infrastructure assessment framework, to include and other industry committee members.

3. Establish sequence for prioritisation of place strategies

In concept, we support a multi-criteria approach to determine sequencing for developing place strategies. As suggested in the draft RP, the approach will consider not only the cost effectiveness of infrastructure servicing, but also the public benefit of providing additional homes and catalytic opportunities around regional infrastructure investments. However, we are concerned with the low level of detail provided about the multi-criteria approach. The "public benefits" consideration is written as including "number of additional homes, proportion of build to rent, social or affordable housing, delivery of public open spaces, green infrastructure, environmental benefits and quality design", yet these are not well defined, it is unknown how or against what measure these will be

evaluated, and it is unclear whether this is the complete list. More detail is needed for a transparent evaluation process.

We commend the commitment to publish an annual place strategy sequencing and delivery report that includes an evaluation of investigation areas against the criteria; Hunter-wide sequencing priorities covering all place strategies; roles and responsibilities for place strategies; and resourcing, collaboration and funding agreements. This information will be critical for transparency and accountability.

RECOMMENDATION 20 - To ensure a transparent place strategy evaluation process and provide more certainty for investment, the Regional Plan should provide more detail on the full and measurable criteria against which the UDP will determine place strategy sequencing.

4. <u>Develop place strategies to align development and infrastructure</u>

This section explains how place strategies will be developed. We have read this section in conjunction with *Appendix C: Infrastructure first and place-based delivery* and offer our consolidated comments here.

While is cautiously encouraged by the thinking behind the place strategy approach, we have a series of fundamental questions that must be addressed before we can offer our support.

We emphasise our **Recommendation 17** which calls for addressing these issues in consultation with stakeholders including industry before the Regional Plan is finalised. Doing so will help to avoid unintended consequences and ensure the infrastructure first and place-based process – including the Place Delivery Group process – is successful in reducing time, cost and uncertainty.

Below we summarise the issues we have identified around the Place Delivery Group and place strategy process, with questions to be answered and recommendations.

Issue: Better, Worse or More of the Same?

Questions:

• What benefit will be derived from adding this new place strategy layer to the planning process?

The NSW planning system is already the lengthiest, most complex and costly in the country. We appreciate that the PDG/place strategy approach is aimed at reducing overall timeframes and costs.

We see potential benefit from the draft RP's statement that the PDG will "determine technical investigation requirements for the place strategy and remove subsequent public authority concurrences and referrals at rezoning", and that the place strategies will seek to result in upfront approvals, with planning proposals and DAs being able to be assessed concurrently.

If this process is to truly result in an improvement on the current system, then it must reliably remove the duplication of effort and cumulative additive costs that the current system imposes. Given the challenging history of the NSW planning system, there are no guarantees here that give us confidence in the ability of the new approach to either reduce time and cost or ensure the appropriate infrastructure is delivered in line with development needs. DPE is asking the development industry to

agree to earlier large investments of time and money and take a leap of faith that the process will deliver. The proposed approach could easily result in less certainty versus the existing Gateway process.

We need a more detailed understanding of the process before we can contemplate taking the leap.

To avoid unintended consequences and provide certainty for investment, DPE should produce a defined standard template for the PDG place strategy process so that key project management variables of responsibilities, timing and resourcing will be clear to all parties. This should include a list of all possible studies required, when they are required, the level of detail to be contained within the study and who can prepare them. Be prescriptive and do not use the terminology 'may be' or 'likely to be required' as is proposed in the LEP Plan Making Guidelines. The process should be explicit that plans, studies and reports utilised in the place strategy process are not re-prosecuted, devalued or required to be revised at rezoning or DA stage and that the biodiversity "avoid" question is explicitly turned off after it is answered the first time.

RECOMMENDATION 21 - To avoid unintended consequences and provide certainty for investment, DPE should produce a defined standard template for the PDG place strategy process. The process should be explicit that plans, studies and reports utilised in the place strategy process are not reprosecuted, devalued or require to be revised at rezoning or DA stage and that the biodiversity "avoid" question is explicitly turned off after it is answered the first time.

Issue: Time

Questions:

- How long will it take to develop a place strategy and infrastructure delivery plan?
- Who is accountable for keeping the process on track, and how will that accountability be achieved?
- What is the escalation pathway to keep the process on track?

We support the outputs of the PDG being: delivery of place strategy + delivery infrastructure delivery plan.

We appreciate that the PDG inception meeting will prepare a program and milestones to deliver the place strategy. We emphasise our comments above that a template should be developed and employed consistently that spells out timing, responsibilities, resourcing and what technical studies will be required.

The place strategy process must include mechanisms to proceed if an agency fails to respond within an appropriate timeframe. There should be clear statutory timeframes for agency responses. This is essential to ensure the place strategy process genuinely contributes to an improved timeframe for the overall planning process. If comments are not received within a reasonable timeframe, the place strategy should proceed, and the agency would have no ability to comment further during rezoning or assessment.

The draft RP states that the PDG process could be escalated to the PDU if necessary, but the escalation pathway is not well defined. Along with statutory response timeframes, the triggers for escalation

should be spelled out and should include automatic escalation if an agency fails to meet the statutory timeframe for response.

RECOMMENDATION 22 - To ensure the PDG and place strategy process improves on the overall time and costs of the existing planning system, the Regional Plan must include statutory timeframes for agency responses and delivery of milestones, and a clear escalation pathway to the PDU with defined triggers to ensure the process stays on track.

Issue: Costs

Questions:

- What funding is available to deliver these place strategies?
- As an example benchmark, how much has Government spent on the Williamtown Special Activation Precinct?
- How will the PDG cost requirement be determined?
- In the case of multiple landowners, how will the PDG costs be determined and enforced, and how will the costs of studies be shared?

Based on member reports of recent experiences with new growth areas, estimates that circa \$1 million would be required to prepare a reliable place strategy that identifies water/sewer needs, biodiversity assessments, traffic assessments and urban design for a new development of around 2,000 dwellings.

This media <u>article</u> reports that the NSW Government has committed more than \$1 billion to deliver five SAPs, which roughly equates to \$200 million per SAP. Would such resources be available to support place strategies development?

RECOMMENDATION 23 - To provide transparency and accountability, develop an indicative cost template for delivering a place strategy that outlines which party would be responsible for which elements and where funding will be sourced.

The place strategy process is required where there are more than two landowners. Noting the draft RP's objective of "supporting the role of small and medium-sized developers in providing new homes", these are often areas where such developers are active. These fragmented growth areas often stagnate because there is no lead developer or landowner who can or is willing to bear the upfront capital costs of technical studies and/or infrastructure delivery. These areas would benefit greatly from a place strategy process, yet they are the sites that are least able to fund it.

The draft RP implies the cost negotiation will be left to councils to work out with landowners. The idea of forward-funding from councils is floated.

recommends that DPE should chair the PDG for fragmented land ownership areas and council forward-funding of the place strategy process should be encouraged. The council investment could be recouped via infrastructure contributions from future development.

RECOMMENDATION 24 - To support delivery of areas with fragmented ownership, DPE should chair the PDG, and council forward-funding of the place strategy process should be encouraged.

Issue: Accountability and Escalation

Questions:

 How will the PDG ensure the process meets milestones, including in cases where stakeholders (including DPE itself) fail to provide timely inputs or fail to engage in the process with a solutions-focused mindset?

The draft RP envisions that the PDG could escalate issues to the Place Delivery Unit (PDU) at DPE. UDIA supports escalation to the PDU to assist in resolving issues. However, the draft RP's trigger of "where there are risks of not meeting objectives of the RP" is too subjective.

RECOMMENDATION 25 - To provide certainty and keep the place strategy process on track, clearly define the guidelines for escalation to the PDU and beyond to the Secretary and Minister, in the context of meeting specific time and input milestones.

Issue: Removal of Gateway

Questions:

- How will "consistent with the place strategy" be defined and enforced for purposes of removing Gateway requirements?
- Will an appeal pathway be available?
- Will endorsement of the place strategy have a defined period of validity?

supports the draft RP's vision that where a place strategy has been endorsed by DPE, subsequent Gateway determination requirements will thereby be removed for rezonings. The draft states that the planning proposals must be "consistent with the endorsed place strategy" to enable this pathway.

While this sounds reasonable, we are concerned that if the question of consistency is left to the PPA, usually the local council, there will be less certainty than the Gateway process currently provides. This could introduce additional risk after the proponents have made significant early and upfront investments in the delivery of a place strategy.

If the new approach is to provide real benefit, it should pass the following test: any earlier investment in time and cost should be offset by a higher level of certainty and reduced time and costs in the end-to-end planning process.

Two assurances could be provided: provide a pathway to appeal a determination of "inconsistent"; and guarantee that issues addressed in the place strategy process – including biodiversity avoidance and technical studies – will not be prosecuted again.

RECOMMENDATION 26 - To provide certainty and ensure the process is an improvement on the current system, the place strategies must be very clear in what will satisfy the question of "consistent with" for the purposes of rezoning, and an appeal pathway should be provided. The place strategy endorsement should apply for planning proposals lodged within a defined period of

years, e.g., five years, and biodiversity avoidance and additional technical studies and concurrence and referrals should not be required for a planning proposal during that timeframe.

Issue: Proponent involvement in developing place strategies

Questions

- How will the PDG and place strategy process consult with industry?
- Will DPE chair the PDG for "large growth areas" that are required to develop a place strategy?
- Is elevation to the PDU an option for "out of sequence" PDGs?

According to the sequencing recommended by the UDP, DPE will chair a PDG to develop place strategies for Regionally Significant Growth Areas from the Regional Plan, and Catalyst Areas from the Greater Newcastle Metropolitan Plan.

UDIA emphasises that proponents and landowners in these areas must be an integral part of the PDG process, where they will provide the necessary commercial reality check for the PDG, and help identify potential cost-saving synergies, for example in the case of technical studies. This is especially important where the proponents will be asked to fund any aspect of the technical studies and therefore should have transparency to and be fully involved in the PDG's work. To avoid any confusion, the role of proponents must be clearly defined.

RECOMMENDATION 27 - Taking into account appropriate probity requirements, proponents and landowners should have a direct seat on the relevant PDG and full transparency should be afforded to them. The role of proponents in developing place strategies should be clearly defined.

PDG place strategies are required for large growth areas with 2,000 or more dwellings, more than 200ha employment areas, or sites held by more than two landowners or across LGA boundaries, and these must be funded by the proponent(s).

DPE held a development industry workshop on the draft Hunter and draft Central Coast Regional plans on 16 February and stated that while the above sites will be required to produce a place strategy and would have access to the PDG, DPE resourcing would "not be available". We assume this is in reference to direct funding, but seek clarification that DPE would still chair the PDG in these instances.

This section raises alarms for our members about the approval process for such sites. The draft RP requires this additional place strategy process and states it must be fully funded by the proponents. Yet DPE has stated they cannot apply resources to the process. The draft RP therefore has added a significant additional lengthy and costly step to the rezoning process, but provided no extra certainty of an outcome.

RECOMMENDATION 28 - To ensure fairness, the PDG place strategy process should be an option, not a requirement, for proponent-led growth areas. DPE should chair all PDGs for all sites, and the escalation pathway should apply for every area undergoing a PDG place strategy and infrastructure delivery plan process.

Issue: Unlocking currently zoned and constrained sites

Questions:

- How will the UDP apply the infrastructure first and place-based framework to unclog the current development pipeline?
- What is the change management plan, especially for projects in the current pipeline?

The draft RP states that a place strategy is recommended for zoned sites where it could help to resolve infrastructure requirements prior to development application for subdivision. DPE staff have said that in such cases, the proponent would fund the PDG process.

Given the UDP is the custodian of the development pipeline, and many legacy sites are clogging that pipeline in large part because the NSW Government has failed to plan and deliver enabling infrastructure, it is reasonable to expect DPE to provide resourcing to unlock these areas.

RECOMMENDATION 29 - To support adequate supply of housing and employment land, the UDP should endeavour to unclog the development pipeline by preparing a change management plan for projects in the current pipeline. Zoned but constrained sites should be offered the Place Delivery Group process, and DPE should partly fund the development of the place strategy and infrastructure delivery plan for these sites.

FOCUS # 3: DISTRICT PLANNING AND GROWTH AREAS

In general, supports the move to district planning and the identified Districts for the Hunter are mostly logical with some exceptions. members will make their individual submissions to DPE about the benefits their specific projects can bring to a District and region, and it is not place to promote one development over another.

We do have concerns and questions in this section related to transparency, consistency and accountability which are outlined below.

Regionally Significant Growth Areas and District Planning Priorities

Further to our comment under Focus #2, calls for greater transparency to understand how the Regionally Significant Growth Areas and District Planning Priorities have been chosen for each District. We are concerned that some significant residential growth areas that the Hunter UDP has previously identified for priority support have not been identified or included on the short list. The draft RP does identify some "priority locations for future housing", however the list does not correspond to the UDP Committee's work to date and is missing significant residential investigation areas. The RP should be clear about the planning status of the lists it includes and offer a clear explanation about how the areas were chosen. This concern is also reflected in our comments above, related to the UDP and Place Delivery Group process.

We reiterate **Recommendation 18** calling for a clear explanation of the criteria and process for choosing the Regionally Significant Growth Areas and District Planning Priorities.

Local Planning

The draft RP states that "Councils will reflect the planning priorities in local strategic planning." However, there are no actions or timeframes to hold councils accountable to this aspiration.

As detailed under Focus Area #2 above, we are concerned that the draft RP fails to provide enough certainty to give confidence for investment.

We reiterate **Recommendation 1**, calling for the Regional Plan to articulate projections and targets and include Actions to direct councils on what is required in their local strategies to be consistent with the Regional Plan, when this must occur and how councils will be held accountable.

Greater Newcastle Metropolitan Plan 2036

We are concerned by the inconsistencies between the *Greater Newcastle Metropolitan Plan 2036* and the Greater Newcastle District as proposed in the draft RP. Both the GNMP and the final Regional Plan will be endorsed strategies produced by the same government department, yet there are conflicts between them. The GNMP is due for review in 2023. How will these inconsistencies be handled in the interim?

would like to see better synergies between the two plans where possible, and where a change is made, an explanation for the change and clarity on the strategic planning hierarchy.

Some examples of where the two adopted Plans depart from each other are:

- a. The draft RP states that proposals will reflect a density ratio of 50-75 dwellings per hectare, whereas the GNMP calls for a minimum residential density of 15 dwellings per hectare in URAs. While not technically inconsistent, this is a drastic change in direction.
- b. The draft RP does not contain dwelling targets for each of the LGAs, but GNMP identifies specific dwelling targets. Will the GNMP targets remain? If not, what are the new targets under the RP?
- c. The draft RP specifies infill and greenfield ratio targets for the different Districts, which differ from the standard 40% greenfield and 60% infill targets in the GNMP.
- d. The draft RP maps districts such as the 'Greater Newcastle District', which differs from the boundary of the 'Metro Frame' within the GNMP (see below).



Illustration of boundary inconsistency between draft RP and GNMP

The draft RP states that the Department will continue to work with stakeholders to implement the GNMP, but it is not clear how this would be possible when there are inconsistencies between the two planning strategies.

RECOMMENDATION 30 - To provide better certainty and avoid confusion, DPE should undertake a detailed cross-reference between the actions and priorities contained within the *Greater Newcastle Metropolitan Plan 2036* and the draft Regional Plan to ensure that there are not any actions that contradict one another. Provide better synergies between the two Plans where possible now, and where a change is made, provide an explanation for the change and clarity on how any inconsistencies will be managed.

Gateway Determination Commitment

Under the Central Lakes District, the draft RP includes a box titled 'Gateway determination commitment' that states that "planning proposals in precincts that satisfy the following criteria will be given an accelerated assessment, with an intention for a gateway determination to be issued by the department in 5 working days for land" that satisfies a list of very clear criteria. We commend DPE for providing this commitment and we seek a clarification as to whether this commitment for Gateway determination applies only in the Central Lakes District, or throughout the Hunter and Central Coast regions?

RECOMMENDATION 31 - To provide more certainty about the planning pathway, clarify where the 'commitment for Gateway determination' applies within the region.

Mapping Inconsistencies

The draft RP must provide consistency in identifying future residential land to their lot boundaries.

The draft RP clearly maps 'proposed urban release areas' in the Mid-Coast LGA to their lot boundaries, but then variously identifies broad localities in other Districts as 'proposed residential' or 'proposed general residential' (e.g., HEX Corridor), 'priority locations for future housing' (e.g., Medowie), 'investigation area' (e.g., Morisset), 'residential precinct (subject to investigation)' (Lake Munmorah), with varying levels of mapped detail.

The locations identified in the Mid-Coast LGA reflect the Mid-Coast Urban Release Areas Report that was adopted by Council in August 2021. At the same time, other councils have multiple Local Strategies that have also been adopted by the council (e.g., Medowie Strategy) that identify future residential to the lot boundaries.

Many of these (e.g, Mid-Coast Urban Release Areas Report and Medowie Strategy) have not yet been endorsed by DPE. The variation in detail represents an inconsistency about how residential land has been identified across LGAs and is concerned this promotes uncertainty for industry and the community and undermines accountability for the UDP.

Consistency could be achieved by placing mapped land in each District into these categories (i.e., most of the categories to be captured by a UDP dashboard):

- a. Under Construction
- b. DA Approved

- c. Zoned, but not approved
- d. Gateway Determination
- e. Identified in a Land-Use Strategy
- f. Land for Future Investigation

RECOMMENDATION 32 - Increase certainty by applying a consistent approach to mapping; identify land by their planning status and identify future residential land to their lot boundaries where this land has been identified in a council-endorsed land use plan.

CONCLUSION

appreciates this opportunity to offer our comments and recommendations to the *draft Hunter Regional Plan 2041*. We appreciate the innovative thinking DPE is bringing to how to plan for the region's growth. We are enthusiastically supportive of finding better processes to align infrastructure planning with development, resolve biodiversity issues early in the planning process, and streamline rezoning and development assessment.

However, while we share these ambitions and believe the proposed approach has merit, we believe the draft RP leaves too many important questions unanswered and we are not confident that, as drafted, it will deliver the necessary housing and employment land to support the Hunter's growth through 2041. It is our view that the draft RP could introduce more uncertainty in the planning process, given its lack of direction on:

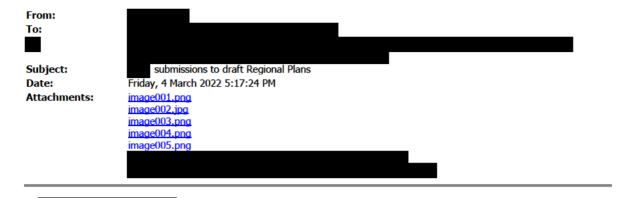
- population, dwelling and jobs projections;
- density targets for the region's individual growth areas;
- how to achieve a 15-minute neighbourhood; and
- how the Place Delivery Group and place strategy process will work.

is encouraged by the process proposed in the draft RP and would like to work with DPE and councils to agree on the details and how the process can include better transparency and accountability. We call on DPE to address the fundamental issues outlined in our submission in collaboration with industry before the Regional Plan is finalised.

sees enormous potential in the Hunter. We look forward to working closely with DPE and the NSW Government to provide for its future jobs and housing, offering choices in response to market demand for affordable lifestyle living.

Should you have any questions or wish to arrange a meeting for further discussion, please contact





is pleased to offer our comments to the **draft Hunter Regional Plan 2041** and the **draft Central Coast Regional Plan 2041**.

Please see both submissions attached.

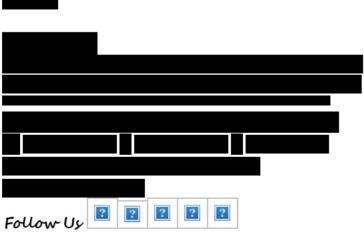
I was able to upload the Hunter document to the online engagement portal, but the Central Coast document did not attach.

You will see that our comments are very similar – in many cases, identical – given the substantial overlap in the draft Plans.

Overall, we are very encouraged by the direction. However, feels there are number of issues still to be worked through in both before we would be confident in their ability to deliver. Our Hunter Committee and Central Coast Committee each look forward to working closely with you on those issues as the final Plans come together.

Have a great weekend!

Kind regards,



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03 March 2022

Department of Planning and Environment Submission via NSW Planning Portal

Dear Sir/ Madam,

SUBMISSION TO DRAFT HUNTER REGIONAL PLAN 2041 –

1. INTRODUCTION

Thank you for the opportunity to provide a response to the Draft Hunter Regional Plan 2041 that has been placed on public exhibition by the Department of Planning and Environment (the Department) until 04 March 2022.

operates and owns, including on behalf of our co-owner partners, 15 Westfield Shopping Centres across NSW. Each of our Centres provide significant opportunities for employment and in most cases anchor broader activity centres. We therefore take great interest in the proposed Draft Hunter Regional Plan 2041 and look forward to on-going dialogue and engagement with the Department and City of Newcastle.

This submission specifically relates to our asset, Westfield Kotara Shopping Centre, which is located on the corner of Park Avenue and Northcott Drive, Kotara. Westfield Kotara is the largest shopping centre in the Newcastle local government area (LGA), approximately 6 kilometres from the Newcastle CBD. Kotara has historically been recognised as an important strategic centre for Greater Newcastle.

We understand that the Draft Hunter Regional Plan 2041 seeks to update the strategic framework for the region set by the current Hunter Regional Plan 2036. The existing regional plan includes a commitment for its regular review every 5 years to respond to the current challenges and recognise the future opportunities for the Hunter Region.

The submission is summarised below into the key points and recommendations:

- 1. are broadly supportive of the revision of the Hunter Regional Plan 2036 to enable strategic planning policy to stay up to date with current trends and broader policy reform. Specifically, we are supportive of the emphasis on a 24-hour economy and move to mixed use and/or housing-led intensification in and around existing centres to support existing uses.
- 2. Scentre Group are deeply concerned over the inconsistency and potential down grading of Kotara from its current strategic centre status. This is borne from the fact that Kotara is listed as a strategic centre in Appendix A but on the other hand is not reflected in the mapping or body of the Draft Hunter Regional Plan 2041. This uncertainty impacts significantly on long term

investment decision making, particularly when all other Westfield Shopping Centre assets in NSW are designated as strategic centres under relevant the regional or metropolitan strategic framework.

- 3. Kotara must be retained as a 'Catalyst Area' and 'Strategic Centre,' as such the mapping throughout the Draft Hunter Regional Plan 2041 should be updated to reflect this.
- 4. seek for consistency between all catalyst areas, as all catalyst areas have not been treated equally and it is not clear why.
- 5. The Draft Hunter Regional Plan 2036 should not be utilised as leverage to down zone Westfield Kotara in the translation process of the Employment Zone Reform. Based upon the historical positioning of Kotara, Kotara should remain as an important strategic centre within Greater Newcastle. There is no compelling evidence as to why Kotara has not been mapped as a strategic centre.

2.

was created in June 2014 through the merger of Westfield Retail Trust and Westfield Group's Australian and New Zealand management business. owns and operates a high-quality portfolio of 42 centres is valued at \$50 billion.

Our shopping centres operate under the Westfield brand and are an essential part of the community's social and economic fabric. In 2019, over 549 million customers visited a Westfield shopping centre, spending \$25 billion across the Australian and New Zealand Portfolio.

Within NSW, there are 15 Westfield shopping centres positioned within strategic centres across the Greater Sydney, Central Coast and Newcastle region. Providing life and activity to local areas as a one-stop shop for commercial and retail needs, strategically positioning themselves to provide to the local community whilst driving economic activity. Westfield believe the future of retail is changing with a likely emphasis on commercial, residential, recreational, sustainable practices and education becoming more common place.

3. WESTFIELD KOTARA BACKGROIND

Westfield Kotara is the largest shopping centre in the Newcastle local government area (LGA), approximately 6 kilometres from the Newcastle CBD. Westfield Kotara is well served by road, bus and rail links and caters to a total accessible market of 400,000, and has a trading floor area of approximately 80,000m².

The total retail spend by the Westfield Kotara Total Trade Area was estimated at \$6.2 billion in 2021 while the total retail spend by the Main Trade Area was estimated at \$3.5 billion. The total annual retail spend per capita for the Westfield Kotara Main Trade Area is estimated at \$15,378 in 2021, which is in line with the Sydney Metro average (\$15,354).

Westfield Kotara forms part of an important strategic centre for Newcastle and the broader area being 'Kotara', driving economic activity as well as providing a one-stop shop for commercial and retail needs. Kotara has been identified in the Hunter Regional Plan 2036 and the Greater Newcastle Metropolitan Plan 2036, as a 'Catalyst Area,' which outlines the desired role for Kotara as:

Diverse employment centre with mixed-use and high density residential connected to frequent public transport services.

The key point to be made here is that Kotara is an important strategic centre in Greater Newcastle and the strategic positioning in the Draft Hunter Regional Plan 2041 should reflect this. This is discussed further below.

4. DISCUSSION

4.1. STRATEGIC CENTRE DESIGNATION

Kotara is an important strategic centre within the Greater Newcastle given its economic and social significance primarily centred around Westfield Kotara, this is reflected in the current Hunter Regional Plan 2036 and the Greater Newcastle Metropolitan Plan 2036 (GNMP). **Figure 1** illustrates current mapping which highlights Kotara as a 'strategic centre.'

In addition, Kotara is identified as a 'Catalyst Area' for Greater Newcastle within the GNMP. A 'Catalyst Area' is defined as places of metropolitan significance where a planned approach will drive the transformation of Greater Newcastle as a metropolitan city (Page 81 of GNMP).

WALLSEND UNIVERSITY OF NEWCASTLE MAYFIELD JESMOND WARATAH • EWCASTLE LINK HOAD HUNTER TAF JOHN HUNTER HOSPITAL **BROADMEADOW** HAMILTON **OWICKHAM** NEWCASTLE CITY CENTRE ADAMSTOWN annum, • CARDIFF THE JUNCTON KOTARA

Figure 1 Current Hunter Regional Plan 2036



Source: Hunter Regional Plan 2036

Given Kotara's economic and social significance within Greater Newcastle, it must be retained as a strategic centre and further emphasised within the Draft Hunter Regional Plan 2041 as there is no compelling logic as to why it has not been retained as a strategic centre. As illustrated in **Figure 2** below, Kotara and some other identified 'Catalyst Areas' have been separated out and not defined as the higher order strategic centre. This is problematic, and a consistent approach must be taken.

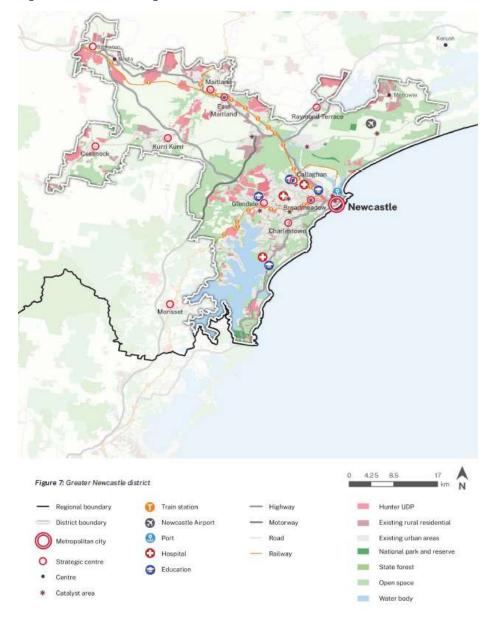


Figure 2 Draft Hunter Regional Plan 2041

Source: Hunter Regional Plan 2036

Similar to Kotara, Broadmeadow has historically been identified as a 'Catalyst Area' and 'Strategic Centre.' This approach has remained consistent in the Draft Hunter Regional Plan 2041 with Broadmeadow identified with a 'Catalyst Area' and 'Strategic Centre' marking. Kotara however, as only been identified as a Catalyst Area.

It is unclear why a consistent approach has not been taken with all previously identified catalyst areas and strategic centres advocate for a consistent approach between these areas to ensure historically consistency and fairness.

A comparison between the Hunter Regional Plan 2036 and Draft Hunter Regional Plan 2041, is outlined below in **Table 1**.

Table 1 Comparison between Hunter Regional Plan 2036 & Draft Hunter Regional Plan 2041

	Hunter Regional Plan 2036	Draft Hunter Regional Plan 2041
Strategic Centre	Identified as a Strategic Centre in mapping and visioning.	Identified as a Strategic Centre in Appendix A. Kotara remains a Greater Newcastle metropolitan Catalyst Area, however this is not reflected as a 'Strategic Centre' in the draft mapping throughout the Draft Plan.
Identified Priorities	Continue to provide regionally significant retail, and support growth and diversification of other employment and economic activities. Investigate opportunities for mediumto high-density housing within (as shop top housing) or close to the centre, in areas not constrained by flooding. Enhance public transport access to other strategic centres in Greater Newcastle.	Kotara within the Draft Hunter Regional Plan does not have specific identified priorities. The identified priorities in the Hunter Regional Plan 2036 remain relevant and appropriate for Kotara moving forward and should be more explicitly referenced within the Draft Hunter Regional Plan 2041.
Future housing and urban renewal opportunities	Investigate new renewal opportunities in centres including The Junction, Georgetown/Waratah, Adamstown, Lambton, New Lambton and Kotara. Investigate and prioritise additional renewal corridors for longer-term growth that supports public transport improvements, including for Newcastle—The Junction— Merewether (Darby Street Corridor); Broadmeadow—New	Kotara is not explicitly referenced in terms of future housing. Greater specificity, similar to the current Hunter Regional Plan 2036, could aid clarity.

	Hunter Regional Plan 2036	Draft Hunter Regional Plan 2041
	Lambton/Lambton; and Adamstown and Kotara.	
Employment	Kotara is identified as a regionally significant centre and employment land cluster.	Once again, Kotara has not been explicitly referenced in terms of its important employment and economic role in Greater Newcastle. This should be more explicitly referenced within the Draft Hunter Regional Plan 2041.

Table 1 clearly identifies the level of detail explored previously for Kotara. The Draft Hunter Regional Plan 2041 has overlooked the importance of Kotara and could be strengthened by reinforcing its key role within Greater Newcastle.

Furthermore, like Kotara, Charlestown plays a similar role in the Lake Macquarie local government area. Charlestown is identified as a strategic centre in Appendix A, which is at the *heart of the surrounding distinct providing a range of civic, retail, commercial and recreational services, and has potential for increased housing and employment will be determined by local councils.*

It is recommended that Appendix A be updated to reflect Kotara as an important strategic centre that has the potential for increased housing and recognises Kotara's critical role in servicing the Newcastle local government area.

In summary, Kotara must be retained as a 'Catalyst Area' and 'Strategic Centre,' as such the mapping throughout the Draft Hunter Regional Plan 2041 should be updated to reflect this.

4.2. GREATER DIVERSIFICATION

is supportive of the "big ideas" in the Draft Hunter Regional Plan 2036, specifically greater diversification of employment generation lands to support economic renewal and innovation and open opportunities for renewal and change to new land uses (Page 11).

As noted previously, our centres are forever evolving and providing life and activity to local areas as a one-stop shop for commercial and retail needs. However, when we look to the future, believe that the retail space is changing with a growing emphasis on commercial, residential, recreational, sustainable practices and education. Evidence of the continued evolution of our centres in NSW from pure retail to true mixed-use in recent times include:

- JV with cbus to deliver an iconic new Westfield retail transformation of the former David Jones Market Street site with a podium residential tower within Sydney CBD.
- Development consent for a commercial office tower in airspace above Westfield Liverpool.
- Recent submission of a Planning Proposal to deliver commercial office and hotel accommodation in two iconic towers in airspace above Westfield Penrith.
- Our current JV with Aqualand to deliver the retail components associated with the Central Barangaroo precinct and that will connect through the Barangaroo Metro Station.

 Planning proposal to deliver commercial office floorspace at Westfield Eastgard 	audella	adi deli.	_astaaraci	VESUIEIG EC	at Mestilei				o deliver	DIODOSAI LO	I Idililii	
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 Commercial office tower envelope approvals for Westfield Parramatt 		Commercial	office towe	r envelope	approvals	for Westfield	Parramatta.
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is supportive of Objective 7 of the Draft Hunter Regional Plan 2041. Particularly the focus of commercial and retail activities in already existing commercial centres. We are also supportive of emphasis on a 24-hpur economy and move to mixed use and/or housing-led intensification in and around centres to support existing uses.

4.3. ALIGNMENT WITH EMPLOYMENT ZONE REFORM

have taken great interest in the employment zone reform and have had on-going dialogue with Department regarding the reform, specifically how the simplified zoning framework will support productivity, job growth and employment and how the translation of zones will occur.

The Department would be aware of position regarding the translation of zones, and our call for greater alignment between zoning and strategic planning overlays.

Currently there is a mis match between the strategic centre designation of Kotara under the Hunter Regional Plan 2035 and the current B2 Local Centre zone, this needs to be rectified. However, the Draft Hunter Regional Plan 2041 further adds to the confusion regarding the misalignment between the role and function that Kotara plays as a strategic centre and its zoning designation.

This misalignment needs to be corrected to truly recognise Kotara's importance in Greater Newcastle.

5. CONCLUSION

Yours sincerely,

appreciates the opportunity to participate in the consultation process, however we are deeply concerned about the inconsistency and potential down grading of Kotara from its current strategic centre status.

We have concerns regarding the Department's intentions for Kotara, particularly as the GNMP reinforces Kotara's strategic role within Greater Newcastle. This needs to be clarified as a matter of urgency and we will be approaching the Department to arrange a time to discuss our concerns further.

I can be contacted on the number below if you have any questions in the meantime.



28 February 2022

Department of Planning - Hunter Office P.O. Box 1226 Newcastle NSW 2300

Submitted via email: hunter@planning.nsw.gov.au

Dear

Submission to the Department of Planning on behalf of Newcastle Airport in regard to the Draft Hunter Regional Plan

The following submission has been prepared by Barr Planning on behalf of Newcastle Airport.

Newcastle Airport has a vision of "Delivering the airport the region deserves". The region, according to the Draft Regional Plan, has a vision to be "The leading regional economy in Australia, connected to and caring for Country, with a vibrant metropolitan city and sustainable 15 - minute neighbourhoods at its heart".

We would like to congratulate the Department of Planning on their strategy and their vision for the Hunter Region. The purpose of this submission is not to object to the strategy but rather to endorse it and to demonstrate the importance of Newcastle Airport in meeting the vision and objectives established for the region.

To continue to be the regional leading economy in Australia, the region must leverage the key economic drivers available, such as the airport and associated aero related development. The Airport is at the centre of the Williamtown Special Activation Precinct (SAP), which is positioned to become Australia's leading national and international defence, aeronautics and aerospace hub. The Williamtown SAP will capitalise on Newcastle Airport's growth and expansion plans, the emerging aerospace industry around the Royal Australian Air Force (RAAF) base and the developing Astra Aerolab precinct.

The below submission outlines some of the key factors that we feel could be further emphasised in the Hunter Regional Plan to reflect the airports critical role as a driver of the regional economy, a significant employer and a catalyst to achieve the Regional Plans objectives as a vibrant metropolitan city.



1. Regional Plan Objectives

The Plan has outlined 8 objectives that will deliver on the vision for the region, of note the following will be achieved via the opportunities that the airport provides;

OBJECTIVE 1: Diversify the Hunter's mining, energy and industrial capacity

- Recognises the shift away from Coal over time as an energy source.
- Build industrial capacity in areas that have access to transport, support key industries, provide
 opportunities for a range of business sizes and support access to supply chains.

OBJECTIVE 8: Build an inter-connected and globally focused Hunter

- Aviation and port related development proposals should align with the growth of defence and aeronautics and aero-space related industries.
- Increase capacity to manage freight.
- Support and protect inter regional freight and logistics movements.
- Protect the long term growth of defence assets from incompatible land uses.

The region is facing one of its greatest challenges in seeing the closure of coal fired energy, and the impacts this will have on the coal industry locally, together with the broader shift away from coal as an energy source.

The Draft Regional Plan needs to recognise the importance of the airport in assisting the region to diversify in the long term.

The opportunities that the airport provides to achieve this include;

- Direct to Asia and overseas markets for freight, business and tourism.
- Protecting the airport asset, in terms of the runway for both Newcastle Airport and defence use to ensure that development does not encroach on this asset over time allowing for increase in passenger numbers and the types of aircraft that may use the asset in the future.
- The opportunity for the airport to continue to drive employment growth in the region.

2. Economic Opportunities

To better understand the opportunities that the airport provides in terms of economic benefits for the region, an economic impact assessment was prepared by Morrison Low in 2022 which calculated the financial and employment benefits in the areas of airport operations, airport precinct and visitor impact. The summary of these total annual benefits is shown below;



	Airport opera	itions	Airport Pr	recin	ct	Visitor impac	t
	Industry	Direct	Industry		Direct	Industry	Direct
	output (\$	Employment	output	(\$	Employment	output (\$	Employment
	million)	(FTEs)	million)		(FTEs)	million)	(FTEs)
Total	43.8	185.8	900.6		2135.1	729	3397.8

Based on the above figures, there is a total annual economic benefit of approximately \$1.67 Billion and FTE employment of more than 5700 people.

The economic impact assessment produced by Morrison Low for the airport in 2022, made the following statements regarding the value of the airport to the region;

Regional airports, such as Newcastle Airport, play vital roles in sustaining regional economies and communities, enabling access to specialist health, education, commercial and recreational facilities, and facilitating social connections. Newcastle Airport is also a key facilitator of tourism, which is a significant economic driver for the Greater Newcastle region.

Based on the above information it is clear that the airport is a significant economic driver for the Region and it is essential that both the development and protection of the airport is prioritized to meet the vision outlined in the Draft Strategy, in particular, "being the leading regional economy in Australia"

3. Catalyst for Employment

The Deloitte Access Economics report, Connecting Australia, the Economic and Social contribution of Australia's airports (2018) provides some guidance on the likely catalytic activities that airports provide.

There are two key spillover effects;

- Global Accessibility and Trade better access to larger markets; and
- Productivity through increased mobility which facilitates the productive operation of other sectors of the economy.

Airports have provided greater economic integration between national and global markets, providing easier access to suppliers, staff and customers and increasing business efficiency. These opportunities manifest themselves in three key areas;



- Inward Investment access to road, rail and port infrastructure together with available adjoining land, airports can grow into national logistics centres driving increased freight through trade.
- Tourism Airports provide the opportunity for a wide catchment to be brought to the Hunter and surrounding regions by providing access to tourists, which can provide a major economic impact for the Region.
- Commercial Activity Better access to domestic and international markets drive business growth were these business can locate close to an airport.

Newcastle Airport identifies all of these opportunities through the potential to increase freight movements, bring tourists to the Region and lastly, driving business growth through adjacent industrial land and synergies with key industries such as defence.

The introduction to this submission outlined the current employment generation that the airport delivers, which is in the order of 5,700 people across the airport operations, the airport precinct and the visitor economy.

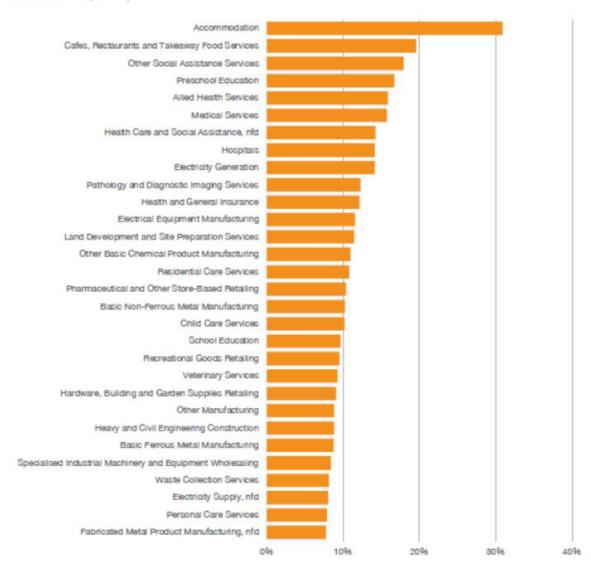
The economic impact assessment undertaken for the airport identified the highest employment growth by industry class expected for Greater Newcastle. The graph below shows that accommodation and food services are the sectors that will likely experience the most significant growth between 2020 and 2025. These industries are linked to tourism and demonstrate the potential for the airport to drive employment growth in the Region. This is mirrored in the Draft Strategic Plan which identifies tourism as a sector to grow in the regions.





Figure 6 Highest employment growth by industry class

Highest Employment Growth by Industry Class Greater Newcastle (2020-25)



The strategy also identifies the following areas for future growth for the region, this includes health, education, defence, tourism and the creative sectors of the economy. In regard to education, the University is currently looking to grow their intake of students from Asia, a direct connection to Asia from the airport will bolster this



lucrative and important opportunity. Defence, due to the links between Williamtown airbase and the airport, the opportunities to drive defence related business in the Hunter are significant.

The airport was recently awarded a grant from the Federal Government to extend the runway to allow Code E aircraft which can accommodate long range aircraft that can fly international routes extending into Asia, the United States, South America and South Africa. The opportunities this creates to drive the key areas of freight, education and tourism will provide a significant catalyst for jobs in the Hunter Region.

The opportunities created by the extended runway include the creation of an additional 4,410 full time jobs in the long term and \$12.7 billion in regional economic benefit over the 20-year life of the asset.

4. Freight opportunities

The Newcastle airport vision identifies freight demand as a significant opportunity to increase air traffic. Newcastle Airport currently handles approximately 100 tonnes of air freight per annum, all of which is transported as belly freight. However, this is far below the maximum capacity and there is significant opportunity to increase domestic belly freight carried into and out of Newcastle, as well as international freight in conjunction with the introduction of direct passenger services to/from ports in South East Asia in the future. This opportunity has the potential to benefit the region directly and NSW more broadly.

The target catchment is from North Sydney, the Central Coast, Hunter Region, mid North Coast and northern inland NSW, based on road connections and business that would use freight services.

The opportunities lie in the areas of fresh produce, agriculture, defence and mining equipment. Access to key agriculture export regions which specialise in high-value and time sensitive export products such as wine, seafood, and beef meat products, is a unique differentiator for Newcastle Airport and the region.

The potential freight handling capacity of the airport is expected to grow to 2500 tonnes per annum, based on the airports strategic plan. This could be supported by the development of a future freight terminal.

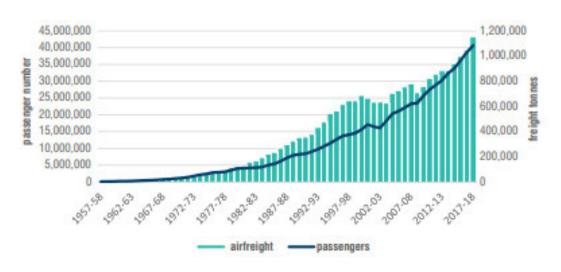
To understand the opportunity this presents (based on the 2019 international air freight indicator):

- \$1 in every \$5 of Australia's goods travels by air freight, but this represents less than one percent of trade volumes.
- 2017-18 saw 1.15 million tonnes representing \$109 billion. Based on this conversion, 2500 tonnes would represent trade to the value of \$210 million annually.
- The movement of freight is linked to passenger movements with 80% of all air freight being moved on passenger aircraft.

The following graph shows the correlation between passenger numbers and air freight;



Figure 3: Relation between passengers and airfreight



Source: IPA/BISOE based on BITRE statistics

Newcastle airport has predicted the conservative increase in passenger numbers over the long term as a base case, as shown below;

BASE CASE FORECAST	SUMMARISED RESU	JLTS - PASSENG	ERS				
		2015	2016	2021	2026	2036	2076
		Actual	Actual	Forecast	Forecast	Forecast	Forecas
Domestic		1,139,700	1,216,624	1,363,500	1,525,700	2,288,800	4,532,500
				82,900	240,500	360,300	1,043,200
TOTAL	pax	1,139,700	1,216,624	1,446,400	1,766,200	2,649,100	5,575,700

A high case passenger increase would represent nearly a doubling of passenger numbers for the airport.

Based on the above, the freight opportunities for the airport, and therefore the opportunities for the region, are significant and cannot be ignored in delivering on the objectives of the plan.



5. Protecting the Airport from future development

In considering future passenger growth and freight movements, it is important that the Regional Plan identifies what level of protection is required to allow the airport to achieve its potential. In this regard, the strategy should consider the development of sensitive receivers, such as housing, schools, childcare centres and places of public worship and other community-based spaces in the vicinity of the airport.

The following represents a potential methodology that any development or rezoning should consider as part of protecting the future operations of the airport and ensuring that future development is not located inappropriately, so that development does not meet amenity requirements for the users of those developments.

The following information is provided based on advice received from RAPT Acoustic consulting.

Currently the Williamtown Defence Base has ANEF noise contours which encircle the site, demonstrating the likely noise impacts in concentric shapes. These noise contours are linked to planning policy to avoid inappropriate development of land around the airport. These contours are based on a noise prediction to 2025.

As the current noise prediction contours are only to 2025, it is important to protect the airport in the long term given the strategy is projecting out over 25 years.

The National Airport Safeguarding Framework, developed by the Commonwealth Governments National Airports Safeguarding Advisory Group (NASAG), was drafted to provide guidelines to assist local governments in regulating and managing a range of issues and notes:

• The established Australian Noise Exposure Forecast (ANEF) System and the Australian Standard AS 2021-2015 Acoustics – Aircraft Noise Intrusion – Building Siting and Construction (AS2021) have been recognised by a number of jurisdictions in their land use planning regimes. However, AS2021 recognises that the 20 ANEF and 25 ANEF zones do not capture all high noise affected areas around an airport, and the ANEF contours are not necessarily an indicator of the full spread of noise impacts, particularly for residents newly exposed to aircraft noise.

The Contours are established through a process detailed in AS 2021 Acoustics, this outlines that aircraft noise intrusion within a building depends substantially on;

- The location, orientation and elevation of the site relative to the aircraft flight paths;
- The types and frequency of aircraft operating from the aerodrome;
- Meteorological conditions;



- The types of activity (including sleep) to be, or being accommodated in the building;
- They type of layout, construction and ventilation used; and
- The internal acoustic environment.

The standard also outlines that it is difficult to define accurately, mainly because of variation in aircraft flight paths. Because of this, it is reasonable to assess developments outside but near the ANEF 20 contour.

The publication *Guidance Material for Selecting and Providing Aircraft Noise Information 2003* recommends that the selection of appropriate information to represent aircraft noise levels requires consideration of the specific aspects of the airport in question. The guidance also notes that the magnitude of aircraft noise issues varies widely from airport to airport, depending on variables such as the type of aircraft, including military or civilian, the number and times of operations and whether flight paths go over residential land, or other types of noise sensitive land use.

Accordingly, the 2003 Guidance Document puts forward a number of aircraft noise information options and indicates that, if a meaningful picture is to be painted of aircraft noise exposure patterns around an airport, the following information should be provided at minimum:

- Where the flight paths are;
- At what times aircraft use a flight path (in particular, sensitive times night/early morning, evenings and weekends);
- How often aircraft use the flight path;
- Variations in activity levels from hour to hour, day to day, week to week, etc; and
- Noise levels from individual flights.

The above approach could be used as additional guidance by strategic planners and weighed along with other relevant strategic considerations. Airport Traffic Management Plans provide informative detail regarding flightpaths and are a useful reference tool.

The requirement we would request is that any rezoning undertaken within a buffer zone which extends beyond the ANEF 20 contour around the airport must consider the current and future noise outputs of both the civilian and military airport against the proposed land use. The proposed buffer zone would require an assessment the application against future noise generation of the airport against the most sensitive land use that is permissible with consent in the zone. This would typically be residential properties, schools and medical facilities. The airport would be willing to work with the Department to establish the extent of the buffer zone.

This will provide an opportunity to protect the operations of the airport and allow the airport to continue to drive economic activity for the region through the influence it has on key growth sectors such as tourism, education and freight which are all identified in the Regional Strategy over the life of the strategy.



6. Recommended Changes to the Draft Hunter Regional Plan

The following specific inclusions are recommended for consideration in the finalisation of the Hunter Regional Plan.

- Recognition of the airport as a key enabler of economic growth for the region through both the creation of full-time jobs and the economic investment in the community.
- The protection of the airport via careful assessment of the impacts of development on the airport and the noise generated on the airport on the proposed development, to avoid poor land use outcomes that limit future growth.
- Recognition of the key growth area of tourism for the region and the critical role that the airport plays in driving this growth and creating investment in the region.
- The opportunities to increase freight through the airport providing access to new markets and time sensitive high value products driving economic growth for the broader region

If you have any queries regarding this information, please do not hesitate to contact me as below. Thankyou for your consideration of this submission.

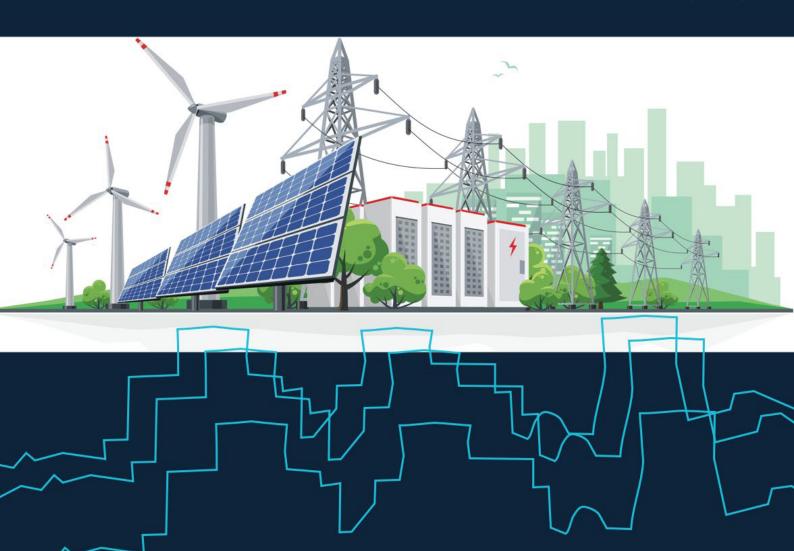
Yours sincerely.





A PLAN FOR THE HUNTER FRONTIER OF THE NEW ECONOMY

MARCH 2022



A PLAN FOR THE HUNTER

RECOMMENDATIONS

- 1. Unite all levels of government, business, industry and the community on a plan to diversify the Hunter economy, secured by an intergovernmental agreement and funding for delivery:
 - Triple the number of local jobs currently occupied by coal mining and energy in a diverse range of industries over the next decade, ensuring no jobs are lost as the economy changes
 - Position the Hunter as a global centre for Net Zero and clean energy
 - Bring the socio-economic outcomes experienced by Hunter communities on parity with the Sydney metropolitan region.
- 2. Targeted public investment in shared infrastructure and precincts:
 - Major catalytic projects
 - Government-led precincts
 - Community and local infrastructure
 - Renewable Energy Zone transmission and storage infrastructure
 - Hunter hydrogen hub
- 3. Establish a dedicated investment concierge service to proactively drive investment in clean energy businesses and jobs.
- 4. Co-design a new educational model for the Hunter that creates pathways for learners across schools, vocational and tertiary education, industry, research and governments to build the workforce of the future.
- 5. Establish central transition service functions in the region:
 - Worker transition centre
 - Business transition centre
- 6. Extend the NSW Royalties for Rejuvenations fund to cover workers, business and communities affected by the closure of coal fired power generators, in addition to royalty-producing mining communities.
- 7. A strategic approach to the adaptive reuse of ex-mining and power station land, infrastructure and supply chains to support high growth industries.

THE HUNTER: FRONTIER OF THE NEW ECONOMY

Origin Energy's decision to close Eraring Power Station seven years earlier in 2025 sent shockwaves through the region and nation

The <u>announcement</u> follows AGL's decision to close Liddell Power Station in 2023 and bring forward the retirement of Bayswater Power Station to as early as 2030.

There are concerns from Hunter businesses and the <u>Australian Government</u> that closures will impact energy prices and reliability

The NSW Treasurer and <u>AEMO Chief</u> are confident there is enough generation capacity already in the development to cover the gap from these closures and avoid cost, security and reliability risks. And there are more generation projects set to enter the pipeline. Over <u>40 gigawatts and more than \$100 billion investment in clean energy proposals</u> emerged through the Hunter-Central Coast Renewable Energy Zone (REZ) registration of interest.

Expert advisor Dr Kerry Schott said that Eraring's closure could be managed without causing price-spikes and the only immediate upward pressure would be the cost of transmission lines needed to connect new renewables to the grid. The NSW Treasurer has also announced a plan to build the biggest battery in the Southern Hemisphere and committed to transmission infrastructure under the REZ.

While there are technology solutions to these changes and added urgency to convert plans into actions at scale, we must also focus on the impacts on people

The communities of the Hunter region are affected more than most as the world moves to low carbon energy and Net Zero. We also have the most to gain.

While discussions tend to focus on coal mining, we are seeing the impacts on workforce and communities earlier from the closure of coal fired power stations.

That's why the <u>Committee has called for</u> the NSW Royalties for Rejuvenation fund to extend to these communities in addition to royalty-producing mining communities.

A <u>jobs package</u> was announced by the NSW Government in response to Eraring's closure, to grow clean industries across the state.

Experience tells us that if we are talking about a <u>jobs package at the point of closure of major industry</u>, it's getting too late. With advance notice, the Hunter is thankfully in a different situation than the Latrobe experience. But there is no more time to lose.

If an experienced and skilled workforce faces an uncertain outlook and leaves the region to find work, it will get much harder to grow.

As major employers close over time, it will be important that public funding does not diminish the responsibility of corporations to fund rehabilitation, pay out entitlements, and provide transition services to affected workers.

With multiple power stations and mines in the region scheduled to close over the next decade, there is an opportunity to expand the collaborative work at Liddell to establish a central worker transition service in the region

Partnership approaches that pool expertise and resources will deliver better results for people, companies and the economy.

The Committee has also identified a need for <u>a dedicated office to provide tailored engagement</u>, <u>direction and services to SMEs in coal supply chains</u>. Businesses have a strong of understanding of the disruption ahead but say there is no clear pathway or support to help them diversify clients and services to protect jobs. Services could include financial planning, e-commerce, trade and exports, legal advice and mental health.

Diversification of the Hunter economy has to be the question that everything we do in the region is an answer to

The task is to attract investment in new jobs in sectors of competitive advantage to create demand for labour. Sectors that can leverage the built assets, supply chains and workforce capabilities of coal industries should be prioritised:

- For the Hunter the <u>big three industries of growth</u> are **clean energy, defence and health**. All create demand for our region's mature and innovative manufacturing capabilities.
- The Hunter has a head start to become a global hydrogen export hub. The <u>Hunter Hydrogen</u>
 <u>Roadmap</u> sets out the pathway, including the projects, infrastructure and enablers needed
 to get there.
- The unsung drivers of jobs and competitiveness in the Hunter are knowledge industries, including professional and scientific, finance, insurance, education and training. Firms in these sectors thrive on proximity and agglomeration, requiring a uniquely urban solution to grow, including a strong arts and culture scene, world class digital and public transport services, and amenity for a smart and skilled workforce.

So how do you grow a job?

The toolkit includes public investment in shared catalytic infrastructure to provide certainty and direction to mobilise private investment. This includes the international gateways of the Port of Newcastle and Newcastle Airport that connect the Hunter to the global economy, and inter-regional connectivity.

We continue to <u>talk about</u> how critical unlocking the Multi-purpose Deepwater Terminal is to our region's future. The recent <u>Hunter Global summit</u> focused government and business on activating opportunities for the region's growth and development offered by the international upgrade of the Newcastle Airport. These two projects will bring a combined 14,000 new jobs to the Hunter region – the equivalent currently employed locally in coal mining.

Setting a more ambitious target for travel time on the <u>Sydney – Newcastle rail corridor</u> and a program of upgrades to get there is also important. This will strengthen the Hunter's role as the Northern anchor of the global Sydney megaregion.



A portfolio of smaller projects can deliver big returns

\$500 million in enabling infrastructure – mostly transport – will release more than \$20 billion in development, 40,000 homes and 28,000 jobs in the Hunter. This includes the \$40 million Mandalong Road upgrade that will unlock industry, jobs and homes in the Morisset growth centre and incentivise redevelopment around Eraring Power Station. In the knowledge economy, investments that improve liveability like community infrastructure, public space, art and culture, can now also be considered essential economic infrastructure.

Government led precincts are an incredibly powerful lever to improve services for communities and deliver strategic objectives for jobs

These include the John Hunter Health and Innovation Precinct, the New Maitland Hospital, Williamtown Special Activation Precinct and Hunter Park. Our <u>2022 NSW budget submission</u> sets out the next steps we think necessary in moving these projects forward.

The long-term decline of coal industries releases strategically located and serviced land, transport corridors, water licences and supply chain functions across the region

These assets can be harnessed to grow industry and new jobs. While plans are advancing on sites in the Upper Hunter, including Muswellbrook Coal and Liddell Power Station, the Committee for the Hunter has been working with our members in coal supply chains on a regional approach to the repurposing of these assets.

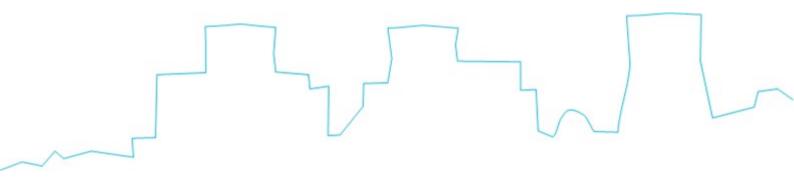
With a sequence of closures scheduled over the coming years and decades, this is something the region will need to get good at. This should consider higher and better value uses for ex-coal lands and infrastructure, then bringing back to bush and pasture.

Providing an open invitation to business backed by a dedicated investment concierge service will accelerate and scale job-creating investment in the region

The overwhelming response to the Hunter-Central Coast Renewable Energy Zone confirms the potential. The Hunter Defence Taskforce has provided a more strategic and proactive approach to investment attraction to grow defence industries. There is scope for a similar investment concierge function focused on clean energy across the value chain, including manufacturing, research, technology, retail, finance and export in addition to generation projects.

Access to a smart and skilled workforce is frequently cited by incoming business as a condition of investment in the Hunter

While we work to address current labour force shortages, it is important to cast our eye on future demands and opportunities. Regional leadership is aligned on the need for new pathways for learners across schools, vocational and tertiary education, industry, research and governments. Instead of fighting individual TAFE closures, efforts need to be directed to the co-design of a new educational model for the Hunter.



The Hunter Jobs Alliance joins experts and growing political support to call for a central authority for worker transition and industry growth, with communities at the centre of decisions

The recent inclusion of the Hunter in the <u>Greater Cities Commission plan for six cities</u> represents an immediate opportunity to move forward, quickly. The Committee for the Hunter is working with regional representatives and the NSW Government to shape this significant governance reform to provide the leadership, focus and investment needed.

Coordination of planning, infrastructure and budgets across agencies, governments and sectors will deliver better outcomes from public focus and investment in the region

The Committee continues to advocate for the measures in this paper to be integrated in an ambitious plan for the Hunter and a <u>tri-level government agreement</u> established to deliver this.

Arrangements like City Deals have not readily divested decision making to communities or councils. The opportunity presented by governance reforms like the Greater Cities Commission is to embed local priorities into central authority and decisions to align public budgets with the private investment necessary to create jobs.

The discourse on the future of the Hunter has shifted rapidly from a level of resistance to change, to the urgent need to save jobs

<u>Local leadership is more pragmatic</u>, proactive and constructive on the task ahead than national debate would imply.

Rich in infrastructure, natural resources and a skilled workforce – much of this built for and by coal industries – the Hunter can afford to have a much more ambitious vision for the future jobs than a zero sum game.

Clear targets for jobs, Net Zero and living standards will cut through the complexity to provide direction to the task of transition and accountability for delivery:

- 1. The immediate priority is to align government, business, industry and communities on an objective to **multiply local jobs occupied by coal mining and electricity generation** in a diverse range of industries over the next decade. With over 15,000 workers in these industries, a target of tripling these jobs in ten years (45,000) still only goes part way to delivering the number of jobs required to meet straight line projections in the Hunter Regional Plan 2036. We can aim higher still with a good strategy.
- 2. As the world decarbonises, the Hunter is primed to be positioned as a global centre and investment destination for Net Zero and clean energy. Low emissions must be built into the region's development trajectory to remain competitive. There is significant capital to be harnessed, and the region has growing production and services to supply this demand.
- 3. We need development and change to **improve living standards across the Hunter**. This includes housing, infrastructure and services to support a growing population. The Hunter has the scale and capacity to drive these benefits at the State and national level. The disparity between the socio-economic outcomes of Hunter communities and our Sydney neighbours is not explained by being remote or a lack of resources. With people being the most important resource in the new economy, we need to do better to share the benefits of growth.



The closure of Eraring Power Station and the bold takeover bid for AGL to accelerate the retirement of coal power stations shows that change is coming quicker than anticipated

The Hunter has the tools and local know-how to thrive from this disruption. It has done this before with the closure of BHP in the 1990s.

The region proudly stands on its own two feet because of this achievement and our substantial contribution to national prosperity. The Hunter also needs leadership from the NSW and Federal governments given the scale, urgency and significance of the challenge.

Australia's commitments to Net Zero and future competitiveness in a global economy depend on what happens in the Hunter

We are on the cutting edge of change and have the opportunity to shape our destination. Through smarter, more joined up and longer-term planning and investment, the Hunter has what it takes to be a global leader in the new economy.

Success will be forged from the people, assets and capabilities of traditional coal industries, creating an enduring connection between the Hunter's past and an even better future.

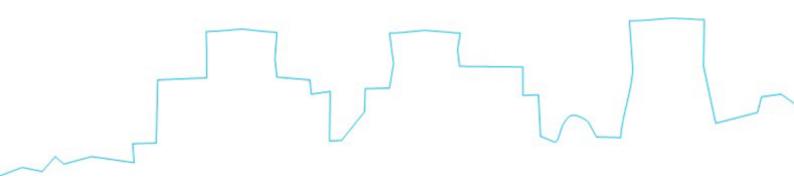
ABOUT THE COMMITTEE FOR THE HUNTER

The Committee is an independent and inclusive champion for the people of the Greater Hunter and their enterprises. Representing over 60 organisations including some of the largest employers, institutions and peak bodies in the region, we provide a unified voice for the Hunter. Our members are drawn from the private and community sectors and all three levels of government. We come together with a shared interest in building a sustainable, prosperous and equitable future for our region. The Committee delivers on that promise through advocacy, thought leadership and providing a platform for collaborative action between governments and the region.

The diversification of the Hunter economy is a <u>strategic priority</u> of the Committee.

For more information on priorities and projects visit www.hunter.org.au.

Contact





DRAFT HUNTER REGIONAL PLAN SUBMISSION

MARCH 2022



Department of Planning, Industry and Environment Draft Hunter Regional Plan 2041 hunter@planning.nsw.gov.au

4 March 2021

Thank you for the opportunity to make a submission on the draft Hunter Regional Plan 2041 (draft Plan).

ABOUT THE COMMITTEE FOR THE HUNTER

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The diversification of the Hunter economy is a <u>strategic priority</u> of the Committee.

For more information on the Committee and regional priorities and projects visit www.hunter.org.au.

KEY POINTS

More emphasis on strategic planning

The draft Plan is being prepared in accordance with the *Environmental Planning and Assessment Act* 1979. The Act emphasises regional plans as strategic plans setting out a vision, objectives and the strategies and actions for achieving these objectives.

The draft Plan is positioned in the document and functions more as a land use and development plan, amalgamated from council (ten LGAs) Local Strategic Planning Statements and strategies.

This could be balanced with a top-down approach to regional priorities and more focus on the projects, strategies and actions that will achieve these. This will complement and provide direction and certainty to councils and developers to deliver at the district scale.

Establish a more ambitious vision for the Hunter to inform priorities and actions

The vision described in the draft Plan is sound, reflecting triple bottom line principles. However, with the broad focus, it does not distinguish the Hunter and our competitive advantage from any other place.

The biggest disrupter to the region over the next twenty years is Net Zero and the structural decline of coal industries including mining and electricity generation. It also presents the region's biggest opportunity with leadership and a plan.

The diversification of the Hunter economy has to the be question to which everything we do in the region – including the Regional Plan – is a response to.

NSW goals for Net Zero depend on what happens in the Hunter. The region's communities are affected more than most as the world moves to low carbon energy and Net Zero. We also have the most to gain.

Home to the world's largest coal export port, the State must look beyond royalties to productivity for economic growth. It is in NSW's long-term interest to pursue a more diversified economy than services sectors concentrated in the Sydney metro.

We encourage a more ambitious vision and targeted set of objectives to provide more direction to the Plan and accountability for delivery.

The Vision is to *strengthen* and not just maintain the Hunter as the leading regional economy in Australia:

- 1. Triple the number of local jobs occupied by coal mining and electricity generation in a diverse range of industries over the next decade. With over 15,000 workers in these industries, a target of tripling these jobs in ten years (45,000) still only goes part way to delivering the number of jobs required to meet straight line projections in the Hunter Regional Plan 2036. We can aim higher still with a good strategy.
- Position the Hunter as a global centre and investment destination for Net Zero and clean energy. Low emissions must be built into the region's development trajectory to remain competitive. There is significant capital to be harnessed, and the region has growing production and services to supply this demand.
- 3. Growth and development to **improve living standards across the Hunter**. This includes housing, jobs, infrastructure and services to support a growing population. The Hunter has the scale and capacity to drive these benefits at the State and national level. The disparity between the socio-economic outcomes of Hunter communities and our Sydney neighbours is not explained by being remote or a lack of resources. With people being the most important resource in the new economy, we need to do better to share the benefits of growth.

Plan for a population of 1 million

The draft Plan has a 20 year time horizon to 2041, while focusing on actions over the next five years until the next review.

While the Vision projects population will be 860,000 by 2041, the draft Plan should explicitly focus on and set up the structures to support a population of 1 million. This will provide more certainty around a plan and investment to manage the challenges of growth and capture the benefits.

Embed quantitative targets for housing

Targets for housing supply will inform priorities, actions and measure progress. The Hunter has entered a housing affordability crisis. It is more important than ever that the Regional Plan identifies housing supply – not just diversity – as a clear priority and provides transparent reporting on delivery.

Identify future major infrastructure needs for further study and gateway processes

A top down approach to regional planning will reveal key corridor and public infrastructure requirements that Government has not yet committed to. As a future-focused strategy, it will be important that the Regional Plan identify these needs to trigger further studies and business cases to move these priorities forward given the long lead times for project planning and delivery.

Identifying these future needs in the Hunter Regional Plan should be understood as a commitment to good process rather than a project.

Focus on delivery

The draft Plan is to be commended for listening to stakeholders and focusing on delivery through the 'Infrastructure first and place-based framework' (Part 1). This aligns with Committee advocacy for Place-based Infrastructure Compact approaches to be adopted in the region. It will be important for further consultation on the model to ensure it facilitates and does not slow down the right

development in the right place at the right time through additional governance, process and gateways.

There is a current backlog of development stuck in the planning pipeline. Addressing this requires focus and funding now while we work collaboratively towards a more normative process of integrated planning, delivery and resourcing.

Synchronise the objectives, priorities, content and release of the Hunter Regional Plan and Hunter Regional Transport Plan

Best practice integrated land use, transport and infrastructure planning is a priority in the Committee's strategic plan.

Land use and transport planning has not been sufficiently joined up in the Hunter. Over \$20 billion in housing and commercial developments are held up by transport infrastructure delays across the Hunter. Those developments could deliver more than 40,000 homes and \$37 billion in economic benefits to the region.

There is an opportunity for better integration with the concurrent drafting of the regional and transport plans. The draft Plan sets out outcomes for housing, accessibility and equity that rely on actions and investments in the transport portfolio.

The draft Plan therefore will need to inform priorities and projects in the Hunter Transport Plan, and vice versa. We are looking for more markers of this feedback and optimisation across the plans in the drafting process and output.

The exhibition period for the draft Plan will close before the draft Hunter Transport Plan is released for public comment. The final plans should be released at the same time and demonstrate clear evidence of integration of land use and transport planning and priorities.

15-minute region

The draft Plan sets out as aspiration for a 15-minute region where people can access most of the things they need without a personal vehicle.

The challenge for the Hunter is not travel time – indeed most residents would state they already live in a 10 or 15-minute region. The priority is to provide more transit options, in particular public transport, to reduce car dependency.

This need is recognised in the draft Plan, however the Strategies in Chapter 3 focus on development solutions. These will not be effective in addressing the problem. The draft Plan raises the issue without acknowledging that the NSW Government holds powerful levers to achieve this objective.

We are seeking a significant commitment to improve and increase public transport services in the region through this Plan, as a direct responsibility of the NSW government. This provides an example of how the draft Plan and the Hunter Transport Plan should be heavily interfacing.

An immediate priority is also an assessment and strategy to address the gaps in existing centres impeding the improvement of a 15-minute regional experience, for example education, social services and open space.

A more strategic approach to the adaptive reuse of coal lands, transport corridors, water licences and supply chain functions across the region

The long-term decline of coal industries releases strategically located and serviced land, transport corridors, water licences and supply chain functions across the region. These are incredibly powerful assets to be harnessed for regional development and to achieve the objectives of the draft Plan.

Plans are advancing on sites in the Upper Hunter including Muswellbrook Coal, Liddell and now Eraring in Lake Macquarie.

With a sequence of closures scheduled over the coming years and decades, this is something the region will need to get good at – something the draft Plan recognises.

The scope in the draft Plan should extend to coal-fired power plant sites and assets in addition to mining. It should also include the transport corridors outside of the gates of these sites that link into domestic supply chains and international gateways.

The regional plan should dedicate significant focus to outlining a strategy for the adaptive re-use of coal assets and corridors in additional to land use principles and development approvals.

Greater Cities Commission

In December 2021 the NSW Premier announced the creation of the Greater Cities Commission (GCC), expanding the remit of the Greater Sydney Commission to Newcastle, Central Coast and Wollongong.

Further details on the role, scope and governance of the GCC have not yet been publicly announced.

Upon establishment, the Greater Sydney Commission produced the Greater Sydney Regional Plan: A Metropolis of Three Cities.

We are looking for more guidance on the role and relationship of the GCC in regional planning and important outputs like the draft Plan before it is finalised, along with the Greater Newcastle Metropolitan Plan (five-year review scheduled in 2023).

Fundamentally the objective is alignment of regional, metropolitan and council plans and cadence.

OTHER COMMENTS

- Meet current commitments for timely reporting on land supply, housing and commercial development, and demand (Part 1: Making it happen).
- Strongly support the objective and strategy for economic self-determination for Aboriginal communities and a stronger role in regional planning (Objective 2).
- Include a strategy to increase and improve and the stock of social housing (Objective 4).
- Include a strategy for complimentary land use around international gateways to protect and enhance their function and expansion into the future (Objective 8).
- Include strategies to enhance inter-regional linkages including commitments to reducing travel times and improving services rail on the Newcastle to Sydney corridor in the immediate future (Objective 8).
- Clarify the relationship, hierarchy, governance and delivery of the draft Plan with the Greater Newcastle Metropolitan Strategy (Part 3).
- Include Eraring Power Station as key precinct for economic development (Part 3: Central Lakes).

From: Subject:

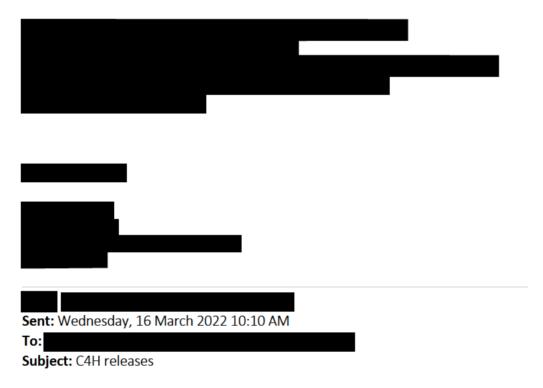
Fwd: C4H releases

Date: Attachments: Thursday, 17 March 2022 9:09:26 AM

C4H A Plan for the Hunter.pdf 20220304 Draft Hunter Regional Plan Committee for the Hunter final.pdf

Sent from my iPhone

Begin forwarded message:



Hi

FYI have attached our response to the Draft Regional Plan.

Also our (structural adjustment) plan to triple the number of jobs currently occupied by coal mining and generation.

Don't hesitate to reach out if you would like to discuss these.

I see you are coming along to the PIA gig tomorrow night and will see you there.



22 March 2022



Singleton Council Submission – Hunter Regional Plan 2041

I refer to the Draft Hunter Regional Plan 2041 (Draft Plan), exhibited from December 2021 to March 2022. Singleton Council has carefully considered the exhibited Draft and has developed this submission in response.

The key driver within the Draft Plan is based around the idea of an infrastructure first and place-based approach, utilsing the framework established in the Hunter Regional Plan 2036 (2036 Plan) for the Greater Newcastle Urban Development Program, a key deliverable under the 2036 Plan. As detailed in our submission, council has carefully considered the opportunities and constraints of such a model for Singleton and has used this to inform the submission in relation to the objectives and district planning outcomes.

Council notes that the Hunter Regional Plan provides strategic justification for a range of projects, policies and outcomes which are supported. Conversely, it is important that these projects, policies and outcomes don't result in unintended, constrictive outcomes that limit innovation and opportunity for Council. On that basis, Council supports the Draft Hunter Regional Plan and notes the following positive outcomes likely to be generated from its implementation:

- Greater diversification:
- Sequenced planning for new land uses and infrastructure;
- Economic self-determination and greater recognition and respect of traditional custodians:
- Net zero emissions as a guiding principle;
- 15-minute mixed use neighbourhood;
- An emphasis on infill approaches;
- A renewed focus on green infrastructure, public spaces and nature;
- Prioritisation of walking, cycling and public transport; and
- Reinforcing the importance of equity.

PART 1 – MAKING IT HAPPEN

Land Development and Infrastructure Development

Council supports the proposed approach in the Draft Plan where land and infrastructure development are considered together and delivered in parallel. Infrastructure analysis should include identification of the constraints, including areas already zoned but not developed, along with the reasons why. Development that is constrained by the cost of infrastructure must be identified and the barriers to such development removed, even when it may be difficult to do so.

The process for land and infrastructure development includes rezoning, development application and development. It should also include subdivision. It is often not until the subdivision stage that nuanced constraints are identified. This could include topography and stormwater drainage, road access locations and requirements and upgrades to water and sewer networks. These constraints are weighed up against the yield capacity of the site.

Infrastructure Constraints Outside the Metropolitan Area

Council acknowledges the importance of connecting infrastructure development with land use planning. Council recognised this relationship in its adopted Local Strategic Planning Statement (**LSPS**).

One of Council's LSPS objectives is to ensure Singleton is a well-planned, sustainable, accessible and safe community with vibrant places and spaces. Council will do this through its Planning Priority that places are well planned and maximise access to infrastructure and services. Council recognises one of the primary constraints associated with timely delivery of housing and employment land is the economic feasibility of infrastructure provision.

As population and economic growth occurs, so does the demand for new and enhanced assets and services, including both local and regional infrastructure. In terms of the local infrastructure for which Council is responsible, Council must effectively account for and manage the assets having regard to the long-term and cumulative effects of decisions. Council is responsible for maintenance and replacement of existing infrastructure as well as planning for new and augmented infrastructure.

Council's ability to fund provision, maintenance and renewal of infrastructure is constrained by 'rate-pegging', which means that the annual increase in rating revenue is established by an external body, namely the Independent Pricing and Regulatory Tribunal (IPART).

The Council's Long Term Financial Plan takes into account the abovementioned financial realities and focuses on allocating available funds in a manner which delivers the most effective, efficient and sustainable outcomes.

In terms of regional infrastructure, the LGA competes against the rest of the State and Hunter region for funding of regional infrastructure in the LGA. Whilst the Singleton LGA has capacity to increase its proportion of regional population growth and

contributes significantly to employment in the region, attracting investment towards local regional infrastructure can be difficult.

Councils within the Metropolitan Plan do not incur the same infrastructure costs and liabilities, where infrastructure is delivered through Hunter Water or Transport for NSW.

Infrastructure Planning Thresholds

The Draft Plan sets a framework for analysing infrastructure capacity and sequencing its implementation. Drawing on the experiences gained through the Urban Development Program in the Metropolitan Area, the Draft Plan proposes to extend this model to the entire Hunter Region.

Council supports an approach where infrastructure to support housing and employment growth is considered, planned and delivered in a structured manner. However, critical infrastructure provision, such as water and sewer, outside the metropolitan council areas falls to local council.

The Draft Plan proposes thresholds to enable infrastructure planning decisions to be prioritised at a regional scale. These thresholds are 2000 residential dwellings or, 200 hectares of employment land or, where two or more landholders are involved. These thresholds may work well in a metropolitan situation, but will not allow smaller scaled, yet equally important, infrastructure projects to take place in locations such as Singleton.

The thresholds include timing for delivery, where zoned and fully serviced sites are delivered in 0 to 5 years, zoned and part serviced are delivered in 5 to 10 years and unzoned delivered in greater than 10 years. Council considers sites that are zoned and fully serviced are already in the delivery pipeline, and development is subject primarily to market constraint. Those areas that are zoned and part serviced (which requires definition) should be triggered for investigation as soon as possible. Barriers to development that depend on infrastructure delivery should be identified, prioritised and scheduled to ensure delivery is consistent with demand.

Singleton has examples of residential development sites where the principal constraint to development is the provision of servicing infrastructure. These include Gowrie, Obanvale and Wattle Ponds, which in combination would deliver over 3,260 lots of residential development in Singleton. The infrastructure constraints are access, sewer and potable water supply – all of which are supplied by Council.

Similarly, Council's pipeline of employment land is equally constrained by infrastructure. Council has at Whittingham and McDougall's Hill an existing pipeline of employment land over 260 lots, constrained by access, sewer and potable water supply.

Without access to the regional scale UDP or significant risk sharing between developers and council, these developments are unlikely to progress. The thresholds identified in the Draft Plan coincide with the thresholds set in the Housing Acceleration Fund, a fund that provides grants to critical infrastructure projects that accelerate the delivery of housing and include transport, water, wastewater, drainage and community

infrastructure. Projects in the Hunter Region funded through this program are all located within the Lower Hunter Metropolitan Plan area. Given the thresholds, is unlikely that Singleton Council would be eligible for funding under this scheme.

Constraints and Opportunities

In Singleton, a significant pipeline of residential housing is currently zoned and available for development, both infill and greenfield. These growth areas also present constraints to future housing development. These constraints include changes implemented under the *Biodiversity Conservation Act 2016* as well as flood planning controls and planning for bushfire. Council has planned in its forward operational plan a program to quantify the impact and opportunities these constraints may have on existing identified growth areas. Until this analysis is completed, council will not have confidence that the predicted yield can be achieved. This may have impacts on future housing supply in the LGA.

Councils in regional/rural areas generally lack the resources needed to investigate these constraints. Financially, these strategic planning outcomes compete internally for funding, whilst there are no external funding opportunities to complete the work. The Draft Plan must recognise the need for investment in technical studies and strategic plans and provide the mechanism to support this work in a structured, transparent and well-planned manner.

An example of where such a change has impacted housing delivery is in the C4 zone in Sedgefield. When this area was re-zoned and subdivided the biodiversity obligations for minimising impacts was deferred to the development application stage. The consequence of this is that individual development applications are accounting for, at an individual level, the biodiversity consequences that, in today's environment, would be required at the rezoning stage.

Whilst constraints can be limiting for existing growth areas, these constraints may also present opportunities for as yet to be identified growth areas within the LGA. The Draft Plan must ensure councils are able to complete the required strategic investigations to ensure current identified growth areas will deliver expected outcomes, and if not, the door is not closed on alternative opportunities.

An Alternative Model for Council Infrastructure Providers

With unique infrastructure needs, it is essential that the Draft Plan recognises the need to assist councils with the delivery of infrastructure where there is insufficient rate base to economically deliver infrastructure ahead of development.

Council proposes that a separate, but similar, Urban Development Program should be established under the Draft Plan for councils outside the metropolitan area. Projects directed to the Non-Metro UDP should not be constrained by thresholds, but rather focus on growth areas that have been identified in a Local Strategic Planning Statement or Local Housing Strategy. The Non-Metro UDP should include consideration of zoned and un-zoned growth areas.

The Non-Metro UDP should consist of:

- Ausgrid
- Council land use planning, water, sewer and roads technical staff
- Health
- Education
- Transport for NSW
- Housing Institute of Australia
- Property Council of Australia
- Planning Institute of Australia
- Urban Development Institute of Australia
- Regional Australia Institute (or equivalent research organisation)
- Hunter Development Corporation

The Non-Metro UDP should focus on:

- 1. Greenfield development constraints in growth areas, zoned and part serviced followed by unzoned (noting that greenfield growth targets for the following are proposed under the Draft Plan: Central Hunter 60%, Upper Hunter 80%, Barrington 70% and Hinterland 40%).
- 2. Identification of the risks and benefits of development in greenfield sites.
- 3. A pipeline of housing and employment land supply with a focus on removing barriers and ensuring affordability and diversification.
- 4. A methodology to support councils in monitoring, reporting and tracking supply of both housing and employment land.
- 5. Opportunities and funding to accelerate supply of land for housing and employment.
- 6. Sequencing recommendations, which are limited to where infrastructure constraints are identified (for example cross LGA boundaries or where there is a competitive infrastructure environment).
- 7. Focus on supporting councils to implement recommendation 1, 2, 4, 7 and 8 of the Regional Housing Taskforce Recommendation Report.
- 8. Reporting on the implementation of the Regional Housing Taskforce Recommendations.

Council believes the above model would support the framework outlined in the plan, through:

- a. Ensuring growth is planned in the right areas, whilst adaptively managing in a changing constraint environment.
- b. Determining enabling infrastructure servicing and staging that is reflective of the strategic planning environment.
- c. Creating opportunities for diversification by including infrastructure required to service current and future employment land.
- d. Establishing opportunities for councils to understand the true cost of development and seek funding sources in a non-competitive environment.
- e. Developing place strategies that are bespoke to non-metro areas, acknowledging the support required to prepare these plans.

Regionally Significant Areas

Council supports the identification of regionally significant areas to prioritise the delivery of infrastructure and place planning. Regionally significant growth areas should include:

Urban Activation and Regionally Shaping **Unique Industry Gateways and Industry Opportunities Employment Precincts** Whittingham (intersection Bypasses at Singleton, Hunter Valley Viticulture Muswellbrook and Scone with New England and Equine Precincts Highway and Golden Highway) Branxton (noting the **Post Mining Land** difference in development between north and south of the Hunter Expressway)

These sites are regionally significant for the following reasons:

- 1. The intersection between the Golden Highway and the New England Highway is a critical corridor for road freight traffic. It connects the western and northern inland regions of NSW at one critical juncture.
- 2. Branxton has seen, and will continue to see, significant housing growth in the Huntlee development site, across both Cessnock and Singleton LGAs. To the north of Branxton, infrastructure constraints (water and sewer) allow for a different housing offering, with lifestyle living dominant. The township of Branxton sits in between these two development offerings. This complex housing situation is cut by the Hunter Expressway and railway.
- 3. Bypasses of significant town centres along the New England Highway will create opportunities for employment land growth and connectivity into vibrant town centres. These bypasses should be considered in the same way as the Hunter Expressway interchanges such that considered planning can be undertaken.
- 4. The Hunter Valley viticulture district should include both the viticulture and equine critical industry clusters as mapped in the Upper Hunter Strategic Land Use Plan.
- 5. Mining land must be considered regionally significant. These lands are large in terms of disturbance, post mining land use requirements and opportunities for diversification.

Place Delivery Group

Council supports the establishment of a Place Delivery Group that oversees the development of place plans for identified sites. The approach to the proposed Place Delivery Group would be suitable to new areas, however it's not clear how it would be applied to existing sites. Where proponents are required to fully fund place plans where thresholds are not met is likely to add to the existing high costs of housing in Singleton. A redefined, refocused Place Delivery Group outside the metropolitan area with a

focus on ensuring the outcomes of place planning do not add additional costs to council or developers.

PART 2: OBJECTIVES

Council is supportive of the objectives identified in the Draft Hunter Regional Plan. The following identifies opportunities for improvement on selected objectives along with suggested refinements to provide clarity to the Plan and enable Council to leverage outcomes.

Objective 1: Diversify Hunter's Mining, Energy and Industrial Capacity

Council recognises the importance of the mining industry to the region. When considering post mining land uses, regulatory settings need to provide for the time required to strategically plan for the future of post mining land, including allocating resources and responsibilities. Council believes mined owned land should be included as a Regionally Significant Unique Industry to provide the trigger and incentivise future land use planning outcomes. The relationship between rehabilitation and closure requirements and future investment should not be considered mutually exclusive.

Council supports the planning principles identified under Strategy 1.1, noting that when considering alternative land use is suitable, this should apply to any post mining land uses, including those already approved. It is also important to note that mined owned land generally consists of large land holdings of many small lots, often below the minimum lot size for development.

Council also supports the action proposed by the Department to investigate site compatibility for non-permissible land uses. The majority of mined owned land in the Singleton LGA is zoned RU1. There is an existing suite of permissible uses within this zone that are generally not aligned to the proposed final land uses currently approved. This disconnect between existing land use planning of post mined land and current opportunities for development is unlikely to be resolved without an analysis of the opportunities and constrains within the existing suite of permissible land uses. Any action to investigate site compatibility should include education and training for industry on land use planning principles.

Any investigation into site compatibility should consider development of a Mining Land Place Strategy, followed by site compatibility investigations that include removing the barriers to the creation of holdings capable of sustaining viable post mining land uses.

Objective 3: Create a 15-minute region made up of mixed, multi-modal, inclusive and vibrant local communities

Council is encouraged to see a transition towards sustainable neighbourhoods with reduced car dependency and an increased focus on health and wellbeing outcomes that crosses a number of Draft Plan objectives. Objective 3 (and Objective 4) relies heavily on the success of 'making it happen'. Council is optimistically supportive on the basis that the proposed alternative model for council infrastructure providers is adopted.

The creation of local neighbourhoods where most everyday needs are accessible within 15 minutes of walking or cycling opens opportunities for small villages to develop community focused hubs. Council notes that in many rural communities the achievement of some local needs within a short walk or bike ride is likely to be an aspiration goal, with services accessed by private vehicle. This approach opens opportunities to consider the way in which rural areas are strategically developed for both neighbourhood and residential development.

In that regard, Singleton has strategically located villages where future development opportunities could be enhanced by the 15-minute neighbourhood. With a decline in villages due to mining (Camberwell, Warkworth), council supports a re-focus on those that remain, such as Broke, Bulga and Jerrys Plains through a review of existing Village Master Plans.

Council supports the strategies identified under this objective with the following comments:

- The focus is on new areas of growth, the Draft Plan also needs to consider how a 15-minute neighbourhood could be considered for existing areas of infill development, and enable innovation, adaptation, retrofitting and re-design to cater for changing needs.
- Strategy 3.2 should include home businesses and changes of use.
- Strategy 3.3 should include in home care services and family day care services.
- The graphic depicting 30-minute centres should include specialist medical facilities/services and remove places of public worship.
- The graphic depicting 15-minute neighborhoods should include places of public worship.
- Strategy 3.4 should include a definition of 'complete' and 'incomplete' villages and recognise the differences between a town/village and a locality. Noting that Jerrys Plains is the first village that a traveller along the Golden Highway enters when driving from Newcastle/Sydney to Dubbo, it is the gateway to viticulture, equine, mining and agricultural activities of the Upper Hunter.
- Villages of Broke, Bulga and Jerrys Plains are dominated by rural residential development and limited by infrastructure servicing. The relationship in rural areas to a community facility such as a hall or place of worship cannot be underestimated as places that bring communities together. Developing strategies that ensure these values are maintained and enhanced is fundamental to the success of a 15-minute neighbourhood in rural locations.
- Strategy 3.6 should not be limited by the residential density necessary to support local or community serving commercial centres. Other factors that contribute to the livability of a location should also be considered where density limits are not met.
- Council recognises that the regional/rural nature of the Singleton LGA and its location within the Central Hunter Valley may create challenges for connection to key employment locations within 15 or 30-minute walking, cycling or public transport options. Local analysis of travel times from the Singleton township to these locations demonstrates that most mining, energy, and tourism roles in Wine Country would be over a 20 minute drive as these examples demonstrate:

- *Mining*: Singleton to Liddell Coal site is 24km which is a 20 min drive, and a 1 hour 20-minute cycle on a main road, the latter also providing safety concerns.
- **Energy**: Liddel Power Station is 44km which is a 38-minute drive and 2 hour cycle. It is a regionally significant growth area for employment and future industry within the region.

• Wineries:

- Singleton to Broke 26km, 20 mins drive, 1 hour and 20 minute cycle.
- o Singleton to Bulga 22km, 17 mins drive, 1 hour and 9 minute cycle.
- o Singleton to Mistletoe Lane 24km, 20 mins drive, 1 hour and 17 cycle.

Shift work, long hours and late nights are not always practical for public transport, and public transport options are limited.

- Strategy 3.9 should consider the aspiration for future village development creating community hubs with 15-minute communities is a consideration. However, given the location of significant regional growth areas and unique industry opportunities, the consideration of actions that support electric vehicles, charging stations, hydrogen public transport and other sustainable public transport options that allow for continued access to employment in regional/rural areas would be welcomed.
- The inclusion of the Singleton Bypass along the Hunter Expressway as a Regionally Shaping Gateway and Industry Precinct would allow for the development of 15minute communities connected to employment with the Singleton township particularly in key industries such as manufacturing, supply chain and emerging industries.

Objective 4: Plan for 'nimble neighbourhoods', diverse housing and sequenced development

Objective 4 relies heavily on the success of 'making it happen'. Council is optimistically supportive on the basis that the proposed alternative model for council infrastructure providers is adopted. Within this, potential future growth areas should also be considered where constraints to existing identify reduced development potential or prohibitive development potential. Constraining growth to only those areas where benchmarks are accommodated in existing urban and growth areas limits innovation and adaptation. In a changing climatic environment, flexibility must be provided where it is safe and feasible to do so, acknowledging this must be done in a risk based framework.

The Draft Plan lacks direction on how rural development decisions should be made to reflect a change in demand for lifestyle living, particularly in regional locations. Singleton has seen the impact of lost connections in communities impacted by mining, and the consequences of this on the rural fabric. The Draft Plan needs to consider how rural populations will be retained in existing communities, where it is sympathetic to do so. Flexibility for remote working, ability to downsize or redesign holdings for family retention and adapting to a changing environment requires the Plan to be flexible and supportive of innovative outcomes in rural communities, again, where it is appropriate to do so.

Singleton Council identified the importance of this through the adopted Planning Priority 2.3 and supporting Housing Strategy action in the Local Strategic Planning Statement.

Rural towns and villages provide a unique lifestyle choice. Singleton prides itself as a location of 'city convenience with a rural heartbeat'. Any future potential development in these locations should not be intended to accommodate significant growth, however, where planning is consistent with the district planning principles and can be supported by local infrastructure, the door should remain open through a Non-Metro UDP.

Council supports the strategies identified under this objective with the following comments:

- Council supports the idea of urban density measurement as a combination of both number of dwellings per hectare and number of residents and workers in an area. Urban density is influenced by many factors, including livability. These principle measures should be supported by other measures in unique areas, for example daily activity in areas of higher tourism and/or employment (eg mining and viticulture areas), time of day/week density can also be a useful measure to mixed-use areas.
- Strategy 4.2 and 4.3 should ensure careful consideration to the use of minimum lot sizing such that outcomes for infill development can be achieved. Increasing opportunities for manufactured/prefabricated houses, tiny house or 3D houses are encouraged, where it is appropriate, noting that these housing types can be restrained by servicing, such as sewer.
- Council acknowledges that the promotion of infill development under Strategy 4.4 could result in infrastructure savings and encourage development of services that promote walking, cycling and public transport. The Central Hunter proposed breakdown is 40% infill and 60% greenfield. This requires careful review, best achieved through the Non-Metro UDP, as constraints such as flooding, lot sizing and heritage conservation may impact the amount and rate of infill development available.
- Strategy 4.5 is a consideration for the Non-Metro UDP, where relevant principles in the Draft Plan and Local Housing Strategy provide justification as to the benefits for new or limitations to existing opportunities.
- Strategy 4.6 should include housing for younger population as well as older. These developments should be located within 15 minutes of agricultural and tourism activities to achieve the 15 minute neighbourhood concept. Rural workers accommodation should be encouraged to be innovative and adaptive in design to encourage both development and use. This should also support affordable housing for other industries as well as the visitor economy.
- Strategy 4.8 should be linked to the 15 minute neighborhood with linkages to ensure servicing can occur as close as possible to the need and ensure successful support for independent living in the community.
- Strategy 4.9 must recognise the importance of retaining dwellings on rural lands. These dwellings enable communities to remain intact and encourage the association of rural life with agriculture. Council has raised concerns about the

loss of dwelling entitlement that the Standard Instrument LEP has created under clause 4.2A. There is a need in the community to provide rural housing on lots below the minimum lot size, to enable families to remain intact on the one property as their family grows. This need should be considered in locations where it is appropriate, and servicing allows.

- The Singleton LGA consists of over 97,000 hectares of mine owned land. Over time, companies have demolished houses on lots below the minimum lot size, effectively extinguishing dwelling entitlement. The retention of communities in mining areas is critical to a post mining future. The Non-Metro UDP should consider this as part of its purview.

Objective 5: Green infrastructure, public spaces and improve the natural environment

Objective 5 relies heavily on the success of 'making it happen'. Council is optimistically supportive on the basis that the proposed alternative model for council infrastructure providers is adopted. The Non-Metro UDP would be well placed to prioritise and deliver the strategies under this objective.

Strategy 5.8 should apply to all development types as early in the assessment process as possible, so that the costs of mitigation or offsetting are built into the investment decision. Avoidance of impacts should be considered at the earliest stage, whilst mitigation should not be applied to 'mum and dad' dwelling applications.

Strategy 5.9 must include strategic consideration of local biodiversity polices and planning for all development types, including State significant development. Singleton has seen a significant decline in biodiversity across the valley floor, with connection between the Wollemi National Park and Barrington National Park effectively non-existent. Planning for biodiversity connections and corridors is critical to ensure no further loss of important biodiversity values in the LGA. Without a holistic and strategic approach there is a risk that local development will pay the price of a history of case by case planning for State significant developments as biodiversity values decline due to mining.

Objective 6: Reach net zero and increased resilience and sustainable infrastructure

Council supports proposals to increase resilience and move towards a net zero future. Resilience, net zero and sustainable infrastructure require capacity building at a local level as councils are charged with the responsibility to deliver. Place based risks, resilience programs and adaptation plans are needed for both new and existing areas of high risk.

Council supports the strategies identified under this objective with the following comments:

- Strategy 6.2 relies heavily on the success of 'making it happen'. Council is optimistically supportive on the basis that the proposed alternative model for council infrastructure providers is adopted.

- Strategy 6.3 requires an assessment of the capacity for councils to meet community water supply needs. Rainfall independent water sources requires review of water security decisions and how water is prioritized and used. Large water users should be encouraged to innovate away from fresh water use. New water users (such as hydrogen production facilities) must not place additional pressure on available water for domestic or agricultural users, or increase the cost to access water.
- Strategy 6.4 should extend to include mining and other emissions intensive developments. There is a perception that mining and energy intensive areas have livability implications which need to be addressed. Council has advocated for a cumulative impact assessment and particle characterization study for the Upper Hunter to provide a baseline against which future development is assessed.
- Strategy 6.5 should ensure future development of industry with the potential to impact air quality should include impacts to recreational areas in impact assessments, including cumulative impact assessments.
- Strategy 6.6 should consider the impact of an increase in click and collect services on parking availability, as well as the concept of 15 minute neighbourhood.

Objective 7: Plan for businesses and services at the heart of healthy, prosperous and innovative communities

Council supports plans for the diversity and vitality of the region's towns, villages and businesses. Developing increased vibrancy, shopping, cultural activities, and services supports livability, employment and visitor economy that are vital to economic prosperity and community wealth generation.

Strategies 7.1 and 7.2 will allow for the development of small precincts or nodes within strategic centres and villages that will support the development of and access for new businesses to develop and collaborate, allowing for attraction of innovation and capital rich entrepreneurs across the region while retaining character and scenic amenity in the vineyard and rural areas. This plan should keep the door open to tourism and visitor economy business development to allow for experience industry growth to ensure the region's tourism industry remains competitive into the future.

Access to nature and cultural tourism businesses are often more than 15 - 30 minutes from strategic centres, again raising the need for sustainable transport developments in the Hunter Valley and connectivity across the Hunter region.

Council is supportive of Strategy 7.3 and the 24 hour economy to support community livability and visitor economy, in locations as appropriate. This is required to encourage tourism and visitor economy growth, as the current offering is limited (by business capacity) to an extended weekend economy in tourism areas and limited availability of night time experiences on the weekend in the towns. The diversity of night-time activities across cultural, museums, attractions and experiences is supported.

Consideration should also be given to regional and local skills shortages and that this objective could be extended to include a plan for the support of developing local skills and attraction of skills to the region.

Objective 8: Build an interconnected and globally focused Hunter

Council is fully supportive of an interconnected and globally focused Hunter, as this is critical to the economic evolution and diversification that is required for the Hunter Region. Improving direct connection to global markets and exports in sustainable and emerging industries in addition to mining will be vital to future prosperity and regional employment.

- Consideration in Strategy 8.1 should be given to other industries such as visitor economy and tourism industry and the interconnectivity between the Airport and the Hunter Valley and other tourism locations in the region, to facilitate the growth of international tourism and align with aviation and port development proposals.
- Consideration to supply chain infrastructure and developments across the region and its interconnectivity to support other industries in addition to defence, such as agriculture and advanced manufacturing.
- Intra-connectivity in addition to inter-connectivity should be considered to ensure the needs of global industry development and the connection to emerging industries in the Central and Upper Hunter are reviewed. This could be included within the alternate non-metro UDP. This is also critical in the development of world class visitor destinations and tourism, for connection between Hunter regions, towns and villages.
- In addition to Newcastle airport, the potential for local airports including Cessnock, Scone and Maitland should be considered for intra and interconnectivity.

DISTRICT PLANNING AND GROWTH AREAS

Council acknowledges the boundaries associated with the district plans and notes that whilst these districts identify planning priorities, there is overlap across and between different districts. Council's comments identify where some of this overlap exists, and the impact of it on Singleton.

Hunter Expressway Global Corridor Growth Areas

Council made a submission to the exhibition of the Draft Hunter Expressway Strategy in March 2021. This submission identified a number of opportunities, particularly at the interface of the HEX and the New England Highway at Branxton and further west to Whittingham. Approximately 22,000 vehicles per day travel into, and through the Singleton LGA along the Hunter Expressway, New England Highway and Golden Highway. Development along the HEX will influence development along the New England Highway and Golden Highway. Planning for the HEX should not be done in isolation of the consequences on:

- The Singleton New England Highway Bypass and associated interchanges with the Singleton township and Putty Road;
- The function and capacity of the New England Highway between the Branxton interchange and the Singleton Township;
- The Golden Highway interchange with the New England Highway;
- Employment lands in the Singleton LGA; and
- Local catchment and riverine flooding.

DISTRICT PLANNING AND GROWTH AREAS

The outcome for the Central Hunter acknowledges Singleton's 'city convenience with rural heartbeat' vision. Singleton's proximity to Newcastle and Sydney, and its gateway position relative to the north-west along the Golden Highway, provides a unique connection point from metropolitan areas into the regions.

The Central Hunter region comprises a mix of viticulture, equine, defence, mining, water supply, natural heritage and Aboriginal cultural connections, as well as rural villages, scenic landscapes and highway bypasses. The values of the Central Hunter are represented across the Hinterland and Upper Hunter Precincts as well. Each Precinct should acknowledge the overlap that may occur, whilst the Draft Plan should document how this overlap would or could be managed.

The Hinterland district features, priorities and regionally significant viticulture growth areas are very similar to those around the Broke area. In particular, the Broke Fordwich region is an established and registered geographically indicated sub region for wine and viticulture, one of the only ones in the Hunter Valley wine region. It has viticultural and agricultural strategic land, as per the Hunter Valley wine regions, is identified as a tourism node investigation area within Singleton Council's strategic work and has visually significant landscape values of the Brokenback ridge and the Yengo and Wollemi National parks, as well as significant cultural and aboriginal sites. Consideration should be given to the extension of the Hinterland region to include the Broke and Milbrodale area. This would extend from the Hunter Valley vineyards and from Wollombi along Paynes Crossing Road and Wollombi Roads to Broke. This will allow for the development of tourism and connection of the viticultural, tourism and culturally significant areas of the Hunter Valley.

The District Planning Principles for the Central Hunter highlight the high priority that is required for the future planning of post mining land. As noted above, the relationship between mine closure and current opportunities for development requires acknowledgment and, in some cases, consideration of additional land uses or special zones capable of supporting developments in future or innovative industries.

Tourism in the vineyards should include Hermitage Road as a major tourism connection and potential future node. Landscape values in and around viticultural and equine villages need to ensure the rural experience is maintained and enhanced. Recognition of villages such as Jerrys Plains as key connectors should also be included.

Council proposes in its LHS to consider rezoning planning proposals for urban or lifestyle living areas but only where these will address identified housing gaps, provide

significant public benefit, and where the land complies with specific criteria. For this reason housing diversity needs to include investigation of future growth areas in both Sedgfield and Branxton (north of the Hunter Expressway). Rural residential and residential urban release areas only in locations where existing supply cannot be met is a limiting outcome that is likely to further constrain diversity and affordability. The Non-Metro UDP should consider and determine whether new areas of development are appropriate, when constraints to existing are considered.

Council's draft Local Housing Strategy (LHS) acknowledges the amount of land available for urban and lifestyle living purposes; however a proposed action in the LHS will be to assess the feasibility of those areas to be developed under current legislation and requirements due to site and environmental constraints. This assessment will require biodiversity and Aboriginal heritage mapping at a minimum and so cannot take place until this preparatory mapping is complete.

A globally connected Central Hunter should acknowledge the current constraints to employment land and the need to consider existing industrial capacity, future industrial capacity through mine owned land, the consequences of bypass construction on access to major road transport networks at the HEX interchange at Branxton, the Golden Highway/New England Highway intersection, the Putty Road offramp, the Gowrie off-ramp and the off-ramp at McDougall's Hill in Singleton. All are opportunities for investigation for future employment land.

Council supports the development of a health care precinct catering to all stages of life, and recognised the importance of this as Theme 1 in its adopted Local Strategic Planning Statement (LSPS). Additionally, the planning principles that support green infrastructure have equally been recognised in the LSPS.

Council notes that Figure 22 does not include the full mapped viticulture critical industry cluster that encompasses the Broke Fordwich and Jerrys Plains regions. The viticulture critical industry cluster should include that mapped under the Upper Hunter Strategic Regional Land Use Plan 2012.

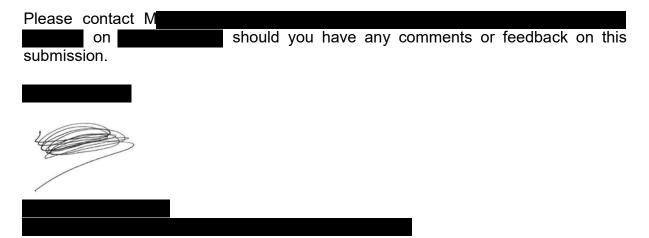
APPENDIX A

Appendix A does not include any significant employment land outside the metropolitan areas. Consideration of employment land in the Upper Hunter is critical to ensuring a smooth pathway to diversification. Significant employment land outside the metropolitan areas includes Liddell and Bayswater Power Station, Whittingham Industrial Estate, McDougall's Hill and Mined Land. These areas should be recognised as such in the Plan.

CONCLUSION

In conclusion, Council would like to thank the Department for the opportunity to comment on the Draft Hunter Regional Plan. There is a fundamental shift in the way in which the Plan has been structured and will be delivered. Council is supportive of an approach that provides transparency to the community and creates opportunities for Council to progress its priorities in the Local Strategic Planning Statement.

As noted above, the success of the Plan relies on an effective 'making it happen' outcome. Council has provided some comments on how a modified approach to cater for the unique circumstances that face non-metropolitan councils could be applied to support investigation and investment into the region.





DUNGOG SHIRE COUNCIL

All Communications to be addressed to:

The General Manager Dungog Shire Council

PO Box 95

DUNGOG NSW 2420

Telephone:

(02) 4995 7777 (02) 4995 7750

Facsimile: Email:

shirecouncil@dungog.nsw.gov.au

Website:

www.dungog.nsw.gov.au

ABN

62 610 350 056

Ref: EF08/172, 21/33383

21 March 2022

NSW Department of Planning and Environment PO BOX 1226 NEWCASTLE NSW 2300

Attention:

Dear I

RE: DRAFT HUNTER REGIONAL PLAN 2041

Thank you for the opportunity to comment on the draft Hunter Regional Plan 2041. It is acknowledged that submissions were due by 4 March 2022. However, given that Dungog Councilors were not briefed by the Department until 7 March 2022, it is understood that this late submission will be accepted as previously discussed.

The submission was endorsed by Dungog Shire Council at the Ordinary Meeting on 16 March 2022. I trust that the attached comments will be of assistance to you and thank you again for the opportunity to comment on the draft Plan.

Should you have any enquiries regarding Council's submission, please contact





DUNGOG SHIRE COUNCIL

SUBMISSION TO DRAFT HUNTER REGIONAL PLAN 2041

MARCH 2022

Thank you for the opportunity to comment on the draft Hunter Regional Plan 2041 (draft Plan). The submission has been endorsed by Dungog Shire Council at the ordinary meeting of 16 March 2022.

District Planning

Dungog Local Government Area is proposed to be split between the Hinterland and Barrington Planning Districts as identified in the draft Plan. The town/villages within and around Clarence Town and Paterson are specifically listed as being within the Hinterland Planning District. Council is generally supportive of the planning priorities identified for the Hinterland, particularly in relation to rural villages and housing diversity, rural enterprise and diversification and green infrastructure and quality public spaces.

The draft Plan notes that Dungog Council is currently undertaking structure planning for Clarence Town. The commencement of the Clarence Town Structure Plan is currently identified in Council's Operational Plan and an initial project brief has been drafted. However, current resourcing challenges have delayed this project from progressing further than the initial stages. For Council to be able to complete the Clarence Town Structure Plan and plan for the future growth of Clarence Town, direct assistance from the State Government will be required. Council would be interested to work with the Department in terms of exploring any opportunities for funding, grants or resources to assist in this project.

It is also Council's view that consideration should be given to identifying Clarence Town as a growth area within the Hunter. Clarence Town is already experiencing growth for those seeking lifestyle development within reasonable commuting distance to employment and retail centres. As it is within commuting distance to the Williamstown Special Activation Precinct, it is anticipated that demand for land within Clarence Town land will continue to grow. For Clarence Town to effectively grow and achieve the objectives of the Regional Plan, it will require the structure plan to be endorsed and supported by Council and the NSW Government based on consideration of key infrastructure requirements including, but not limited to:

- Effective road and transport infrastructure to ensure connection to the employment and strategic centres in Greater Newcastle and the Williamtown Special Activation Precinct. Any associated consideration of these transport needs should also be reflected in the reviews of the Hunter Regional Transport Plan;
- The provision of a reticulated sewerage system to assist in managing growth and the quality of water in the Williams River. The Williams River provides critical and

sustainable water supply for Greater Newcastle and the Hunter region and as must be protected in terms of its water quality.

Paterson is identified as a potential future growth area within Figure 21 of the draft Plan. From the briefing that Council received from the Department, it is understood that this refers to a long-term timeframe that is not within the 5-year scope of the current Plan, despite Paterson currently experiencing growth due to its proximity to Maitland. Similar to the proposed growth of Clarence Town, for Paterson to sustainably achieve future growth, it will require structure planning approaches and additional infrastructure for improved transport connections (road and rail) as well as the provision of a reticulated sewerage system.

The Barrington Planning District encompasses the majority of land within Dungog LGA, including Dungog township. The planning priorities include housing diversity and sequenced development, rural enterprise and the agricultural sector, tourism gateways and scenic landscapes, rural towns and villages and health care precincts. Other than encouraging tourism as a gateway to the Barrington Tops National Park and the more recent visitor economy linked to mountain biking around Dungog, it does not appear that Dungog aligns well with the other planning priorities for this precinct.

The draft Plan identifies that medium density development should be encouraged close to Dungog and that opportunities for the aging population including retirement living should be promoted. In terms of housing diversity, the planning controls for Dungog currently permit a range of housing options and do not include minimum lot sizes nor a floor space ratio for land zoned R1 General Residential. Despite this, there has been limited uptake in housing densities or housing diversity, including retirement living.

Dungog is a strategic and administrative centre servicing residents, business and tourism across the Shire and wider region, has important transport connections that will require strong infrastructure investment. The Newcastle suburban rail network terminates at Dungog Railway Station and provides a critical link to Maitland and Greater Newcastle including the Newcastle CBD. This facilitates access to schools and specialized employment centres via public transport and investing in improvements to this transport infrastructure and services supports the objectives of the Plan and will support potential uptake for housing in Dungog close to the services it provides. Council is helping to drive investment in this area by adopting a Strategic Property Program which seeks to invest in property for the benefit of returns to the Council and community. One of the objectives is to look at residential development within the Dungog township to leverage good transport connections to the wider region, the benefits of housing and lifestyle choices and good proximity to local services.

In terms of the agricultural sector, Dungog Council remains committed to finalising the Rural Lands Strategy and is concerned that the Hunter Regional Plan may pre-empt or influence the outcome of that process. Public exhibition and community consultation has not yet been completed for the Dungog Rural Lands Strategy and it is important that feedback from that process can be considered and implemented by Council, where appropriate, without being unnecessarily restricted by the Hunter Regional Plan.

The discussion on rural towns and villages makes reference to Clarence Town, although Clarence Town has been identified as being part of the Hinterland planning precinct, not the Barrington planning precinct. The section on health care precincts also fails to recognise the

existing hospital and services located at Dungog. The clustering of allied health around other health facilities at Gloucester and Wingham has been identified as supporting the aging population although Dungog has been overlooked.

Drinking Water Catchment

Council is of the view that the draft Plan does not adequately address the importance that Dungog LGA has in supplying approximately 90% of the potable water for the Lower Hunter (with the possibility of providing additional supplies to the Upper Hunter and Central Coast). Council is committed to protecting its water resources and in addition to controls in the Dungog Local Environmental Plan, implements a Development Assessment Framework for the assessment of on-site sewage management systems within the Shire and follows Hunter Water advice for development within the Williams River drinking water catchment. However, given that the majority of Dungog LGA is located within drinking water catchments, it is important that this does not unreasonably restrict future development or investment within Dungog LGA. It is important that relevant authorities are involved in addressing the conflict in protecting the Hunter's potable water supply and promoting the growth of Dungog LGA. Key items for consideration include the extension of reticulated sewerage systems to the R5 Large Lot Residential zoned land surrounding Dungog and Clarence Town and the water quality within the Williams River and the Seaham weir pool within the Port Stephens LGA.

Objectives of the draft Hunter Regional Plan 2041

In terms of the broader objectives of the draft Plan, the following comments are provided for consideration:

 Objective 3 - Create a 15 minute region made up of mixed, multi-modal, inclusive and vibrant local communities

Dungog LGA contains a number of villages/towns including Dungog, Clarence Town, Paterson, Vacy and Gresford/East Gresford. This places Dungog LGA in a good position in terms of achieving a '15 minute region' provided that the towns and villages within Dungog LGA are identified as being within the rural context. Paterson and Clarence Town are also capable of achieving the concept of a 30-minute connected community via car to more specialised needs in larger centres such as Raymond Terrace and Maitland. However, this is not possible for other areas of the LGA such a Dungog and Gresford/East Gresford. A level of flexibility should be incorporated into the requirements for the 15- minute region and 30-minute connected communities.

The implications of creating a 15 minute region or 30 minute connected community has direct infrastructure implications to enable that objective to be realistically achieved.

To achieve the objective these communities must be supported in future planning by the NSW Government and in turn, infrastructure priorities to enable that to be achieved must also be identified (in part through the structure planning process) and funded by the NSW Government in partnership with local government to ensure delivery. Without supported funding and delivery this objective will be difficult to achieve. Paterson and Clarence Town in particular, are communities which are highly connected to the Greater Newcastle Metropolitan area and should be considered in the infrastructure planning needs in support of the growth of Greater Newcastle. Other communities such as Gresford and East Gresford and rural communities to

the west of the shire are connected to mining in the Singleton and Muswellbrook areas. These connections are supported by journey to work data published by the Australian Bureau of Statistics (ABS) which shows over 50% of the working population travels to work in adjoining centres *outside the shire* each day – transport infrastructure and connectivity is critical to the sustainability of access to employment and the ongoing sustainability of the Shire.

• Objective 4 - Plan for "Nimble Neighbourhoods", diverse housing and sequenced development

Strategy 4.1 of the draft Plan identifies that at a minimum development proposals will reflect an urban density of 50-75 dwellings per hectare of developable land. Such urban density is unrealistic and not supported in rural areas such as Dungog LGA. It is requested that further clarity or flexibility is provided within the Plan to cater for rural areas.

Strategy 4.4 of the draft Plan identifies benchmarks for infill and greenfield growth based on the seven planning districts. Dungog LGA is split into the Hinterland (Paterson, Clarence Town) and Barrington (Dungog, Vacy and Gresford/East Gresford) districts. For the Hinterland district, the benchmark is 60% infill development and 40% greenfield development. For the Barrington district, it is 30% infill development and 70% greenfield. The lack of a reticulated sewer system to Paterson is a major restriction to achieving infill development in that area. The majority of growth within Dungog LGA is through large lot residential subdivision rather than infill development and therefore it is unlikely that these benchmarks would be met within the next 5 years.

 Objective 5: Increase green infrastructure and quality public spaces and improve the natural environment

Page 44 of the draft plan incorrectly identifies the village of Paterson as being within a drinking water catchment.

Objective 8: Build an inter-connected and globally focused Hunter

Council supports this objective strongly. Dungog Shire Council is one of the 10 Councils of the Hunter Joint Organisation and supports the position taken in the draft submission of the Hunter Joint Organisation.

It should be noted for housekeeping that Figure 5 on page 57 of the strategy incorrectly locates. The Bucketts Way to the west of Dungog.

Governance Arrangements

Council supports a strong governance model that will ensure a whole of government approach to realising the objectives and delivery of the Plan. We strongly support that state agencies be held accountable for delivery of those areas within their responsibility, including in those other NSW Government Plans which will effectively plan and deliver the infrastructure to support the Plan (e.g. the Hunter Regional Transport Plan) and that the governance model be endorsed by the NSW Cabinet as a priority.

Request for direct support from the NSW Government to deliver the Plan

Council is willing to "play our part" and be accountable for those areas within our area of responsibility, however, we make a very direct appeal for support from the NSW Government for resourcing to assist us in achieving the objectives of the Plan. In particular we seek support for either grant funding (such as Planning reform funding or the like) or direct assistance with technical staffing or resources to deliver the Clarence Town Structure Plan in particular and any future planning work required across the Shire to support delivery of the Regional Plan and to facilitate sustainable growth.

I trust that the above comments will be of assistance to you and thank you again for the opportunity to comment on the draft Plan. Should you have any enquiries regarding the above comments, please contact.

I would like to provide further input to the Draft Hunter Regional Plan 2041 (the plan) because of the importance of this plan.

Hopefully, it will be included because it has arrived before the start of the first DPIE business day after the extension was due.

Background

I provided an initial short response on the 5th March to the plan due to interactive hub access and other challenges, and was granted an extension of time to 18/3/22. Further computer crashes meant I only had time for another short response, but still did not cover some important issues. So I have summarised my prior inputs below in the Appendix.

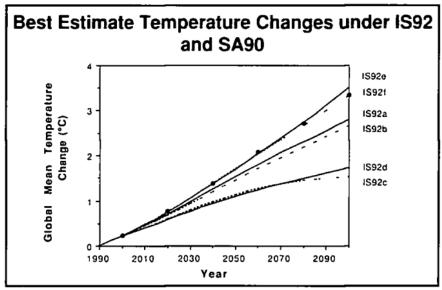
20/3/22 Response

One of the possible major issues with the plan is the seeming underestimation of the impact of climate change on the region in the climate change summary box on page 50 because:

- It has no baseline year (it was 2000)
- It uses the final year of each of the 20 year climate average ranges as the "climate" e.g. 2039, instead of the middle year of 2030
- The projections used in the NARCLIM studies (NARCliM, 2014) were for AR4, and the most appropriate
 extreme scenario was not used.

The first 2 points are easily updated, but the last point requires clarification.

The projections for mean surface level temperature in the 1992 IPCC report showed the following scenarios in Figure 1. However, the observed temperatures in the latest 2021-22 AR6 IPCC report show temperatures in the last 30 years at the upper end of the scenarios projected in 1992.



Estimates of global mean temperature change for the IPCC 1992 scenarios (IS92a-f) assuming the IPCC—best estimate; climate sensitivity. The effects of sulphate acrosol and ozone depletion have not been taken into account. SA90 is represented by solid circles.

Figure 1 - 1992 IPPC scenario projections (IPCC Synthesis Report, 1992, p. 19)

b) Change in global surface temperature (annual average) as **observed** and simulated using **human & natural** and **only natural** factors (both 1850-2020)

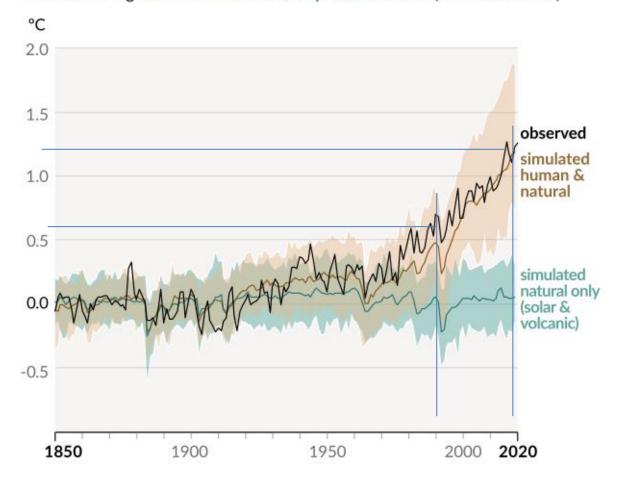


Figure 2 - 2021 IPPC scenario projections (Masson-Delmotte et al., 2021, p. SPM-7)

So relying on the DPIE Hunter Projections (NARCliM, 2014) for the projections and using a scenario which was not the most extreme for the Hunter climate change projections underestimates the risk to the Hunter, particularly around 2070.

The two main implications re adaptation are that

- Bushfire seasons are becoming very difficult to control when El Nino weather patterns that happen around
 every 5 years of so are overlaid with climate change temperature increases. So special adaptation is required
 particularly in rural bushfire prone areas in the Hunter
- Flooding will recur again every 5 years or so with the regular La Nina weather pattern, overlaid with the additional moisture content in the air (7% for each degree of temperature rise) and energy with increased temperature

Hunter Sustainability plans which include planning with a view to reach net zero emissions were put forward by Beyond Zero Emissions in a Case Study in its submission to the Inquiry into "Sustainability of energy supply and resources in NSW". See https://www.parliament.nsw.gov.au/ladocs/submissions/65526/Submission%20-%20184.pdf

Other Adaptation

Critical infrastructure at low elevation coastal zones also should be relocated or renovated for flooding e.g. railways, national and regional roads, and health buildings etc.

One main area of high employment that can have tremendous returns on investment are to retrofit housing that is of a poor performance level. This would help future-proof the Hunter against heatwaves, which are responsible for the most deaths in Australia of all natural disasters. It has other co-benefits such as reducing peak energy demand and extending the life of existing housing.

Yours sincerely,

- IPCC Synthesis Report. (1992). Climate Change: The 1990 and 1992 IPCC Assessments: Overview and Policymaker Summaries. https://www.ipcc.ch/report/ar1/syr/
- Masson-Delmotte, V., Zhai, P., Pirani, A., Connors, S. L., Péan, C., Berger, S., Caud, N., Chen, Y., Goldfarb, L., Gomis, M. I., Huang, M., Leitzell, K., Lonnoy, E., Matthews, J. B. R., Maycock, T. K., Waterfield, T., Yelekçi, Ö., Yu, R., & Zhou, B. (Eds.). (2021). Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change. Cambridge University Press. https://www.ipcc.ch/report/sixth-assessment-report-working-group-i/
- NARCliM. (2014). NARCLiM climate projections for your region.

 https://climatechange.environment.nsw.gov.au/Climate-projections-for-NSW/Climate-projections-for-your-region

5/3/22 Response

I have found this plan to be very innovative, but have not been able to access the interactive hub site tonight (the last night) to provide my full feedback, getting the error message "This site is protected" when I login. Furthermore, my region has been affected by flooding and I would appreciate another 7-14 days to comment if possible.

I made one comment on the hub re 2 forms of enabling low cost housing via Community Land Trusts and SEPP 15 developments.

Another important aspect is to guard against the immediate effects that are being felt about climate change already (Australia and NSW has increased its temperature 1.4 degrees C since 1850 and is in a particularly vulnerable position already for bushfires, heatwaves, flooding, coastal erosion and droughts). There is much that can be done from an adaptation point of view that I feel is not captured in this plan:

- . while infill development assists population increase by using existing infrastructure, care must be taken not to encroach on green spaces to combat Urban Heat Islands
- . proper retrofitting of existing houses can lower the number of heatwave deaths
- . careful management of development in floodplains and protection or retreat of housing from Low Elevation Coastal Zones (LECZs)

These are the only comments I can provide at the moment, but would appreciate a further discussion, having been the main author of the Beyond Zero Emissions submission into the NSW Energy and Resources Sustainability Inquiry and also the author of the BZE book "Cooling Your Home".

18/3/22 Response

So I have put some bullet points below after

- · considering plan in more detail, and
- Reading the Greater Newcastle Urban Development Program, and the Greater Newcastle Metropolitan Plan.

Page 20. The Orica plant processing Ammonia (which can be made with green Hydrogen and is a tremendous opportunity for the region) appears to be missing in the Region Shaping Gateways column of the Greater Newcastle Metro row.

Page 23. Industry Circular Economy Precincts can be established for types of industries which can reuse waste heat, waste water, those that can electrify their processes and reuse the waste of one organisation as the raw materials for another e.g. car tyres to make green steel.

Page 26 - Net zero target should be more ambitious given the University, City of Newcastle achievements of fully renewable energy goals and the low carbon initiatives in the John Hunter Hospital refurbishment.

From:

To:

DPE PSVC Hunter Mailbox

Subject: RE: Webform submission from: Draft Hunter Regional Plan 2041 - Final submission

Date: Sunday, 20 March 2022 9:41:30 PM

Attachments: <u>image003.png</u>

Importance: High

Dear Sir/Madam,

I have been able to include more information now in my final response (attached) to the impressive Draft Hunter Regional Plan 2041 and related documentation.

Thank you for the opportunity to comment, after I spent many volunteer years working on plans for a zero carbon Hunter with Beyond Zero Emissions (BZE).

Kind regards,

From:

Sent: Saturday, March 19, 2022 12:00:38 AM

To: DPE PSVC Hunter Mailbox < Hunter@planning.nsw.gov.au>

Subject: Re: Webform submission from: Draft Hunter Regional Plan 2041

Hi,

I have had some computer failures this week, but managed to read the plan, and the 2 associated Newcastle Urban Program and Metro Plan.

I have attached some thoughts, and will attempt to send more input by Monday morning, assuming this will be ok.



On 11/03/2022 4:20 pm, DPE PSVC Hunter Mailbox wrote:

Good Afternoon

Thank you for your email and our apology for the delay in responding.

I have discussed with our manager regarding the below request, and the extension

for late submission has been granted until Friday, 18th March 2022.

Please provide your submission to our mailbox at $\underline{\text{Hunter@planning.nsw.gov.au}}.$

We look forward to receiving your submission.

Kind Regards,



Planning and Assessment | Department of Planning and Environment www.dpie.nsw.gov.au



The Department of Planning and Environment acknowledges that it stands on Aboriginal land.

We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

From: noreply@feedback.planningportal.nsw.gov.au <noreply@feedback.planningportal.nsw.gov.au>

Sent: Friday, 4 March 2022 11:59 PM

To: DPE PSVC Hunter Mailbox < <u>Hunter@planning.nsw.gov.au</u>>

Subject: HPE CM: Webform submission from: Draft Hunter Regional Plan 2041

Submitted on Fri, 04/03/2022 - 23:59

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name



I would like my submission to remain confidential

Info

Email

Suburb/Town & Postcode

Narara

Please provide your view on the project

I am just providing comments

Submission

Dear Dr

I have found this plan to be very innovative, but have not been able to access the interactive hub site tonight (the last night) to provide my full feedback, getting the error message "This site is protected" when I login. Furthermore, my region has been affected by flooding and I would appreciate another 7-14 days to comment if possible.

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These are the only comments I can provide at the moment, but would appreciate a further discussion, having been the main author of the Beyond Zero Emissions submission into the NSW Energy and Resources Sustainability Inquiry and also the author of the BZE book "Cooling Your Home".

Kind regards,

I agree to the above statement

Yes



8 March 2022

Our Ref: 108/173

Regional Director, Regional Growth
Department of Planning and Environment

Dear Sir,

Re: Maitland City Council Submission – Draft Hunter Regional Plan 2041

Thank you for the opportunity to comment on the draft Hunter Regional Plan 2041. This submission has been formally endorsed by the elected Maitland Council.

Maitland welcomes the revised draft Hunter Regional Plan 2041 (draft Regional Plan) and commends the Department on the collaborative approach taken in developing this key strategic document for the Hunter Region. Council has reviewed the draft Regional Plan and is generally supportive of the strategy. However, there are key issues specific to Maitland that require consideration by DPE that have been outlined below.

Council recognises and supports the following:

- Adoption of the United Nations Sustainable Development goals as a key driver of the draft Regional Plan.
- Prioritisation of active transport.
- Increased focus on generating employment diversification.
- Establishment of net zero as a guiding planning principle.
- Creation of 15-minute neighbourhoods.
- Continued emphasis on infill over greenfield residential development.
- Economic self-determination of traditional custodians.

Importantly, the place-based, infrastructure first approach outlined in the draft Regional Plan is a positive shift in government policy. However, as discussed below, further consideration is required for significant development precincts that are zoned for urban purposes and are experiencing rapid growth without supporting infrastructure. Council would welcome a discussion with the Department on how key growth areas, including the Maitland Western Precinct and Central Maitland, can benefit from increased recognition and consideration for additional infrastructure provision and planning within the draft Regional Plan.

Council staff are available to discuss the issues raised below with the Department at your convenience.

1. Infrastructure First and Place-Based Approach to Development

The infrastructure first and place-based approach to development that ensures a coordinated approach to land use and infrastructure planning is supported. However, there needs to be increased assistance for infrastructure provision to existing high growth areas such as Maitland that are experiencing significant negative impacts due to the lack of coordinated infrastructure planning. Council recommends that an infrastructure audit and gap analysis be undertaken for areas that are currently experiencing significant growth in the Maitland area such as Lochinvar and Thornton.

Further consideration is also required to ensure that the Placed-Based approach applies to areas identified within Local Strategic Planning Statements and other supporting council strategies for intensification through infill development. Whilst the infrastructure issues associated with greenfield development differ from infill, intensification in existing urban areas at the levels envisaged in the draft Regional Plan can generate significant demand for additional infrastructure.

Whilst Council supports the Place-Based approach, there appears to be a disparity in the level of detail provided within Districts. Some identified areas appear to have more refined, fine grain detail, where other areas the level of detail is at a much higher, strategic level. This disparity can create a perceived inequity in approach, favouring some areas to others. As a high-level planning strategy, Council believes the Regional Plan should maintain a consistent level of detail.

Council recognises that the Urban Development Committee has been an effective mechanism to monitor land release in greenfield areas. However, further resourcing and assistance to councils will be required to facilitate the revised objectives of the Committee to include issues associated with infill housing and employment lands.

2. Sequencing of Urban Release Areas

The shift to the prioritisation of sequencing of urban release areas is welcomed. However, as discussed earlier in this submission, areas where development has already occurred that have an undersupply of infrastructure must be prioritised over new urban release areas. The proposed infrastructure assessment framework must include high growth areas such as Thornton and Lochinvar prior to the consideration of other significant urban land release areas.

3. Creation of 15-minute Neighbourhoods

Whilst Council supports in principle the creation of 15-minute, mixed use, vibrant neighbourhoods supported by multi-modal transport options, this approach should be viewed in the context of the proposed reforms to development contributions. To support communities in dense areas, quality and functional infrastructure such as

passive and active open space, active transport, and community facilities are essential to support liveable and vibrant communities.

The significantly higher cost of land acquisition due to fragmentation and market values, and appropriate infrastructure designed for intensive use must be adequately funded. Council is concerned that if the current development contribution reforms are implemented as exhibited, our ability to support the desired intensification with supporting infrastructure will be drastically reduced. Council urges the Department to consider the implications of the proposed contributions reform and the ability for the desired outcomes within the draft Regional Plan to be achieved.

4. Density Requirements

The draft Regional Plan seeks to implement a minimum density in urban areas of 50 to 75 dwellings per hectare of developable land. Whilst Council supports increased densities in urban areas, the blanket approach taken does not take into consideration the desired current and future character of existing neighbourhoods and centres. To achieve this target, planning controls would need to be homogenised and would have a significant impact on the character of existing areas.

The lack of a targeted approach to density is likely to create or exacerbate infrastructure issues. An infrastructure audit (referenced above) of existing areas would assist in identifying appropriate areas for increased densities and provide guidance on the supporting or catalytic infrastructure requirements.

Council suggests that a more appropriate approach is for the Region Plan to include criteria for areas that would be suitable for such density and require councils to identify specific areas within their respective LSPS.

5. Maitland Western Precinct

The Maitland Western Precinct was identified as a Regional Priority within the Hunter Regional Plan 2036 with a strong focus on delivering housing for the region. Whilst some development has commenced in this precinct, additional land use and infrastructure planning is required to ensure the area reaches its full economic potential.

The Maitland Western Precinct contains a mixture of urban release areas, existing residential areas with intensification opportunities, and significant areas of industrial and bulky goods land uses. The Precinct stretches from Rutherford, Aberglasslyn, and Telarah in the east, and includes Anambah, Farley, and Lochinvar to the west. The Precinct includes critical infrastructure including the New England Highway, Hunter Expressway, Rutherford Aerodrome, and Telarah and Lochinvar train stations. This infrastructure represents a significant private and public investment, which is currently being underutilised.

The Rutherford Employment Precinct is a regionally significant employment cluster with over 4,300 jobs with notable exposure to the mining and power generation industries. As the Hunter Region transitions away from traditional mining and power generation sectors, careful consideration and planning to the transition of this critical employment precinct will be required.

The Maitland Local Strategic Planning Statement 2041+ identifies the Western Precinct has the potential to accommodate an additional 17,700 residents, and substantial additional jobs across multiple employment areas. Council considers that there are likely to be additional opportunities for both intensification and expansion of the existing urban release areas, following detailed land use and infrastructure planning.

Council firmly believes that the inclusion of the Maitland Western Precinct as a District Priority is consistent with the objectives of the Hunter Region Plan, and will assist in coordinating planning and infrastructure delivery, generating significant housing, economic, and employment opportunities.

6. Central Maitland

Central Maitland is the Hunter Region's second largest centre-based employment precinct with over 5,300 jobs. This historic precinct includes significant private and public investment, providing a mix of civic, retail, professional, educational, and residential uses. In recent years the precinct has undergone significant transformation with the completion of The Levee and The Riverlink building, Maitland Regional Art Gallery, Central Maitland transport interchange, No.1 Sport Ground, and the new Maitland Council Administration building currently under construction.

A key constraint to the realisation of the economic and housing potential of Central Maitland is the risk of flooding from the Hunter River. Resolving a flood evacuation route will support the residential and employment intensification required to sustain the centre's growth.

Council requests that the Department consider the inclusion of Central Maitland as a Hunter Regional Plan Regionally Significant Growth Area with a focus on urban activation to facilitate coordinated planning through the proposed Place Strategy process.

7. Integration of Land and Transport Planning

It's Council's understanding that the draft Regional Plan was prepared concurrently with the draft Hunter Transport Plan. However, public exhibition of the transport plan has not occurred. Council is disappointed that exhibition of these two critical documents did not occur concurrently.

The lack of information on transport planning makes it difficult for a proper assessment of the draft Regional Plan to occur. In particular, the inclusion of strategic direction on

bolstering passenger rail services from Maitland to Singleton is considered to have significant benefits and strategic implications for the region and would influence outcomes and priorities within the Regional Plan. In addition, the electrification of the Maitland Rail Line would bring significant environmental and amenity benefits, and would likely lead to an increase in usage of the passenger service. This is especially important when viewed in conjunction with an increased density around key nodes.

8. Greater Newcastle and Hinterland District Boundary

The draft Regional Plan proposes to split the urban area of Maitland between the Greater Newcastle District and the Hinterland. The existing urban areas of Raworth, Morpeth, and Largs have been placed within the Hinterland District. Councils' preference is to include the existing and planned urban areas of Maitland within the Greater Newcastle District, with rural areas north of the Hunter River included within the Hinterland District. This approach is consistent with Council's Local Strategic Planning Statement 2041+, and the direction taken within the rural and local housing strategies currently under preparation.

Council has prepared a map (Attachment 1) indicating our preferred boundary between the two districts.

9. HEX Corridor Growth Areas

Council recognises the importance of protecting the corridor surrounding the Hunter Expressway from non-compatible uses and securing land for the associated employment uses in the long term. However, Council is concerned with the quantum of land identified within the Allandale and Branxton Interchange to the west of Lochinvar.

As identified above, the Lochinvar Urban Release Area (URA) is currently experiencing significant growth. The Lochinvar URA is well located along the New England Highway with underutilised public transport infrastructure in the south of the precinct. Currently the proposed boundary of the Allandale and Branxton Interchange abuts the southwestern edge of the Lochinvar URA. The quantum of land within the identified area is significant (approximately 9,400 hectares). Council is concerned that the identification of this area was not subject to an economic study to show future demand for freight and logistics.

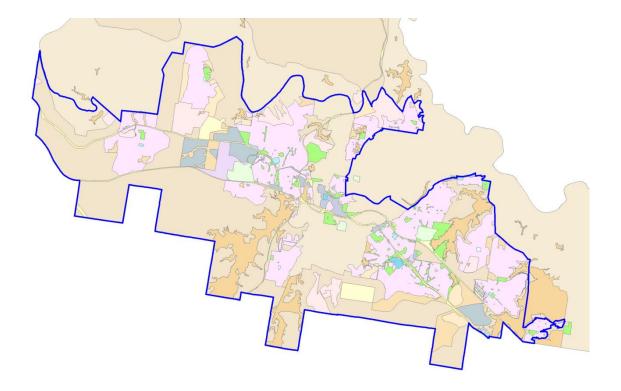
Council's preference is that the boundary of the Allandale Interchange be determined by an economic study looking at future demand, and be moved further to the west, to ensure it does not unnecessarily impede on any future expansion to the Lochinvar URA.

10. Farley Urban Release Area

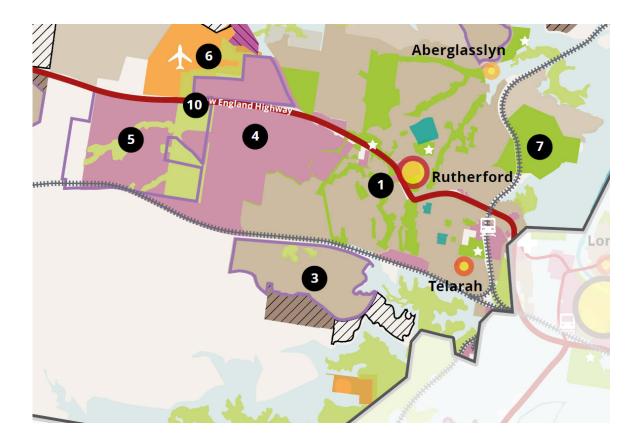
The Farley Urban Release Area is a long standing, identified growth area within the various strategies including the Maitland Local Strategic Planning Statement 2041+. However, there appears to be a mapping anomaly on the Housing Map (Figure 2) within the draft Regional Plan as the expansion of the URA to the south and east is not included. An extract from the Maitland Local Strategic Planning Statement 2041+ has been included as Attachment 2.

Should you have any questions or require hesitate to contact	any further information, please do not at
Yours faithfully,	
	•

Attachment 1 – Proposed Greater Newcastle District Boundary



Attachment 2 – Farley Urban Release Area Expansion



From: noreply@feedback.planningportal nsw.gov au on behalf of Planning Portal - Department of Planning and Environment

To: DPE PSVC Hunter Mailbox

Subject: Webform submission from: Draft Hunter Regional Plan 2041

Date: Wednesday, 1 December 2021 12:04:21 PM

Submitted on Wed, 01/12/2021 - 12:04

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name



Last name



I would like my submission to remain confidential

Yes

Info

Email

Suburb/Town & Postcode

Belmont 2280

Please provide your view on the project

I support it

Submission

On the Draft Hunter Regional Plan 2041 I make the following recommedations:

- 1. Upgrade Belmont to a Strategic Centre. Belmont has many facilities of regional significance Belmont Hospital, Belmont TAFE, Belmont Airport, Belmont Golf Course, Lake Macquarie Yacht Club, Belmont 16's Sailing Club and Entertainment precinct, Sporting fields, Holiday Parks, Belmont We lands State Park and Green Point Reserve State Park, 9 Mile Beach. These significant regional facilities, it's loca ion along the Pacific Highway peninsula and distance from the next closest Strategic Centre of Charlestown (8km), make Belmont an ideal Strategic Centre for East Lake Macquarie. It would serve Caves Beach/Swansea to the South and Valentine, Floraville and Jewells to the North. Future development in Belmont should be on the basis that it will emerge as a Strategic Centre.
- 2. Local councils must provide direct instructions in their Development Application approvals for buildings to attract appropriate tenants that the community needs if a 15-minute regional strategy is to be successful. There are many instances where these tenants are not being generated by the market. An example of how the current process is not working is as follows: Lake Macquarie City Council approved a medium density development at 26 Brooks Parade, Belmont. This building is in an ideal location on the foreshore direc ly behind Belmont Lake Baths, which attracts many swimmers, picnickers and recreational walkers. Historically his site had a fast food store and a restaurant. The ground floor of the newly constructed building is commercial space and is ideal for a small local bar, restaurant or takeaway facilities. Such businesses would add significantly to the foreshore amenity and encourage further development of neighbouring sites. However, this commercial space remained vacant for several years due to the expense and risk involved in setting up a recreational business and was eventually occupied by a Medical Practitioner. It appears that this location is now locked away from it's optimal use. This is a missed opportunity. Business subsidies and incentives were needed to attract he right tenants in his instance. The approved DA should have mandated that a restaurant or o her recreational facility occupy the ground floor for at least the 2 years that it sat empty and such businesses should be subsidised if necessary to activate the site. This would have helped set the tone for the foreshore precinct and prevented unsuitable tenants from occupying prime real estate and locking them away.
- 3. Belmont Hospital has a significant amount of vacant land that should be used in the future partly to support the local neighbourhoods of Green Point, Valen ine Gardens and Spinnaker Ridge Way for any future development of that land. Hunter New England Health and he management of Belmont Hospital should consider the needs of local residents when designing future developments so that it serves heir own medical purposes but also gives local neigbourhoods within 1km a destination to walk to. Such facilities could include a local convenience store for bread and milk and a café. These facilities would also serve people who work at or visit Belmont Hospital, making the tenant businesses economically viable. Local neighbourhoods should be consulted in any future development process to ensure that their needs are included in the development of this valuable land.

I agree to the above statement

Vac

From: noreply@feedback.planningportal nsw.gov au on behalf of Planning Portal - Department of Planning and Environment

To: DPE PSVC Hunter Mailbox

Subject: Webform submission from: Draft Hunter Regional Plan 2041

Date: Wednesday, 1 December 2021 1:07:56 PM

Submitted on Wed, 01/12/2021 - 13:07

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name



Last name



I would like my submission to remain confidential

Yes

Info

Email

Suburb/Town & Postcode

Belmont 2280

Please provide your view on the project

I support it

Submission

In addi ion to my original submission, I would like to add he following recommendation:

4. Include the Gateshead/Bennetts Green/Redhead industrial precinct as Significant Employment Land cluster

These three industrial areas surround he Jewells Swamp catchment. While they are currently physically disconnected, hey combine to make a significant economic and employment base for East Lake Macquarie. The residents of East Lake Macquarie should be encouraged to invest and work in heir local area and this Industrial area is he ideal location for it. Giving this location a strategic designa ion of Significant Employment Land Cluster will help activate the site and promote future appropriate development.

A steering committee for this precinct should be created to iden ify the types of businesses that are best suited to the loca ion. In a post Covid world, East Lake Macquarie is seeing a lot of Sydney siders relocate here due to the relatively inexpensive house prices, proximity of world class beaches, Lake Macquarie and natural beauty. The industrial areas of Gateshead, Bennetts Green and Redhead are perfect loca ions to attract he entrepreneurial ventures of these people eg. micro breweries, tech start-ups, small clothing labels, video production and marketing firms. The idea of cycling through the precinct via the Fernleigh track will appeal to people seeking this lifestyle change.

Transport to this precinct is supported by the Pacific Highway and Newcastle Inner City By-Pass. Pedestrian and Bicycle traffic to this precinct could be well catered for by the Fernleigh Track (an asset which no other industrial park possesses - linking it directly into the Newcastle city centre). Future strategic planning for this site should look at ways in which the industrial areas of Redhead, Gateshead and Bennetts Green can be interconnected via the Fernleigh Track spine with further cycleways through the swamp area, and the use of Pacific Highway, Oakdale Road, Kalaroo Road ring roads. It should be activated by better public transport services. The Newcastle Buses "on-demand" service in the area has been a useful idea in meeting the need of this industrial area in the absence of train or tram services.

The Pacific Highway will remain a vital artery road through East Lake Macquarie but risks becoming gridlocked with traffic unless strategic planning is directed toward proper traffic flow and appropriate land use wi hin East Lake Macquarie to keep traffic with the precinct instead of running through it to other locations.

Conclusion

The Draft Hunter Regional Plan 2041 has a significant blind spot in addressing he specific and unique needs of East Lake Macquarie. The arterial road of the Pacific Highway from Swansea to Charlestown is the only travel route available through this region. It is a significant asset but also a potential obstruc ion to increasing the density of development of this area. Proper atten ion needs to be directed to this issue and the needs of residents, so people can circulate through the area and not drive out of it, resulting in traffic chaos and gridlock as more people use this road.

I agree to the above statement

From: noreply@feedback.planningportal nsw.gov au on behalf of Planning Portal - Department of Planning and Environment

To: DPE PSVC Hunter Mailbox

Subject: Webform submission from: Draft Hunter Regional Plan 2041

Date: Friday, 3 December 2021 8:04:15 AM

Submitted on Fri, 03/12/2021 - 08:04

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name



Last name



I would like my submission to remain confidential

No

Info

Email

Suburb/Town & Postcode

Islington

Please provide your view on the project

I am just providing comments

Submission

It is non scary and safe for people on buses, trains, walking and in cars. What about bicycles? Time for Australia to end the discrimination: it is time to build an UnscaryPushbikeNetwork. Europe has proven you can do it and the health benefits outway the costs.

Basic human right for fresh air and to travel in safety and not put others in danger. We can be more happy with a transition to an ethical World's best practice city planning and transport. Ethical habits are using appropriate technology. All cars above 30km/hr in residential streets are a danger to pedestrians. Car focused ci ies (with urban sprawl) make people unheal hy (body and mind), causing social isolation and internet, homes, food & o her infrustructure too costly. Bust the transport myths that 99% of people are confused about: cyclingfallacies.com/en/

Faster main roads for cars, more buses/trains (screen ime and active transport), better pushbike shortcut pa hs. Pleases everyone, so we can stop the fighting of motorists vs cyclists vs public transport user. Need to start talking about the elephant in the room, the whole system. No silver bullet on one small part of the problem. #cyclesafenetwork#bestbangperbuck#visionzero

Seriously, they need to prioritise safe and convenient places for walking first (footpaths). Then they need to prioritise safe and convenient places for pushbiking 2nd (separate cycle lanes). Then they need to prioritise safe and convenient places for public transport 3rd. Then cars. They need to stop prioritising cars first in the cbd which is causing congestion, pollution, danger, sedentary lifestyle. Basic human rights to walk and cycle without fear of cars please

1b. Better City Planning

High density cities (with affordable housing) are faster (spread out suburbs are inefficient and get people addicted to cars) and cost benefit ratios for bicycle paths show increase in society health and increase in business/shops near them. Currently half of the vegetables we in NSW eat are from city fringe farms that are due to be overrun by urban sprawl. Train transport through the bush linking up higher density ci ies. Stop urban sprawl causing social isolation and wasted travel time and contribu ing to housing being unaffordable. Curtin uni has done a study that shows the infrastructure (road, water, sewage, phone/NBN, electricity etc) costs for a new suburb are \$684,000 per dwelling (Cur in_Sustainability_Paper_0209). Why waste his money to build a house hat makes people unhappy driving 2 hours to work and unhealthy because they have no time for exercise. More mixed social housing (and making it compulsory for 30% of apartments in each sky scaper is needed for basic human right to have a home. Bust the transport myths that 99% of people are confused about: cyclingfallacies.com/en/

Some people only drive in day time, so who should pay for street lighting. Whole of society pays for footpaths, roads and street lighting. Walking, buses and cycling is good for the whole of society, reducing congestion and making society more healthy.

Please everyone stop tailgating on purpose: Awesome that covid has made drivers care for others. Many are being safe and following road rules 144 and 126. In the past 99% in NSW did not have control to stop if the car in front does an emergency stop. You are tailgating in this case (negligent driving and road rule 126 is an "if" rule, not a "when"). If the 3seconds safety gap was enforced we would have less road deaths. 3seconds is 50metres at 60km/hr and 84metres at 100km/hr. So by definition over 95 % of NSW drivers pretty much continually tailgate. Do the super easy research yourself. This is why many safety conscious people give up on the car because they cannot control the car dangerously following them.

City transport is confusing and counter-intuitive. Slower local roads makes for faster trips! Because in the long run if more people are on buses, trains and bicycles it means more parking places (esp. for the less able) for the fewer cars on the roads. Currently there is discrimination and speed and cars are prioritised and all other choices are not viable for most. Lower local speed limits encourages active travel, otherwise Newy becomes as gridlocked as Sydney. This is not my view: It is our city's vision for a liveable, healthy, safe, future that has community consultation:

Newcastle.nsw.gov.au_Newcas le2030 . World's best practice is Active transport having priority, to free up roads for less able and

Newcastle.nsw.gov.au_Newcas le2030 . World's best practice is Active transport having priority, to free up roads for less able and CycleSafeNetwork.org.au

Australia to end the discrimination: it is ime to build an UnscaryPushbikeNetwork. Europe has proven you can do it and the health benefits outway the costs.

It is non scary and safe for people on buses, trains, walking and in cars. What about bicycles and E-bikes

Need most of NCC money and time put into #CycleSafeNetwork (stop wasting time on other stuff) to achieve it's 2030 vision. NCC's 2030 vision is for most trips to be a viable option for walking and cycling (short trips under 5km that are considered too dangerous now). To achieve this vision we need a fully separated from cars pushbike network by 2019 (including all local roads 30km/hr by narrowing and speed bumps). Then 11 years of intense social engineering schemes to get he new generation transitioning to walking and cycling. Need to reverse he habits poeple have gotten into. For mental health, for liveable cities, for safety, for economic sustainability, for improved local business, for less road congestion!

The bigger picture is: Is it a proper user pays system? Do all car costs pay for road usage? The answer is easily searchable. Poor homeless people are funding highways/roads through GST because motorists are not paying their share.

Without adopting worlds best practice road safety systems (Inc. Active transport like some European countries). We in Oz are making small changes to a system hat is broke and will never drastically reduce road trauma.

I agree to the above statement

From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Tuesday, 4 January 2022 9:30:05 AM

Submitted on Tue, 04/01/2022 - 09:29

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name



Last name



I would like my submission to remain confidential

Info

Email



Suburb/Town & Postcode

Please provide your view on the project

I am just providing comments

I would like to see more about future public schools, with the massive growth of Cameron park/west Wallsend area plus more development in progress, there has been a huge increase in young families living here. We NEED another primary school and high school in the area. Teachers and local schools are being flooded.

I agree to the above statement

From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Tuesday, 25 January 2022 8:46:41 AM

Submitted on Tue, 25/01/2022 - 08:46

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name



Last name



I would like my submission to remain confidential

Info

Email

Suburb/Town & Postcode

Please provide your view on the project

I am just providing comments

I do not believe in getting to places by 15 minutes. I have realized that you do need a car living in a country area! Of course there is public transport but here are not alot of services.

I am looking for a job and alot of employers want you to have a car. So that puts me at a disadvantage.

I agree to the above statement

Draft Hunter Regional Plan 2041



January 2022

Purpose

The would like to express their support for the Draft Hunter Regional Plan 2041 (the Draft Regional Plan).

The Public Spaces Division has previously prepared a guide to inform updates to all Regional Plans which included six recommendations (outlined below) to embed walkable access to quality public spaces at all scales of development from small rural towns to large metropolitan cities.

These recommendations were designed to promote the objective of the Government Priority *Greener public spaces* to 'Increase the proportion of homes in urban areas within 10 minutes' walk of quality green, open and public space by 10% by 2023' at a strategic planning level across the NSW regions. The six recommendations are:

- Make quality public space a focus of the Regional Plan vision and refer to 'public space' consistently throughout Regional Plans
- 2. Include Spatial Mapping of public spaces
- 3. Undertake public space needs analysis to inform the Regional Plan
- 4. Plan for walkable, quality public space in line with the NSW Public Spaces Charter principles
- 5. Promote and deliver high-quality open space, parklands and landscape outcomes in the region
- Retain and deliver green infrastructure including tree canopy to support liveability and a healthy environment

The Regional Plan and the majority of this feedback has been taken on board.

We have one minor request – that the references to the *Public Spaces Charter* be updated to the *NSW Public Spaces Charter*.

Once this is addressed we are happy to support the Draft Regional Plan and thank the team for their meaningful engagement during the drafting process.

We note there is also no longer a Minister for Public Spaces but presume this will be a standard matter to addressed prior to the release of the Final Regional Plan.

If you would like to discuss this further, please contact

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From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Tuesday, 1 February 2022 3:54:06 PM

Attachments: 220119-draft-hunter-regional-plan---public-spaces-division-letter-of-support docx

Submitted on Tue, 01/02/2022 - 15:52

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name



Last name

I would like my submission to remain confidential

Info

Email

Suburb/Town & Postcode

Parramatta

Please provide your view on the project

I am just providing comments

Submission file

220119-draft-hunter-regional-plan---public-spaces-division-letter-of-support.docx

Submission

Refer to attached submission.

I agree to the above statement

From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Monday, 7 February 2022 6:55:40 PM

Submitted on Mon, 07/02/2022 - 18:55

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name



Last name



I would like my submission to remain confidential

Info

Email

Suburb/Town & Postcode

Please provide your view on the project

I object to it

What imaginary greens jobs are going to replace the the very well paid jobs in mining and power industry???

I've worked in the power industry for 20 years as a supervisor and before that the coal mining industry. I personally know that what you are talking about is completely preposterous to think that renewables can replace base load power.

Just because people say it on tv doesn't make it true.

Any argument that you wish to present to me that you believe these renewables could take over are false and if you'd like to argue different please state facts not aspirations.

I agree to the above statement







18 February 2022



DRAFT HUNTER REGIONAL PLAN 2041 BROADMEADOW LOCOMOTIVE PRECINCT (TAHE)

We write in response to the public exhibition of the Draft Hunter Regional Plan 2041 (draft Plan). is the owner of the former would like to thank the Department of Planning and Environment (DPE) for the opportunity to review and comment on the draft Plan. is very supportive of DPE's review of the Plan and the new focus on making the region more diverse, resilient, and sustainable. As the past couple of years have shown, we need our cities to be agile so that they can adapt to the changing way people are living and working. is also supportive of the place-based approach to development planning that is adopted in the draft Plan. In this regard has a vision of revitalising the Locomotive Precinct by creating a new mixed density residential community that has the former locomotive heritage buildings at its heart. will seek to re-activate the heritage buildings through a suitable adaptive reuse approach, creating a destination and sense of place for the new medium - high density residential community that will be located in the Locomotive Precinct and the broader Broadmeadow strategic centre. To realise the vision, is keen to be involved in the development of a place strategy for Broadmeadow and will shortly commence preparation of environmental studies to support and potentially expedite this process as it relates to the Locomotive Precinct. will be looking to engage with DPE and Council in the coming months to progress the planning for this precinct and the development of a masterplan/structure plan.



In respect of the finalisation of the draft Plan, it is requested that the following minor amendments are made to the document:

- The Broadmeadow strategic centre is missing from the diagram on page 40 of the document and should be included as it is a key strategic centre.
- The 'locomotive depot' symbol on Figure 9 (page 70) should be relocated to the edge of the site
 or within the rail corridor as the site is no longer a 'locomotive depot'; alternatively, the legend
 should be amended to read 'Locomotive Precinct'.
- Figure 9 on page 40 currently colours the whole TAHE site as a heritage asset. Whilst it is
 understood that this is consistent with the mapping contained within the Newcastle Local
 Environmental Plan, it is not reflective of the heritage elements that exist on the site. It is
 suggested that it would be better to highlight the key heritage assets consistent with the
 shading shown over the page which reflects the State Heritage listing rather than blanket
 shading the whole site.

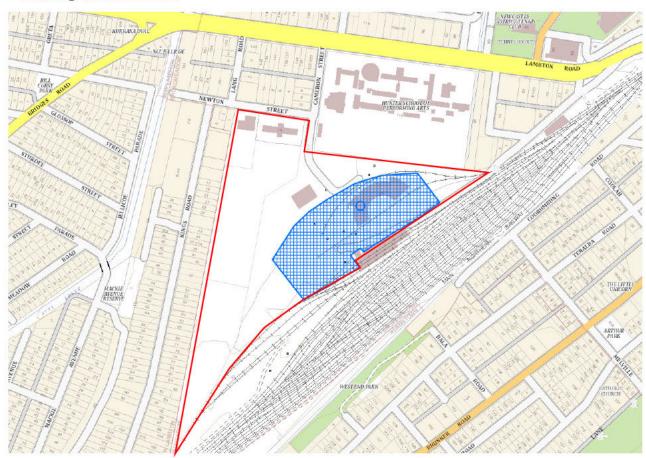


Figure 1 – The Locomotive Precinct (red boundary – approximate) with the State Heritage assets shown in Blue.

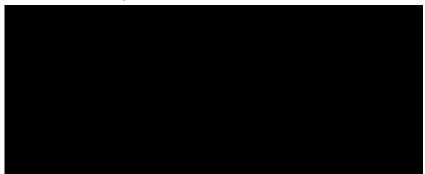




Thank you again for the opportunity to comment on the draft Plan. We would welcome the opportunity to meet with DPIE staff should they have any questions or wish to discuss any aspects of this submission.

If you have any further questions, pleased to take your call on I hope this has been of assistance.

Yours sincerely



From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Monday, 21 February 2022 10 09:02 AM

Attachments: 220218-tahe-broadmeadow-submission-draft-regional-plan-2041 pdf

Submitted on Mon, 21/02/2022 - 10:07

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name



Last name

I would like my submission to remain confidential

Info

Suburb/Town & Postcode

2000

Please provide your view on the project

I support it

Submission file

220218-tahe-broadmeadow-submission-draft-regional-plan-2041.pdf

Submission

Please see attached letter submitted on behalf of TAHE.

I agree to the above statement

From: noreply@feedback.planningportal nsw.gov au

To: <u>DPE PSVC Hunter Mailbox</u>

Subject: Webform submission from: Draft Hunter Regional Plan 2041

Date: Thursday, 24 February 2022 9:22:16 AM

Attachments:

Submitted on Thu, 24/02/2022 - 09:21

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name



I would like my submission to remain confidential

No

Info



Suburb/Town & Postcode

Hawks Nest NSW 2324

Please provide your view on the project

I object to it



Submission



To whom it may concern

I would like to introduce myself; I started a community facebook group in 2019 to provide informa ion about developments in our community Hawks Nest/Tea Gardens. The group was organized to make the community aware developments that were exceeding the council zonings..

Hawks Nest/Tea Gardens is surrounded by National Parks, Surf beaches, flat water beaches, rivers, and lakes. Our community and town attract visitors and permanent residents due to its seaside bushy character and feel.. Developers have seen an opportunity with our towns and are slowly buying either land parcels or blocks of land joining them and then rezoning to suit themselves. We are seeing an influx of DA's exceeding he council zonings. Our zonings are maximum hree stories al hough the developers are using a loophole with he 10% leeway for put ing in infrastructure such as air con units' lifts etc. and are using the four h stories for living as well. Which then makes these four stories high not three overpowering neighbors. Due to the nature of our towns, we have a high number of boat enthusiasts, he DA's being put to council are not covering the visitor's needs (either no boat parking or not enough). We already have an issue wi h access to streets because of this and with the poor planning of these future developments will create more chaos in our streets.

Key issues:

- Bulk and Scale of proposed developments.
- Exceeding heights to put in extra living space making these developments four stories.
- Reduced setbacks
- Removal of native fauna and flora (Koala trees for which we have had a massive decline).
- Not enough car parking on property.
- Not enough boat and trailer parking on property.
- Traffic congestion.
- Not building to the aesthe ics of the town.

Suggestions:

- Three stories restriction, no living on the fourth floor.
- No reduced setbacks.
- $\bullet \ \text{Parking accommodating to the amount of people per unit eg 2 car spots for 2 or 3 bedroom apartments not 1 \%.}$
- Trailer and boat parking for each unit.
- Tree plantings for our Koala Corridors and other wildlife.
- Timber fences for he wildlife.
- Our infrastructure is restricted, shouldn't the town have a limit, therefore not exceeding capacity.
- Build to suit the aesthetics of our seaside village.

- More houses on decent blocks of land for families with their toys (boats, bikes etc).
- · Possible look into our council to ensure no corruption is happening.

Below are only some of the examples of DA's that have exceeding zoning requirements:

Yamba/Booner Street Development DA283/2019

- Stage 1 Three blocks of land.
- 31 units, 45 carparking spots, no boat parking.
- 4 stories high.
- · Reduced setbacks.
- Removal of Koala trees and blocking part of the koala corridor.
- · Underground car parking, possible water issues

Marine Drive Development DA2021/2128

- Two Zonings B1 and R2 both exceeding heights to 5 stories high.
- · Insufficient boat parking.
- Underground parking on a river front with rising water and floods due to high king tides.
- · Historic building torn down.

32 Yamba Street Development DA2021/2374

- · 4 stories high.
- 2 x shop small shop spaces, 10 units.
- No boat parking.
- Probably the only block of land to have commercial built on it but only building 2 x small shops, could do with a larger premises for restaurant.
- Removal of over 18 gum trees (all trees on property).
- 1 Sanderling Avenue Hawks Nest rezoning of Aboriginal Land.
- No DA as yet but they have proposed 4 x stories.
- Corrupt sale of land.
- Rezoned after sale of land.

In short, hese developments are not in keeping of the area and should in your words enable growth in a way that complements he desired local character and natural set ing of an area.

As we are a holiday des ination we have many visitors, although the developers are only submitting unit blocks to make a quick dollar, this does not cater for the people who work in this town and families. We are slowly getting taken over by units, which are overbearing and ugly to our seaside village and empty for most of the year. In Booner/Yamba street the developer has over 10 blocks of land and will be tearing down several homes, he has already taken down three. Not all visitors want to stay in a unit, but poor planning is giving visitors no choice.

Our community is exhausted from constantly having to submit against ridiculous DA's being submitted.

I guess I and the community seek your help in relation to the potential destruction of our seaside community and the native landscape we all call home. Our local real estate agents have wai list for people to find homes not units which seem to be what developers are planning for our town.

Please help our community.

I would also like to add on a side note, that housing developments are popping up everywhere. In this process:

- · All the trees are removed.
- · Blocks are too small houses are cramped next to each other basically you can see and hear your neighbors.
- · Cars lining the streets as not enough parking.
- Streets are not wide enough for traffic due to parking on streets and curbs.
- No replanting of trees in streets.
- No infrastructure for traffic in surrounding communities.

Basically, what is happening the developers are creating potential poverty suburbs and the prices are not inline with this.

I agree to the above statement

noreply@feedback.planningportal nsw.gov au DPE PSVC Hunter Mailbox From:

To:

Subject: Webform submission from: Draft Hunter Regional Plan 2041

Friday, 25 February 2022 10:22:01 AM Date:

Submitted on Fri, 25/02/2022 - 10:21

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name



I would like my submission to remain confidential

Info

Email

Suburb/Town & Postcode

Taree, 2430

Please provide your view on the project

I am just providing comments

The plan as it stands is excellent and provides clear outlines for infrastructure planning for the broader Hunter/MidCoast region. However, I am concerned hat it does not go far enough to address the skills shortages that are hampering economic activity in the regions outside of Newcastle.

Specifically, the cost of housing combined with lack of educational opportuni ies are key factors in preventing skilled professionals from moving into the

The MidCoast LGA is the most populous area in Australia that does not have access to a generalised tertiary education provider. This prevents young people from becoming skilled in areas that are in need to he local areas, as well as preventing the general skills base of the region to grow. We see the impact of this in towns such as Tuncurry, where as recently as 2021, there was a 50% vacancy rate in the main CBD.

Within the plan here needs to be greater mention of and provisions for educational institutions in order for the plan to become fully actualised. Otherwise, we will have a myriad of infrastructure built, but nobody utilising it.

I agree to the above statement

From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Friday, 25 February 2022 11:20:27 AM

Submitted on Fri, 25/02/2022 - 11:20

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info



Suburb/Town & Postcode

Toronto

Please provide your view on the project

I am just providing comments

There is too muchemphasis centre on Newcastle...Lakemac is a much bigger city! Traffic is horrendous in he Hunter, especially in west Lakemac. So, a great need for really great public transport routes to cut down on traffic. Also, new subdivisions need to incorporate trees and wildlife corridors with houses spread out between. Plan for street trees. Solar panels need to compulsory for new houses. Places for community gardens/green spaces as people work from home!

I agree to the above statement

From: noreply@feedback.planningportal nsw.gov au

To: DPE PSVC Hunter Mailbox

Subject: Webform submission from: Draft Hunter Regional Plan 2041

Date: Monday, 28 February 2022 2:37:07 PM

Submitted on Mon, 28/02/2022 - 14:36

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name



I would like my submission to remain confidential

Nο

Info

Email

Suburb/Town & Postcode

OATLEY - NSW (2223)

Please provide your view on the project

I am just providing comments

Submission

The Hunter Regional Plan has missed one of he most important matters - a Very Fast Train service from Newcastle to Sydney and Canberra. Currently, the train service from Sydney to Newcastle takes approximately 4 hours. (No wonder people wishing to travel to Newcastle or fur her, use their car).

State governments have been talking about a Very Fast Train service for years. Now is the ime to do it. If it's done correctly, (taking into account rail gauges, etc), this would not only open up the Central Coast and Hunter areas but create jobs, remove traffic congestion and allow faster access for people living in hese areas to Sydney and beyond. It would be a win-win!! Consideration should also be given to extending the Very Fast Train service to include the airport at Newcastle. This would be a bonus for travellers wishing to fly into Newcastle Airport and travel to the Central Coast area or Sydney. Newcastle is the second largest city in New Sou h Wales. It deserves so much more than a rail service not much faster han an old steam train.

The cost would be great, but interest rates are cheap and the government could do something really innovative and be the first state government to develop a Very Fast Train service.

On an entirely different matter. I note that the area of Hawks Nest/Tea Gardens has been included in the draft plan. Currently those areas are being swamped with developers submitting inappropriate development applications - large, bulky, and visually obtrusive, removing numerous koala friendly trees, inadequate off street parking and structures completely out of character for the area.

Tea Gardens/Hawks Nest does not have the infrastructure to support hese developments. Many properties are left vacant for most of the year. The height of many of the developments is NOT in the public interest and is simply to maximise he profit for the developer.

One wonders why planning controls are in place, when a developer can apply for massive variations from the documented standards, and have those variations approved.

I agree to the above statement

From: noreply@feedback.planningportal nsw.gov au

To: <u>DPE PSVC Hunter Mailbox</u>

Subject: Webform submission from: Draft Hunter Regional Plan 2041

Date: Tuesday, 1 March 2022 1:10:41 PM

Submitted on Tue, 01/03/2022 - 13:10

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info





Suburb/Town & Postcode

2334

Please provide your view on the project

I support it

Submission

We recognise that the area is growing in need for urban land, with media reports in the last couple of mon hs showing that land values have increased exponentially in the North Arm Cove and Pindimar/Burndabah areas, the real estate industry reports they are the highest in the Port Stephens Area. The proposed developments at Williamtown announced by the Morrison Government in May 2021, and the '6 cities' Plan in December 2021 announced by NSW Premier Mr Perrotet will also increase the demand on urban land.

Services such as RFS and SES rely on community volunteerism, these communities are aging.

In the 'MCC Urban Release Areas Report' 2005 the area was iden ified as a 'growth area', but was removed without explanation in subsequent reports. Recent figures released support the 2005 report.

The residential areas of Pindima and Bundabah have adjoining non urban and urban lands within he village area. This proposal to rezone non urban land to Environmental/Conservation land will see a potential E3 block beside a residential home. There is no logic in this 'blanket' planning, we therefore support consideration of rezoning these blocks to urban.

MCC must reconsider the opportunities for controlled development, with logical planning, to meet demands for growth whilst protecting the environment and demand of urban land.

I agree to the above statement

noreply@feedback.planningportal nsw.gov au DPE PSVC Hunter Mailbox From:

To:

Subject: Webform submission from: Draft Hunter Regional Plan 2041

Wednesday, 2 March 2022 11:30:57 AM Date:

Submitted on Wed, 02/03/2022 - 11:30

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name



I would like my submission to remain confidential

Info



Suburb/Town & Postcode

Tea Gardens

Please provide your view on the project

I am just providing comments

While the draft plan mentions housing diversity there appears to be no sugges ion of Eco developments and sustainability. The Hunter region is ripe for such developments which could incorporate car sharing (GoGet model), charging stations for electric vehicles, composting toilets, solar/wind energy provision...... A project could be developed on a greenfield site which does not have ecological significance. I'm thinking North Arm Cove which is close to employment and housing in the area is scarce. There must be other sites which would be suitable. Please incorporate this into the plan to future proof communities.

I agree to the above statement



Introduction

appreciates the opportunity to comment on the first five year review of the Central West and Orana Regional Plan 2041.

is the peak industry organisation representing the State's \$36 billion minerals industry. provides a single, united voice on behalf of almost 100 members, ranging from junior exploration companies to international mining companies, as well as associated service providers.

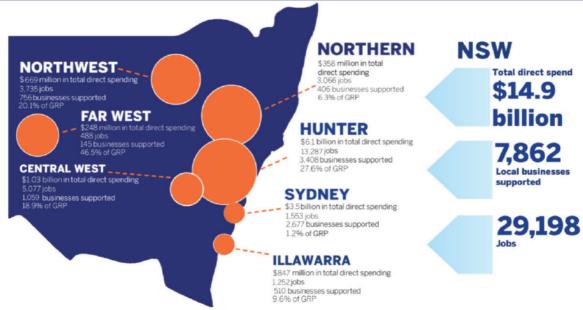
Mining is a strategically important industry for the NSW economy, and enjoys strong community support. Mining underpins the strength of regional economies across the state, including the New England North West region, and has significant flow on benefits to other industries.

The NSW mining industry:

- Is the state's largest export industry by value;
- Directly employs 37,500 people in NSW, according to the ABS, and supports the jobs of many thousands more people indirectly;
- Directly spent almost \$15 billion on goods and services, wages and salaries, local government payments and community contributions in NSW during 2019/20;
- Supports almost 8,000 businesses throughout NSW;
- Royalties are forecast to deliver a record \$2.8 billion for NSW in 2021/22, up from the original forecasted \$1.6 billion, and double the \$1.4 billion collected in the 2020/21 budget.
- Provides the metals that are critical for delivering renewable energy; and
- Provides the energy needed to deliver over 80 per cent of the electricity used in NSW.







*Jobs are based on survey results which are different to ABS jobs data

The Hunter Valley coal mining industry is the largest coal producing area in NSW. As the Regional Plan highlights, mining is a significant source of direct and indirect jobs and underpins much of the Hunter's prosperity.

The NSW Government's 2020 Coal Strategy highlights the important role coal mining and export will continue to play in the NSW economy over the coming decades. The report includes forecasts that show the current levels of global coal demand remaining relatively stable to 2050, with falls in some markets to be partially offset by increases in others.

In the 2021 calendar year, the NSW coal industry exported almost 160 million tonnes of coal through the Port of Newcastle, with most directly from the Hunter Region. The sustained global demand for NSW's high quality mineral resources, including coal, and ongoing high prices have underpinned the record royalties projected to be returned to the State in the 2021/22 Budget.

Comments on the Updated Regional Plan

The Plan includes multiple references that support the flexible diversification of the Hunter's mining and energy industries. These are supported.

The commentary and Strategies under Objective 1- *Diversify the Hunter's mining, energy and industrial capacity*, and *Part 3 - District planning and growth areas (Central Hunter)* send clear signals the NSW Government will support a flexible approach for post mining land uses that maximise opportunities for employment generating activities, or other alternative uses depending on the nature of the site. This approach is welcomed by the NSW mining industry.



However, while the Plan acknowledges that the mining and energy industry sectors make the Hunter and "economic powerhouse" which will continue to remain important contributors to the regional economy into the future, and also acknowledges that "some mines will continue to expand", there are no references to, or strategies proposed that seek to protect resources for the duration of coal mining in the Hunter.

The lack of clear protection strategies for existing resources in the Hunter is inconsistent with the NSW Government's Strategic Statement for Coal, and other draft Regional Plans recently made available for public comment.

Given the obvious importance of the mining industry to the Hunter Region, the Plan should at a minimum include references to the the NSW Government's comprehensive mining policy framework consisting of:

- The Strategic Statement on Coal Exploration and Mining in NSW
- The NSW Minerals Strategy
- The NSW Critical Minerals and High-Tech Metals Strategy

Further, both the *Draft New England North West Regional Plan 2041*³ and the *Draft Central West Orana Regional Plan 2041*⁴ include references to the Strategic Statement on Coal. Given the scale and importance of the coal mining industry in the Hunter, it appears to be an oversight to exclude any reference to the NSW Government's policy framework supporting the industry.

The NSW Government's mining policy framework outlines a range of initiatives which if all implemented will ensure the state is well positioned to take advantage of future opportunities. Referencing the strategies will further promote awareness of all potential future resource mining opportunities in the Hunter Region.

There will also be an increasingly diverse range of opportunities for regional areas that will support diversification of regional economies. This will include downstream minerals processing, education, research and development, advanced manufacturing amongst others. The NSW Critical Minerals and High-Tech Metals Strategy acknowledges these opportunities and identifies a range of actions to attract future investment. The existing Hunter Valley mining industry, as well as the thousands of businesses that support the industry, will be well placed to take advantage of future opportunities.

Furthermore, both the *Draft New England North West Regional Plan 2041* and the *Draft Central West Orana Regional Plan 2041* include specific strategies to protect minerals resources including:

- Use local strategic planning and planning proposals to consider the ongoing operation of mining and resource extraction and future development of known resources by:
 - o identifying and protecting key areas of mineral, petroleum and energy resources potential
 - protecting related infrastructure, such as road and rail freight routes, from development that could affect current or future extraction.
- Consult with the NSW Division of Mining Exploration and Geoscience when assessing applications for land use changes (strategic land use planning, rezoning and planning proposals) and new developments or expansions.⁵

⁵ Page 30 - Draft NE/NW Regional Plan 2041 & Page 72 - Central West and Orana Regional Plan 2041



¹ Page 22 - Draft Hunter Regional Plan 2041

² Page 79 - Draft Hunter Regional Plan 2041

³ Page 30 - Draft NE/NW Regional Plan 2041

⁴ Page 72 - Central West and Orana Regional Plan 2041

As already noted, given the importance of the Hunter coal industry, and the existing NSW Government policy framework for mining, similar strategies that protect resources (such as those included in other regional plans) should also be included in the draft Hunter Regional Plan 2041.

The commentary and Strategies under Objective 8- Build an inter-connected and globally focused Hunter signals the Government understands and supports the global connectivity that competitively positions the industries of the Hunter. However, while the Plan acknowledges this competitive position it does not sufficiently detail support for or protection of supply chain infrastructure, freight corridors and strategic land associated with vital trade through global gateways, including coal export facilities.

The Greater Newcastle Metropolitan Plan 2018 outlines the desired roles of the global gateway of Newcastle Port recognising the importance of support and protection of infrastructure, freight corridors and strategic land:

- Global gateway, providing international freight connections servicing Greater Newcastle and the Hunter Region
- Capacity to generate port-associated industry and regional and local employment while
 planning for land use compatibility, acknowledging the high demands on land and
 infrastructure affecting surrounding lands and requiring a separation from adjoining land
 uses to sustain their success.⁶

In addition, maintaining global connectivity and maximising opportunities for the Hunter relies on the coordination of strategies across NSW Government, working together to support common objectives. The Plan must be reconciled with other Government plans and strategies, such as the Lower Hunter Freight Strategy, to ensure consistency of objectives and outcomes and importantly providing certainty to business and community.

If the NSW Government is committed to delivering on potential opportunities promoted in the Hunter Regional Plan, particularly those underpinned by the strength of the Hunter Valley mining industry, it's critical that issues are resolved in a timely and constructive way at a project-by-project level.

Producing this Regional Plan is ultimately pointless if actual projects fail to proceed due to government regulatory hurdles that stop investment and employment from flowing to the region itself.

-



⁶ Pg 68 - Greater Newcastle Metropolitan Plan

From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Wednesday, 2 March 2022 1:46:45 PM

Attachments: 220304-hunter-regional-plan---nswmc-submission.docx---google-docs.pdf

Submitted on Wed, 02/03/2022 - 13:45

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info



Suburb/Town & Postcode

Sydney

Please provide your view on the project

I am just providing comments

Submission

See attached submission

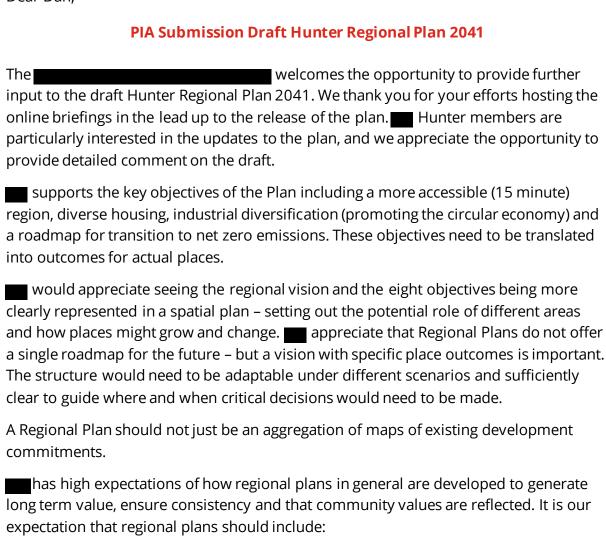
I agree to the above statement



28 February 2022

Mr Dan Simpkins
Director Central Coast and Hunter
Department of Planning and Environment
PO Box 1226,
NEWCASTLE NSW 2300
hunter@planning.nsw.gov.au

Dear Dan,



- a) a coherent growth plan identifying outcomes for the region and its centers
- b) apply consistent parameters for population, demographic and infrastructure demand
- c) embed resilience in planning for alternative futures and hazards
- d) set the role of planning in pathways to net zero carbon for the built environment
- e) strengthen regional connectivity
- f) establish governance arrangements to deliver infrastructure for place outcomes

These objectives have helped form the basis for the review of the draft Hunter Regional Plan 2041 (Draft Plan). Considering this, NSW has identified the following key issues:

- Alignment between the Greater Newcastle Metro Plan 2036
- How the LSPS' are effectively represented in this plan
- Transparency of Urban Development Program
- Does this just 'bolt the LSPS' together
- Strategic direction
- Clear Actions
- Omission of objectives protecting Scenic Values, and Cultural and Heritage Values
- Presentation of information

1. The Spatial Vision

Overall, the plan addresses many important issues but avoids setting out a strong spatial vision for how the region will be structured, grow and change. It is critical that regional strategic plans provide a clear vision and actionable steps to achieve that vision.

suggests that further engagement is needed to embed important elements (eg 15 Minute Region and Transition to net Zero emissions) into a coherent spatial vision describing the role of different places and centres and the options for growth and change at different times in the future.

The regional vision (p.14) outlines what the Hunter already is, not what the Hunter is aiming to be. What should the Hunter prioritise? What areas should we not focus on as much and what areas should we pursue? What from the Hunter Regional Plan 2036 are we on track to achieve, or have already achieved, and how has this Draft Plan utilised that information? How would different centres relate to Newcastle and each other – and how might their roles develop? How closely would Newcastle be connected to Sydney and the Central Coast - other than by road?

This information would help the public understand the value embedded in this Draft Plan. It would also help the community appreciate where and why increased urban densities are being sought.

Below we have elaborated further on the key issues raised above.

<u>Recommendation 1</u> – Include a spatial strategic vision, regional structure and place outcomes that demonstrate how the Regional Vision and objectives will shape places towards 2041. Urban density aspirations should be understood in this context.

<u>Recommendation 2</u> – Include a statement of much value and avoided cost (\$) the achievement of the regional Plan outcomes could return to the public by 2041.

2. Alignment between the Greater Newcastle Metro Plan 2036

The Draft Plan must achieve synergies with the Greater Newcastle Metropolitan Plan 2036 because they are two endorsed strategies produced by the same government agency that partly cover the same geographical area.

Some examples of where the two adopted parts depart from each other are:

The Draft Plan states that proposals will reflect a density ratio of 50-75 dwellings per hectare (p.38), whereas the Metropolitan Plan states that a minimum residential density of 15 dwellings per hectare in URAs (p.45).

The Draft Plan does not contain dwelling targets for each of the local government areas (LGAs) (p.38), but the Greater Newcastle Metropolitan Plan identifies specific dwelling targets (p.44).

The Draft Plan specifies infill and greenfield targets for the different districts (p.38), which differ from the standard 40% greenfield and 60% infill targets in the Greater Newcastle Metropolitan Plan (p.44).

The Draft Plan maps districts (p.60), such as the 'Greater Newcastle District', which differs from the boundary of the 'Metro Frame' within the Greater Newcastle Metropolitan Plan (p.11).

The Draft Plan states that the Department will continue to work with stakeholders to implement the Greater Newcastle Metropolitan Plan 2036 (p.63), but it is not clear how this would be possible when there are inconsistencies between the two planning strategies.

<u>Recommendation 3</u> – Undertake a detailed cross-reference between the actions contained within the Greater Newcastle Metropolitan Plan 2036 and the Draft Plan to ensure that there are no actions that contradict one another.

3. How the LSPS' are effectively represented in this plan

The local strategic planning statements (LSPS) information varies between councils (some include general comments and goals, others include very specific targets). How can they effectively be represented in this plan?

The Draft Plan must provide consistency in identifying future residential land to their lot boundaries. This could be achieved by placing land into these categories:

- Under Construction,
- DA Approved,
- Zoned, but not approved,
- Gateway Determination, or
- Identified in a Land-Use Strategy, and
- Land for Future Investigation.

The Draft Plan clearly maps 'proposed urban release areas' (p.116) in the Mid-Coast LGA to their lot boundaries, but then only identifies broad localities as 'priority locations for future housing' in Port Stephens (e.g., Medowie). This is a reflection of the differing LSPS'.

The locations identified in the Mid-Coast LGA reflect the Mid-Coast Urban Release Areas Report that was adopted by Council in August 2021. At the same time, Port Stephens has multiple Local Strategies that have also been adopted by Council (e.g., Medowie Strategy) that identifies future residential to the lot boundaries.

Neither the Mid-Coast Urban Release Areas Report, nor the Medowie Strategy has been endorsed by the Department of Planning, Environment, and Industry and therefore this represents an inconsistency about how residential land has been identified across LGAs.

<u>Recommendation 4</u> – Identify future residential land to their lot boundaries where this land has been identified in a Council endorsed land-use plan (e.g., Medowie Strategy).

4. Urban Development Program does not appear transparent enough in what they do. More Reporting required

The Draft Plan must provide a transparent and evidenced based framework to achieve affordable housing (a general approach is; supply – annual take-up + contingency = supply gap). At present, the Draft Plan states that:

'As of 2020, the Hunter had 49,000 potential lots in zoned and undeveloped residential land and 1,507ha of undeveloped employment land. There are also an additional 6,600 lots with a gateway determination to proceed' (p.71).

The Draft Plan does not explain how these 49,000 lots has been calculated, nor does it cite an annual take-up rate to 2041. We need to understand the methodology behind these numbers to ensure that the whole profession focuses resources on key localities where commitments have been made in infrastructure.

A current example of how this is being achieved is provided by the Greater Sydney Urban Development Program (UDP) Dashboard

https://www.planning.nsw.gov.au/research-and-demography/urban-development-program >. If this live and interactive Dashboard was be expanded to the Hunter Region, it would be significant improvement over the one report provided by the Greater Newcastle Urban Development Program in February 2020.

The UDP also is tasked assisting infrastructure coordination in the Hunter. Transparency is key to ensure the industry is aware of the decisions being made and the key delivery timeframes.

<u>Recommendation 5</u> - Create a Greater Newcastle Urban Development Program Dashboard by the end of 2022. This Dashboard should provide quarterly updates.

5. Synthesising the LSPS's together within the Draft Plan

The Draft Plan states:

'The regional plan draws from each council's local strategic planning statements prepared in accordance with section 3.9 of the EP&A Act. It acknowledges common interests without duplicating aspects of land use planning. Rather than dictate additional actions for councils, the Draft Plan identifies the objectives and principles that councils should apply during local strategic planning or when considering development proposals' (p.8).

Similar to the first recommendation about synergy with the Metro Plan, we request that the Draft Plan list visions, objectives, and actions of each LSPS and how these have been incorporated into the Draft Plan. This would be a useful exercise so that Councils can understand their alignment with the current Draft Plan.

<u>Recommendation 6</u> - Undertake a detailed cross-reference between the actions contained within Council LSPSs and the Draft Plan understand alignment between Local Government and State Government regarding strategic planning.

6. If you don't know where you've come from, you don't know where you're going

The Draft Plan needs to set a baseline, what is our current position (i.e., what is the infill/greenfield ratio that we are currently achieving?) and how did we get to this position? Is our current position the result of achieving previous actions or have we fallen short? What value are we trying to create? How will the Hunter be different?

Only by understanding what we have achieved, can we then develop strategies/actions to achieve the agreed objective (e.g., density to support public transport). We need a Report Card against past strategies, before producing a new Strategy.

It is common practise in other professions to evaluate how a development or task performed and use those metrics to achieve better results going forward. It would be useful to do the same in the Draft Plan.

<u>Recommendation 7</u> – Provide a form of Report Card against the actions contained in the Hunter Regional Plan and Greater Newcastle Metropolitan Plan.

7. Clear Actions (Density objectives and integrated infrastructure planning)

The Draft Plan states that:

'The regional plan is a 20-year land use plan prepared in accordance with section 3.3 of the Environmental Planning and Assessment Act 1979 and applies to the LGAs of Cessnock, Dungog, Lake Macquarie, Maitland, Midcoast, Muswellbrook, Newcastle, Port Stephens, Singleton and Upper Hunter' (p.9)

In accordance with the Act, the draft Plan has a stated vision (p.14), associated objectives (p.21) and strategies, but the strategies are very limited in detail. Strategy 4.1 states:

'at a minimum development proposals will reflect a density ratio of 50-75 dwellings per hectare of development land, which is a density range considered to be the minimum necessary for there to be reasonable public transport and to support a local mix of land uses' (p.38).

The actions contained in the Draft Plan need to be broken down into specific and actionable goals. The limited detail will lead to confusion and uncoordinated approaches to the goals of the plan, particularly across the different local government areas.

The Regional Plan is being revised at a time where major release areas are putting further pressure on especially road transport capacity. The Plan should encourage the finalisation of integrated transport modelling and apportionment of future upgrade costs.

<u>Recommendation 8</u> – Apply a methodology to the actions within the Draft Plan to understand if they are realistic. This process is likely to identify that the actions need to more clearly defined, which in turn defines time frames, responsibilities, and resources.

8. Support green, local and active transport infrastructure initiatives

supports the delivery of packages of multiple small scale infrastructure packages to achieve urban outcomes in the Regional Plan such as reduced urban heat, improved open space or locally accessibility. These packages could be delivered at large scale above INSW evaluation thresholds and support growth. The Plan could nominate potential proponents (eg Development Corporations / Joint Organisations) to define and deliver these types of infrastructure packages.

9. Omission of Protecting Scenic Values from Plan's objectives

There is no objective relating to protecting the region's most scenically valued landscapes which is integral to ensuring: any development occurs in appropriate locations (without reducing scenic values); rural town settings are protected from poor looking development; infrastructure is sited to minimise scenic impacts; visually sensitive locations such as coastal edges are suitably planned; and that urban development does not result in continuing urban sprawl without green breaks (which is currently occurring in many parts of the region).

The 'regional vision' of the Plan refers to planning for tourism growth which is highly dependent upon maintaining the scenic landscape values that tourists are attracted to. It is recommended that an additional objective be included to 'Protect Scenic Landscapes and Values' with related strategies to include a need to identify important scenic values and landscapes.

10. Omission of Protecting Cultural and Heritage Values from Plan's objectives

The previous Hunter Regional Plan 2036 included Direction 19 – Identify and protect the region's heritage. This draft plan has no such objective which is a major gap.

11. Zero net carbon and increase resilience

strongly supports objective 6 and expects Regional Plans to play a clearer role in setting out how much of the task of carbon reduction (in tonnes) falls to the built environment sector in the Hunter region - and over what timeframe. Regional Plans should help establish a carbon budget by industry sector and nominate carbon reduction expectations for new development precincts.

The concept of strengthening resilience should be throughout the Plan. In relation to community resilience to natural hazards – there is an opportunity for clearer direction to prevent future development where risks from natural hazards (exacerbated by climate change) cannot be mitigated. The Regional Plan should also address where planned retreat and ongoing adaptive management should be considered.

12. Presentation of key moves

The document could outline the actions and objectives more clearly. It is suggested that the main actions and key pieces of information are drawn out and easily identifiable, rather than just within the body of the text. This allows the reader to see the most important pieces of information quickly. For example;

'Development proposals will reflect an urban density of 50-75 dwellings per hectare of developable land' (p.38).

This important goal should be included as a separate obvious statement in a box or design that brings attention to it and makes it easy to see when reading through the

document. The urban density aspiration should be related to how broader goals (eg for the amenity and accessibility) of the region would be achieved.

The Draft Plan includes new approaches to planning in the Hunter we have not previously seen before which we commend, however, further supporting information and actionable steps are required prior to the Draft Plans finalisation.

13. Further PIA involvement

Thank you again for the opportunity to provide comments on the draft Hunter Regional Plan 2041. Hunter Committee would be pleased to remain engaged.
If you have any queries about our submission, please don't hesitate to contact our or by email at
Yours sincerely

From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Wednesday, 2 March 2022 5:40:58 PM

Attachments:

Submitted on Wed, 02/03/2022 - 17:40

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info



Suburb/Town & Postcode

Sydney NSW 2000

Please provide your view on the project

I am just providing comments



attached PIA submission file.

I agree to the above statement

Yes

Submission

Draft Hunter Regional Plan 2041

March 2022

Prepared by



Revision	Details	Date	Author
0		03/03/2022	TK

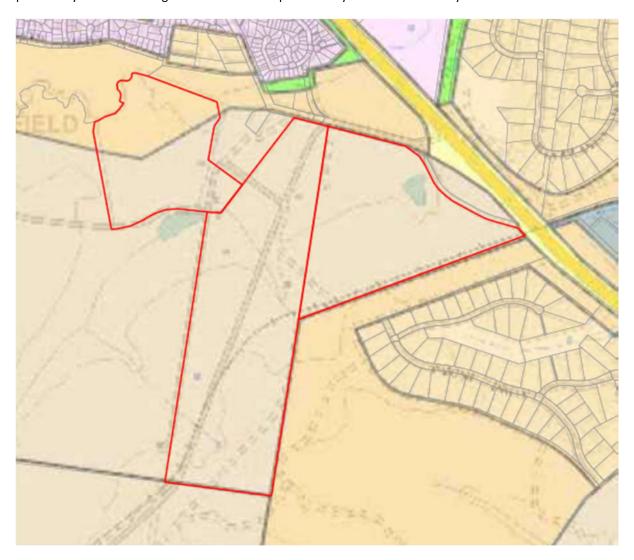
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1.0 Introduction

constitutes the landowners of Lot 2 DP1166603, Lot 30 DP577638 and Lot 101 DP616161 (outlined in red in the figure below).

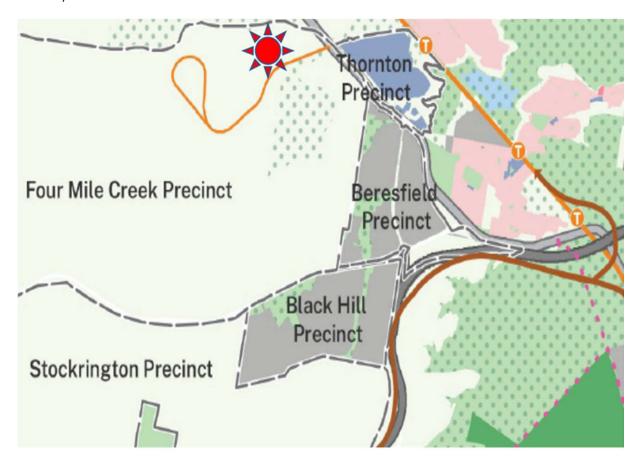
This submission, in response to exhibition of the Draft Hunter Regional Plan 2041 (DHRP), augments the preliminary submission lodged on the Partnership's behalf by Monteath and Powys dated 9th November 2021.



1.2. Purpose of this Submission

The purpose of this submission is to encourage the DPIE and Maitland City Council to build on existing planning strategies to establish the Ashtonfield Employment Urban Release Area (URA).

The extract from Figure 11 on Page 73 of the Draft Hunter Regional Plan 2041 (DHRP) (shown below) shows the general location of the proposed URA by a symbol. It illustrates that the site is at the interface between existing and developing Employment Precincts (Thornton, Beresfield and Black Hill) and a future employment area which has potential to access nationally significant road and rail infrastructure (the Four Mile Creek Precinct).



On Page 75, the DHRP states, in respect of the Four Mile Creek Precinct:

- Encourage employment uses that leverage the access and proximity to M1 Pacific Motorway or rail infrastructure, including freight, warehousing and logistics, and that complement nearby centres.
- Repurpose existing infrastructure to support transition to new uses.
- Conserve high environmental value lands.

2.0 Local Strategic Planning History

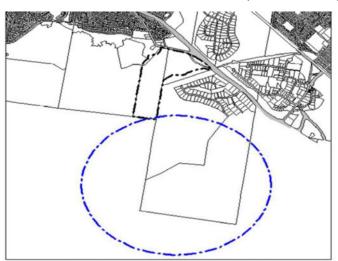
2.1. Criteria for Inclusion

Based on analysis of the various local strategic planning documents of Maitland City Council (MCC), the key criteria for including land as part of a land development strategy or program for either employment or residential purposes are:

- 1. Proximity to existing urban areas;
- 2. Suitability of land for its intended use, determined through analysis of factors including flooding potential; subsidence/geotechnical constraints; vegetation/ecology/habitat; agricultural potential; potential for land use conflict;
- 3. Efficiency and practicality of providing utility services;
- 4. Views of relevant government agencies e.g. DPIE and utility providers;
- 5. Land supply/demand in the locality.

2.2. Maitland Urban Settlement Strategy 2012 Edition (MUSS 2012)

An extract from Figure 20, page 111 of MUSS 2012 is below, showing the Thornton/Ashtonfield Preliminary Investigation Area. MUSS 2012 shows much of the Dudley Farm Partnership land as part of a Preliminary Investigation Area (outlined by black dashed line) adjoining the Stony Pinch Preliminary Investigation Area (blue dashed oval line) which includes land within and outside the boundary of Maitland City.



THORNTON/ASHTONFIELD PRELIMINARY INVESTIGATION AREA



The MUSS stated, on page 109, the following:

"Investigations will need to determine the suitability of the area for industrial land use, including consideration of land characteristics, constraints and market forces for the site."

2.3. Draft Local Urban Development Program 2019

In November 2019, a review of the MUSS was reported to Council which included "Ashtonfield / Thornton (Stony Pinch Group)" as a Preliminary Investigation Area.

Category 1 (0-5 years)	Category 2 (5-10 years)	Preliminary Investigation Area (10-20 yrs)
Thornton North Employment Land	Gillieston Heights (14 ha)	Lochinvar (south east) (186 ha)
Farley (80 lots)	Anambah Road R5 Large Lot Res (56 ha)	Maitland Vale (470 ha)
Anambah Employment Land	Farley (38 ha)	Lochinvar Fringe (west) (34 ha)
Aberglasslyn (Stage 2)	Lochinvar Fringe (R5) (151	Ashtonfield/Thornton
490 lots	ha)	Industrial (Stony Pinch Group) (600ha)
Metford Employment Land (Regional Hospital)	Bolwarra/Largs (91 ha)	Farley (95 ha)
Thornton North Stage 3 (200 dwellings)		Greta (39 ha)
Anambah URA (3500 lots)		Louth Park (west) (10 ha)
Gillieston Heights (south) (1000 Lots)		Louth Park (east) (16ha)
Urban Extension and Urban Infill Sites		
Mt Vincent Rd East Maitland (160 lots)		

2.4. Maitland Local Strategic Planning Statement (2020)

The Maitland LSPS adopted in mid-2020 does not include the Ashtonfield Investigation Area.

See below.

However, the LSPS outlines several actions that should lead to consideration of the site to host business and employment. See extract below. The table of actions includes the immediate preparation of an Economic Development Strategy and (short-term) a review of the Activity Centres and Employment Clusters Strategy 2010, an Industrial Land Audit and an industrial and Employment Lands Strategy.



7.	Strengthen our local economy through	a. Prepare an Economic Development Strategy.	Immediate	MCC, Local businesses
	attracting investments, creating jobs and fostering	b. Prepare a Destination Management Plan.	Immediate	MCC, Destination
	innovation.	c. Continue to implement MCC annual flagship events, in partnership with the other	Ongoing	NSW, Tourism industry
		stakeholders.		MCC, Local businesses
8.	Encourage vibrant and connected centres through a clearly defined centres hierarchy.	Review Activity Centres and Employment Clusters Strategy 2010 and prepare a new Centre Strategy.	Short term	MCC
9.	Ensure a suitable supply	a. Undertake an Industrial Land Audit.	Short term	МСС
	of industrial and urban service lands to meet future needs.	b. Prepare an Industrial and Employment Lands Strategy.	Short term	MCC
		Protect the existing and future industrial and urban services lands from encroachment by sensitive land uses.	Ongoing	MCC

Maitland Local Strategic Planning Statement 2040+

3.0 Recommendations

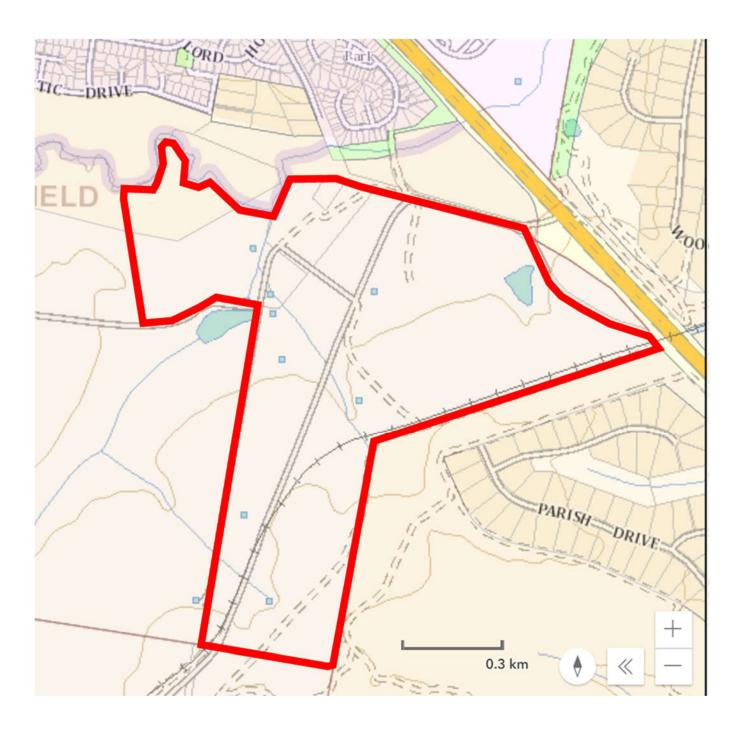
3.1. Local Industrial and Employment Lands Strategy

The area depicted below should be considered for inclusion in the Maitland Industrial and Employment Lands Strategy for the following reasons:

- 1. Close proximity to existing urban areas;
- 2. Suitability of the land for industrial use low slope; flood free; the land is not part of any Mining Lease nor is there any legacy of past mining; vegetation buffer to residential areas;
- 3. Efficiency and practicality of providing utility services land can be serviced by extension of adjacent utility services and land is accessible to major road network;
- 4. Views of relevant government agencies e.g. DPIE and utility providers. Consultation with DPIE confirms interest in giving strategic direction for the land's development. It is expected land can be serviced by all utility providers subject to "user pays" principles;
- 5. Land supply/demand in the locality. There is strong demand for employment land in the area and greenfield supply within Maitland is running low.

3.2. New URA

Due to demand and supply concerning employment land in Maitland, the some adjoining land (outlined below) should be designated as an additional "Catalyst Area" and / or part of the Lower Hunter Urban Development Program and as an area for Site Investigation. Within 2 years, following site investigations the area should be designated as an Employment Urban Release Area.



From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Thursday, 3 March 2022 9:04:32 AM

Attachments:

Submitted on Thu, 03/03/2022 - 08:46

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info

Suburb/Town & Postcode

2422

Please provide your view on the project

I am just providing comments

Submission file

Submission

The attached submission is made on behalf of the landowners identified in the submission. It proposes that certain land in Ashtonfield, in the City of Maitland be included in the final Hunter Regional Plan 2041 as an area for investigation and eventual development as an Employment Zone.

I agree to the above statement

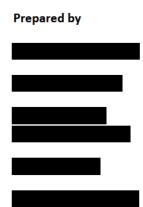
Yes

Submission

Draft Hunter Regional Plan 2041

Farley Urban Extension Site

March 2022



Revision	Details	Date	Author
0		03/03/2022	TK

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1.0 Introduction

The purpose of this submission is to encourage the DPIE and Maitland City Council to build on existing strategies to consider an expansion of the Farley URA. It is envisaged an expanded Farley URA of around 3,000 dwellings will create a viable "15-minute neighbourhood" within the "30 minute connected communities" advocated in the Draft Hunter Regional Plan 2041.

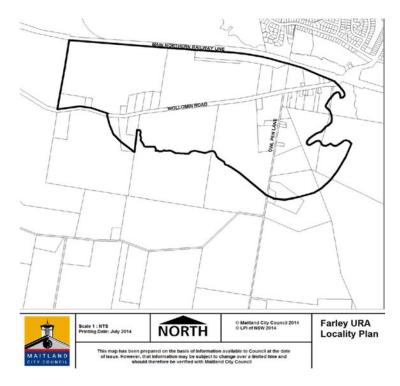
The Lower Hunter Regional Strategy (Department of Planning, 2006) identified the Farley Urban Release Area (URA), comprising 160 hectares as a regionally significant development area and a key site to achieve the dwelling targets for population growth in the Lower Hunter. The proximity of the Farley URA to regional transport systems including the New England Highway and the Hunter Expressway were key elements to the identification of this area for urban development.

Farley URA is within 10-15 minutes' drive of the Regional Centre of Maitland, Major Centre of Rutherford and the Rutherford / Anambah Employment Area.

The Development Control Plan and Development Contributions Plan for Farley Urban Release Area (URA) are based on an estimated yield of 1,500 residential lots. However, due to the number of small land parcels and multiple land ownerships, that yield is now estimated at 1,250 lots. The current number of residential lots sold, is approximately 500.

Demand for housing lots in Farley URA, based on actual sales 2019 – 2022 is estimated at 170 lots per annum. Should demand remain at current levels, the URA will be fully sold in another 4-5 years.

This short history of the development of the Farley URA illustrates the time that the land development process takes. It took over 10 years from strategic intent at the regional level for the first serviced residential lots to be sold.



2.0 Local Strategic Planning History

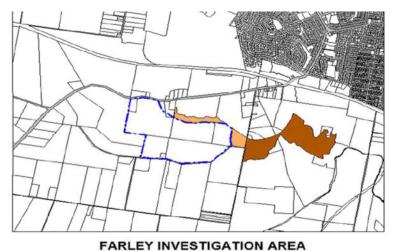
2.1 Criteria for Inclusion

Based on analysis of the various local strategic planning documents of Maitland City Council (MCC) the key criteria for including land as part of a land development strategy or program are:

- 1. Proximity to existing urban areas;
- 2. Suitability of land for residential use flooding potential; subsidence/geotechnical constraints; vegetation/ecology/habitat; agricultural potential; potential for land use conflict;
- 3. Efficiency and practicality of providing utility services;
- 4. Views of relevant government agencies e.g. DPIE and utility providers;
- 5. Land supply/demand in the locality.

2.2 Maitland Urban Settlement Strategy 2012 Edition (MUSS 2012)

MUSS 2012 shows potential expansion of the Farley URA to the south. An extract from Figure 12, page 86 of MUSS 2012 is below, showing Category 1, 2 and the Preliminary Investigation Area.



Scale 1 : 25 000
Printing Date: October 2013

NORTH

D. Mailtund City, Council 3011
D. PMA of NSW 2011

Category 2 - Residential
D. Preliminary Investigation Area

URBAN SETTLEMENT STRATEGY
Should Discretic be verified with Mailtand
2012 EDITION

The MUSS stated, on page 85, the following:

"Farley URA is quite extensive in size and, therefore, the development of that land would be likely to occur prior to any development within the Category 2 Investigation Area. As such, the timeframe for development within the Preliminary Investigation Area (+10 years) is considered appropriate."

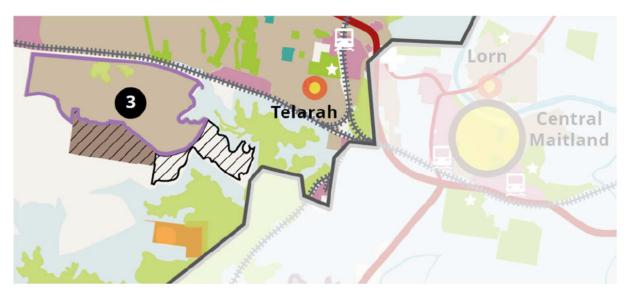
2.3 Draft Local Urban Development Program 2019

In November 2019, a review of the MUSS was reported to Council which included Farley as having Category 1 land (0-5 years) as 80 lots, Category 2 (38 hectares) and Preliminary Investigation (95 hectares).

Category 1 (0-5 years)	Category 2 (5-10 years)	Preliminary Investigation Area (10-20 yrs)
Thornton North Employment Land	Gillieston Heights (14 ha)	Lochinvar (south east) (186 ha)
Farley (80 lots)	Anambah Road R5 Large Lot Res (56 ha)	Maitland Vale (470 ha)
Anambah Employment Land	Farley (38 ha)	Lochinvar Fringe (west) (34 ha)
Aberglasslyn (Stage 2) 490 lots	Lochinvar Fringe (R5) (151 ha)	Ashtonfield/Thornton Industrial (Stony Pinch Group) (600ha)
Metford Employment Land (Regional Hospital)	Bolwarra/Largs (91 ha)	Farley (95 ha)
Thornton North Stage 3 (200 dwellings)		Greta (39 ha)
Anambah URA (3500 lots)		Louth Park (west) (10 ha)
Gillieston Heights (south) (1000 Lots)		Louth Park (east) (16ha)
Urban Extension and Urban Infill Sites		
Mt Vincent Rd East Maitland (160 lots)		

2.4 Maitland Local Strategic Planning Statement (2020)

The Maitland LSPS adopted in mid-2020 shows that the former Category 1 and 2 lands and part of the Preliminary Investigation Area included. See LSPS extract below.







Planned Investigation Area	The 'planned investigation' category included land that has been identified in the Maitland Urban Settlement Strategy as 'category 1' investigation area for future residential or employment purposes.
Future Investigation Area	The 'future investigation' category included land that has been identified in the Maitland Urban Settlement Strategy as 'category 2' investigation areas where detailed studies and investigations are required to confirm their suitability for future development and this land would logically be developed after 'category 1' lands.

3.0 Recommendation

3.1 Draft Maitland Local Housing Strategy

At the time of this Submission, it is understood that exhibition of the Draft Maitland Local Housing Strategy is imminent.

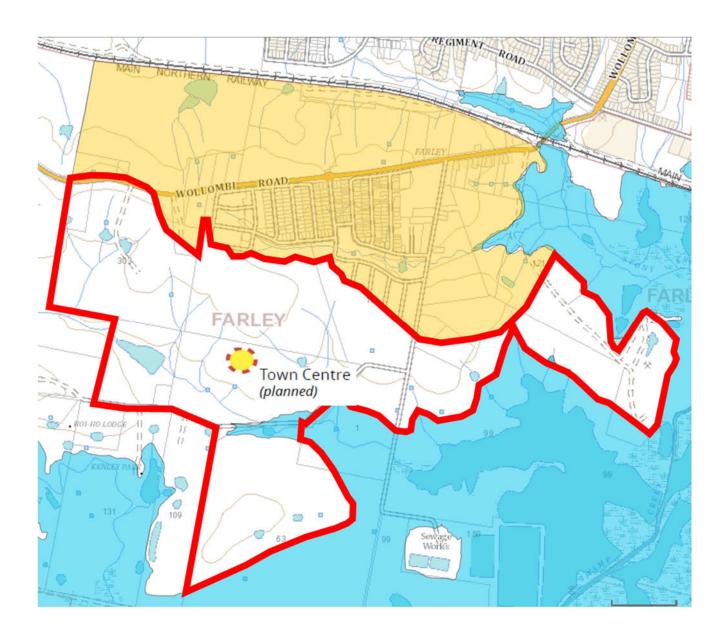
Based on the stated objectives of the Strategy, announced in the LSPS, an expansion of the Farley URA should be included for the following reasons:

- 1. Close proximity to existing urban areas;
- 2. Suitability of land for residential use flooding potential is known and allows for land for development; subsidence/geotechnical constraints are not present/expected (like developed land in the vicinity); vegetation/ecology/habitat habitat can be maintained and managed as part of development; agricultural potential land has limited agricultural potential (grazing). There is significant grazing land available in the locality and beyond; potential for land use conflict the Wentworth Swamps WWTP is a modern facility and managed to avoid adverse impacts;
- 3. Efficiency and practicality of providing utility services land can be serviced by extension of adjacent utility services and land is accessible to distributor road network. Upgrading of intersections at NEH will increase the capacity of the road system. A comprehensive planning exercise, covering an expanded URA will address servicing. It is expected land can be serviced by all utility providers subject to "user pays" principles;
- 4. Views of relevant government agencies e.g. DPIE and utility providers. Consultation with DPIE confirms that expansion of the URA is regarded as a local matter;
- 5. Land supply/demand in the locality. There is strong demand for housing in the area and greenfield supply is expected to be exhausted in 4-5 years;
- 6. Provides the opportunity to create a viable residential community of a scale to support a town centre with a mix of commercial, retail, community and recreation facilities.

In summary, suitable land adjoins Residential zoned greenfield land that has been or is under development. The land includes land classified by Maitland City Council for Investigation in the LSPS.

3.2 Extended Urban Release Area (URA)

It is recommended that DPIE and Council include the area outlined in red in the figure below as an Investigation Area leading to the area becoming an Urban Release Area and subject to the appropriate zoning and development controls.



From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Thursday, 3 March 2022 9:19:38 AM

Attachments:

Submitted on Thu, 03/03/2022 - 09:14

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info



Suburb/Town & Postcode

2422

Please provide your view on the project

I am just providing comments

Submission file

Submission

This submission is made on behalf of some landowners affected by the recommenda ion in the submission. The submission recommends that the Farley Urban Release Area, in the City of Maitland be substantially enlarged to facilitate creation of a properly serviced local community.

I agree to the above statement

Yes

Submission

Draft Hunter Regional Plan 2041

March 2022

Prepared by



Revision	Details	Date	Author
0		03/03/2022	TK

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1.0 Introduction

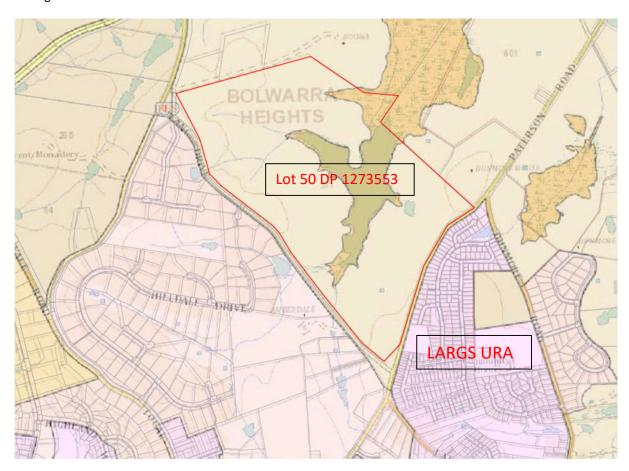
1.1. Land the Subject of this Submission

Lot 50 DP 1273553, 511 Paterson Road, Bolwarra Heights

Area - 91 hectares.

Zoning - RU1 and C2 Maitland LEP 2011

See figure below.



1.1. Purpose of this Submission

The purpose of this submission is to encourage the DPIE and Maitland City Council to address shortfall in supply of greenfield residential land in the Bolwarra Heights / Largs area and establish a new Urban Release Area (URA).

1.2. Locality

Bolwarra Heights is a suburb in the City of Maitland in the Hunter Region of New South Wales, Australia. It is located on the eastern side of the Hunter River, approximately 5 km north of the Maitland Central Business District. Mainly a residential suburb, Bolwarra Heights is bordered to the east by Largs.

2.0 Local Strategic Planning History

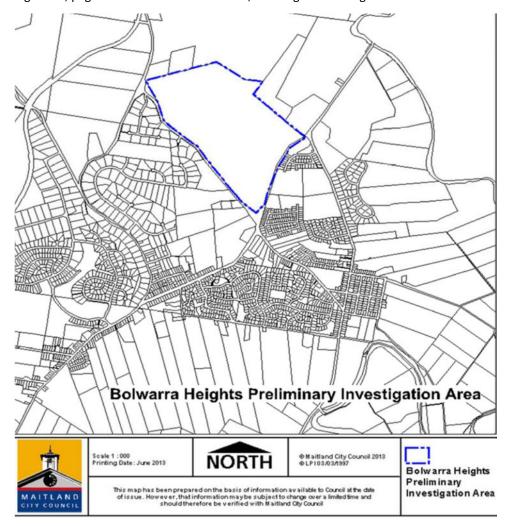
2.1. Criteria for Inclusion

Based on analysis of the various local strategic planning documents of Maitland City Council (MCC) the key criteria for including land as part of a land development strategy or program are:

- 1. Proximity to existing urban areas;
- 2. Suitability of land for residential use, including flooding potential; subsidence/geotechnical constraints; vegetation/ecology/habitat; agricultural potential; potential for land use conflict;
- 3. Efficiency and practicality of providing utility services;
- 4. Views of relevant government agencies e.g. DPIE and utility providers;
- 5. Land supply/demand in the locality.

2.2. Maitland Urban Settlement Strategy 2012 Edition (MUSS 2012)

Lot 50 was included in MUSS 2012 as the "Bolwarra Heights Preliminary Investigation Area". An extract from Figure 23, page 118 of MUSS 2012 is below, showing the Investigation Area.



The MUSS stated, on page 117, the following:

The Bolwarra Heights Preliminary Investigation Area is shown in Figure 23. The Largs URA is positioned immediately east of the site, beyond Paterson Road. The eastern portion of the site is relatively cleared and appears to have few constraints to development, subject to future investigations.

The presence of Dunmore House immediately north-east of the site means that any future investigations on this land would require significant analysis of heritage values of the area.

Traffic and access issues were critical issues to resolve as part of the development of the Largs URA. The land retains access from both Paterson Road and Lang Drive, however, based on previous advice from the RMS for the Largs URA, access from Paterson Road would not be permitted.

The presence of a natural wetland within the centre of the site means that the land is divided into two distinct areas. The land is impacted significantly by flooding in a 1% AEP flood event. While some land is flood free in the western portion of the site, this land is heavily constrained by the presence of Endangered Ecological Communities. The PIA boundary encompasses the whole of the property to provide for a holistic site analysis approach when considering the land for future land use outcomes.

2.3. MUSS Review (March 2016)

Council undertook a review of the MUSS in 2015/2016 and this review was the subject of a report to Council's meeting of 22nd March 2016. On pages 136 – 138 the land the subject of this submission was addressed. At that time the subject land was identified in the MUSS as "Category 2 – Rural Transition". Category 2 implied a 10-15 development timeframe for the land. A request had been made to progress the land to Category 1, enabling the submission of a Planning Proposal (rezoning) to be considered.

Council subsequently resolved to maintain the Category 2 designation based on an assessment of supply and demand factors at that time. At that time, the amount of land zoned for residential development in the Largs / Bolwarra heights area was estimated at 17.78 hectares or a potential yield of 177 residential lots. Demand was estimated at 34 lots and 17 dwellings per annum.

At the time of lodging this submission, approximately 15 hectares of the 17.78 hectares has been fully developed and only a minor number of lots remain to be taken up. Most importantly, there is no active URA precinct in the Bolwarra Heights / Largs locality to provide opportunity for new home and land buyers to locate to this highly desirable locality.

2.4. Draft Local Urban Development Program 2019

In November 2019, a review of the MUSS was reported to Council which again included Lot 50 as part of the proposed Local Urban Development Program (LUDP) as a Category 2 site. The draft LUDP as proposed is displayed below, suggesting development of within a five-year timeframe (2024 – 2029).

Category 1 (0-5 years)	Category 2 (5-10 years)	Preliminary Investigation Area (10-20 yrs)
Thornton North Employment Land	Gillieston Heights (14 ha)	Lochinvar (south east) (186 ha)
Farley (80 lots)	Anambah Road R5 Large Lot Res (56 ha)	Maitland Vale (470 ha)
Anambah Employment Land	Farley (38 ha)	Lochinvar Fringe (west) (34 ha)
Aberglasslyn (Stage 2) 490 lots	Lochinvar Fringe (R5) (151 ha)	Ashtonfield/Thornton Industrial (Stony Pinch Group) (600ha)
Metford Employment Land (Regional Hospital)	Bolwarra/Largs (91 ha)	Farley (95 ha)
Thornton North Stage 3 (200 dwellings)		Greta (39 ha)
Anambah URA (3500 lots)		Louth Park (west) (10 ha)
Gillieston Heights (south) (1000 Lots)		Louth Park (east) (16ha)
Urban Extension and Urban Infill Sites		
Mt Vincent Rd East Maitland (160 lots)		

In terms of meeting the 2024 timeline as originally projected by MCC, the land should be formally included in the Hunter Regional Plan and subsequent MCC Local Housing Policy, to enable a formal Planning Proposal to be lodged.

2.5. Maitland Local Strategic Planning Statement (2020)

The Maitland LSPS adopted in mid-2020 does not include Lot 50 as part of the Structure Plan. See below.



However, based on the LSPS' definition of "Planned Investigation Area (Residential)", the site qualifies as a Future Investigation Area.

Future Investigation Area

The 'future investigation' category included land that has been identified in the Maitland Urban Settlement Strategy as 'category 2' investigation areas where detailed studies and investigations are required to confirm their suitability for future development and this land would logically be developed after 'category 1' lands.

3.0 Recommendations

3.1. Draft Maitland Local Housing Strategy

At the time of this Submission, it is understood that exhibition of the Draft Maitland Local Housing Strategy is imminent.

Based on the stated objectives of the Strategy, announced in the LSPS, the land depicted in red outline below should be included as a future housing area for the following reasons:

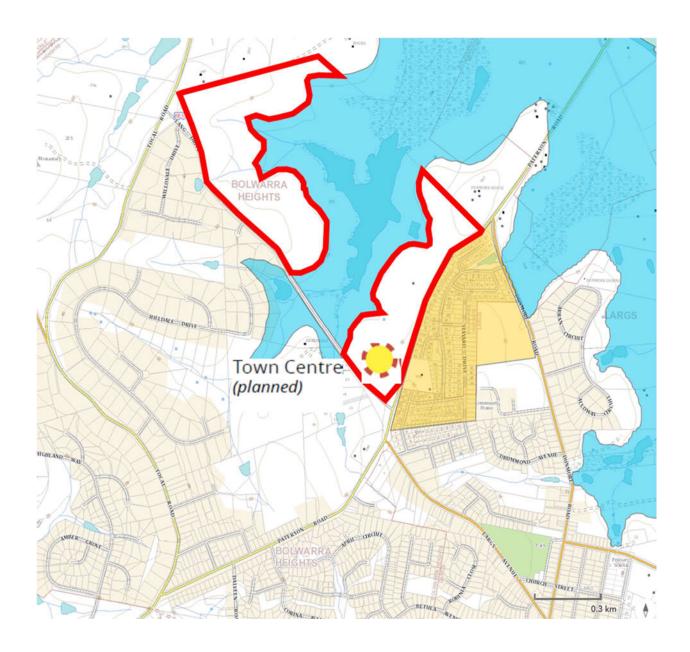
- 1. Close proximity to existing urban areas;
- 2. Suitability of land for residential use flooding potential is known and allows for land for development (estimated at 50 hectares); subsidence/geotechnical constraints are not present/expected (similar to developed land in the vicinity); vegetation/ecology/habitat habitat can be maintained and managed as part of development; agricultural potential land has limited agricultural potential (grazing). There is significant grazing land available in the locality and beyond; potential for land use conflict no other land uses that would conflict with residential. Heritage concerns with Dunmore House can be managed through design e.g. building setbacks;
- 3. Efficiency and practicality of providing utility services land can be serviced by extension of adjacent utility services and land is accessible to distributor road network;
- 4. Views of relevant government agencies e.g. DPIE and utility providers. Consultation with DPIE confirms that rezoning regarded as a local matter. It is expected land can be serviced by all utility providers subject to "user pays" principles;
- 5. Land supply/demand in the locality. There is strong demand for housing in the area and greenfield supply is exhausted. This appears to be a result of consistently "rolling back" the subject land from being considered as the subject of a Planning Proposal over the last 7 years, despite prediction in Council's own reports that only 5.2 years supply was available.

In summary, the land lies adjacent to Residential and Large Lot Residential greenfield land that has been developed. The land was classified by Maitland City Council as Preliminary Investigation in the MUSS 2012. In 2019, Council planners included the site as "Category 2" before the Council published its Local Strategic Planning Statement in 2020. By the definition contained in the LSPS, the site should be reinstated as a "Future Investigation Area".

3.2. New Urban Release Area (URA)

The DHRP does not set out specific terminology to guide the nomination of sites as URA precincts. In this context, it is recommended that Council and the DPIE include the area depicted below as an immediate/short term (0-5 years) Investigation Area which will provide a level of certainty to proceed with the necessary Planning Proposal leading to the definition of a Bolwarra Heights URA within 2 years and land and housing development in 3-4 years.

The new URA could also potentially host a new centre which Council's Maitland Centres Strategy (Revised) 2016 recommends be established in the locality.



From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Thursday, 3 March 2022 9:29:29 AM

Attachments:

Submitted on Thu, 03/03/2022 - 09:25

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info



Suburb/Town & Postcode

2422

Please provide your view on the project

I am just providing comments

Submission file

Submission

This submission is made on behalf of a client. The submission recommends that at Bolwarra Heights, in the City of Maitland an area be designated for investigation with the intention of creating an Urban Release Area for residential community purposes.

I agree to the above statement

Yes

Submission

Draft Hunter Regional Plan 2041

March 2022

Prepared by



	Details	Date	Author
0		03/03/2022	ТК

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1.0 Introduction

1.1. Property Description

See Figure 1 below.

The land is described as Lot 7 DP 829150, Morpeth.

The land has an area of 24.47 hectares. It has a main frontage to Little James Street and a narrower frontage John Street. The land is connected to James Street from George Street.

The land has been cleared and used for grazing in the past. A total of seven (7) trees are found in the upper (northern) portion of the land. The land slopes low to moderate from the north (adjoining Little James Street) to the south.

The area of the land that is above the 1 in 100 Average Recurrence Interval (ARI) level is 8.7 hectares. In the southern section that is flood liable, the land contains part of a natural lagoon that is zoned Environmental Conservation.

The land adjoins or is adjacent to residential lots containing detached houses to the northern and eastern boundaries. The western boundary is to rural land containing a dwelling-house. Rural land is to the south and south-east, the Morpeth Wastewater Treatment Plant to the south-west.

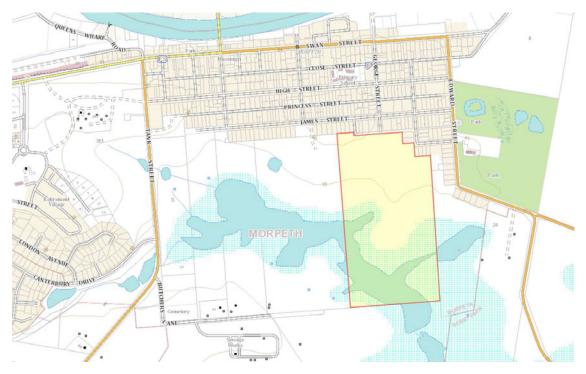


Figure 1 - Locality Plan Lot 7 DP 829150

(Source: Six Maps)

1.2. Zoning

The land is zoned RU2 Rural Landscape and E2 Environmental Conservation under the provisions of Maitland Local Environmental Plan (LEP) 2011. Only the area zoned RU2 will be subject to development.

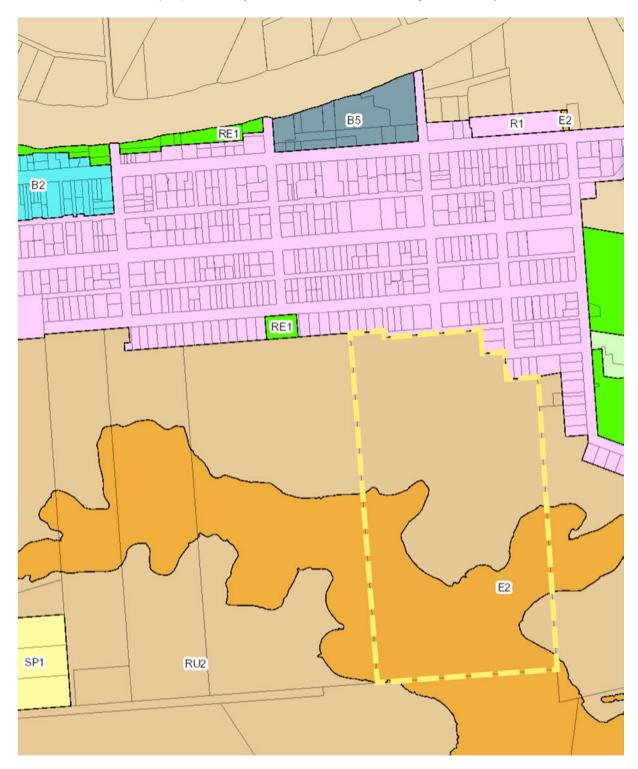


Figure 2 – Lot 7 DP 829150 Land Use Zoning (Maitland LEP 2011)

(Source: ePlanning Spatial Viewer 2019_11-14)

2.0 Local Strategic Planning

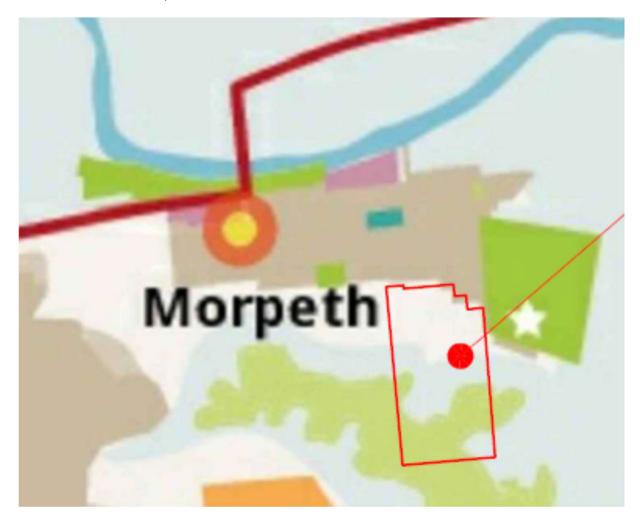
2.1.1. Criteria for Inclusion

Based on analysis of the various local strategic planning documents of Maitland City Council (MCC) the key criteria for including land as part of a land development strategy or program are:

- 1. Proximity to existing urban areas;
- 2. Suitability of land for residential use flooding potential; subsidence/geotechnical constraints; vegetation/ecology/habitat; agricultural potential; potential for land use conflict;
- 3. Efficiency and practicality of providing utility services;
- 4. Views of relevant government agencies e.g. DPIE and utility providers; and
- 5. Land supply/demand in the locality.

2.1.2. Local Strategic Planning Statement

The site is not addressed by the Maitland LSPS. See below.



3.0 Recommendations

3.1. Draft Maitland Local Housing Strategy

At the time of this Submission, it is understood that exhibition of the Draft Maitland Local Housing Strategy is imminent.

Based on the stated objectives of the Strategy, announced in the LSPS, the site should be included for the following reasons:

- 1. Close proximity to existing urban areas;
- 2. Suitability of land for residential use flooding potential is known and allows for land for development (estimated at 10 hectares); subsidence/geotechnical constraints are not present/expected (similar to developed land in the vicinity); vegetation/ecology/habitat no significant habitat on the development site and wetlands would be protected); agricultural potential land has limited agricultural potential (grazing). There is significant grazing land available in the locality and beyond; potential for land use conflict no other land uses that would conflict with residential.
 - The site is within the Morpeth Conservation Area. A Statement of Heritage Impact (SOHI) completed in 2020, relating to proposed residential development of the subject land concluded that such development is not detrimental to the cultural significance of the Conservation Area;
- 3. Efficiency and practicality of providing utility services land can be serviced by extension of adjacent utility services and land is accessible to adjoing road network;
- 4. Views of relevant government agencies e.g. DPIE and utility providers. Consultation with DPIE confirms that rezoning regarded as a local matter. It is expected land can be serviced by all utility providers subject to "user pays" principles;
- 5. Land supply/demand in the locality. There is strong demand for housing in the area and greenfield supply is exhausted.

3.2. New Urban Release Area (URA)

It is recommended that DPIE and Council include the area outlined in red in the figure below as an Investigation Area leading to the area becoming an Urban Release Area and subject to the appropriate zoning and development controls.



From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Thursday, 3 March 2022 9:36:13 AM

Attachments:

Submitted on Thu, 03/03/2022 - 09:33

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info

Suburb/Town & Postcode

2422

Please provide your view on the project

I am just providing comments

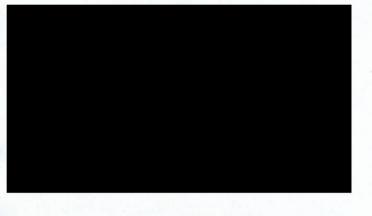
Submission file

Submission

. The submission recommends that land in Morpeth, in the City of Maitland be designated for investigation with the inten ion of creating a Morpeth Urban Release Area for residential community purposes.

I agree to the above statement

Yes



3rd March 2022

NSW Department of Planning & Environment

To whom it may concern.

The land north of the railway line, south of the New England Highway would be suitable for residential, and/or rural residential land uses which will support the planning for employment and the future NSW Hydrogen Strategy roadmap (2021-2040) and priorities focused on future strategic planning.

The land has a panorama view allowing the flow of natural clean air quality. A natural formed pinnacle site position which would merit to deliver any proposed community estate or 15-minute neighborhood region. An important feature to this land position is the direct connection it has to offer with its character, sense of identity, purpose and belonging. Close to vineyards, skilled industry growth, easy access, all to which will benefit economic growth with proximity associated with services and contingency plans for employment growth.

Additional opportunities to increase and protect job security. As for small business, health care and corporate companies they will not be deprived of staff shortages or business interruptions allowing for continuation of reliable and functional employment to be achieved. Site selection and site layout will strive to build a strong financial region, skilled industry growth, employment and services in accessible locations close to public transport and expressways.

We would ask that the Hunter Draft Regional Plan take into consideration our submission towards the benefits that residential and/or rural residential land use will contribute towards future growth potential for working, education, recreation, health care and entertainment.



From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Thursday, 3 March 2022 9:53:05 AM

Attachments:

Submitted on Thu, 03/03/2022 - 09:51

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info

Suburb/Town & Postcode

CECIL HILLS

Please provide your view on the project

I object to it

Submission

Please see attached file

I agree to the above statement

Yes



03 March 2022

General Manager
NSW Dept. of Planning, Industry & Environment

Dear Sir/Madam,

Submission: Draft Hunter Regional Plan 2041

I am writing this letter with regards to the East Maitland Catalyst Area which is referenced throughout the *Draft Hunter Regional Plan 2041*.

I understand that the objectives for this strategic centre will be to increase the growth of health, retail and economic services along with increased housing supply. The future rezoning of the current Metford industrial precinct will be a key opportunity for these objectives to be met in order to service the recently opened Maitland Hospital and the local needs. The NSW Department of Planning should work closely with Maitland City Council and the affected landowners in order to have these properties rezoned appropriately to compliment the growth of the area.

Suggested permitted uses for any future rezoning of the Metford industrial precinct should consider the likes of *Tourist and Visitor Accommodation* and *Food and Drink Premises* which is currently permissible on the land directly opposite the new Maitland Hospital on Metford Road and Turton Street.

If you wish to discuss my above comments, please contact me via my details below.



From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Thursday, 3 March 2022 10:06:40 AM

Attachments:

Submitted on Thu, 03/03/2022 - 10:03

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info



Suburb/Town & Postcode

Pennant Hills

Please provide your view on the project

I support it



Submission

Please find the attached submission on the DHRP2041. This submission is in relation to the East Mai land Catalyst Area and provides suggestions to the future rezoning of he Metford industrial precinct.

I agree to the above statement

Yes

3 March 2022

Department of Planning, Industry and Environment PO BOX 1226, Newcastle NSW 2300 Also submitted online

Dear Sir/Madam,

Our

Submission	in relation	to the	Draft Hunter	Regional	Plan 2041
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known as and trading by the name \ appreciates the opportunity to provide this submission to the Department of Planning, Industry and Environment (DPIE) on the Draft Hunter Regional Plan 2041 (HRP). **About the Service** which provides The Service is a r throughout Northern NSW for the under a long term contract with the NSW government through the The majority of services are provided to the Central Coast, Newcastle and Hunter Valley regions, Tamworth and New England areas, Lismore through Tenterfield and to the west and to the Queensland border. Services are also provided offshore as required. From time to time, the Service provides services further south into Sydney and north into southern Queensland. The Service operates 24 hours per day, every day of the year from ocated within The Service operates with a joint funding model from the and The Service is a c which holds monies and assets on trust for members of the public resident in the regions set out in our

 Pre-hospital missions – response to Triple 0 emergency calls to assist people injured in locations such as roads, farms, workplaces, the ocean, on sporting fields or in the bush.

three types of r

- Inter Hospital Transfers (IHT) transfer the states most critical patients to the appropriate standard of specialist hospital care required.
- Search and Rescue Missions search to locate missing people and return them to safety.

In addition to the line bases mentioned above, the Service also has a f

The as the Service's headquarters and engineering/deep level
maintenance facility. The Service leases the majority of the land for the
long-term lease. The has been used by the Service for more than 30 years.
The following functions, which are critical to the provision of the broader services provided by the Service, are carried out at the
 Deep Level Maintenance (DLM) – DLM is performed on the DLM is in depth maintenance that is beyond the capability or approvals of maintenance facilities at the line bases. This includes disassembly, inspection, repair, re-assembly, repainting, component maintenance and flight testing including 80 foot hover checks and rotor track and balance flights in part of District Park.
Due to the inspection and maintenance requirements of the complex is a maintenance event at Broadmeadow for between 36 to 42 weeks of the year. The remainder of the year, the Service's back-up aircraft is based at Broadmeadow as a backup for line bases or for training.
Also located at state of the main store containing aeronautical parts and consumables for onsite maintenance and to support operational bases located at Belmont, Tamworth and Lismore. In addition the Broadmeadow Engineering facility houses essential support staff including technical services, responsible for ongoing airworthiness of the fleet, fleet planning staff, engineering training and quality staff. Regular truck movements down Bavin Road and into and out of the Broadmeadow Base support the transfer of critical parts between the four bases.
• Training – Block Medical Crew training is conducted from the Broadmeadow Base over a 4 week period every February and August. This training involves a 2 week period of Ab initio (from the beginning) doctor training, one (1) week of Hi-Line/water winch training, and another week for re-current doctor training. This training is conducted on the 4 th (back-up) aircraft during these periods involving aircraft movements into and out of the base. Throughout the year the line was a used for various ad hoc flight crew training missions.
 Instrument Approach – the Broadmeadow Base has an approved GNS RNAV (Global Navigation System Area Navigation). This provides instrument approach in bad weather as an alternate landing site to the Belmont operational base or John Hunter Hospital.
 Refueling – Operational aircraft from Tamworth and Lismore refuel at Broadmeadow 2-3 times per week. This facility is also utilised by on a regular basis for refueling for police missions in Newcastle and the Hunter Region.
 Marketing, Sponsorship and Hospitality – To contribute to its funding, the Service conducts fundraising activities across northern NSW, including the Hunter Region. The

Base accommodates the marketing, fundraising and communications team for the Hunter Region and Northern NSW in predominantly administrative roles. External stakeholders including sponsors, media, volunteers and community supporters also attend the facility for meetings and functions. There is an onsite Visitors Centre utilised for hospitality of small and medium sized groups.

 Administration – Support staff are located at the necessary administrative functions of finance, human resources, safety, administration, ICT support, legal support and facilities management.
The Draft HRP and the
The draft HRP flags Broadmeadow as a regionally significant growth area noting it "will become a community-led, nationally significant sport and entertainment precinct for greater Newcastle and the Hunter. Broadmeadow can become an employment and residential centre that capitalises on public investment in transport, potential future light rail connections, Hunter Park and advanced manufacturing and supporting sports medicine businesses and creative industries in the area."
As noted above the District Park and forms part of the Broadmeadow regionally significant growth area and the proposed Hunter Park shown in the renders for the Broadmeadow area illustrated in Figure 9 of the HRP (Figure 9).
Impacts of the Draft HRP on the Service's Operations
Adoption of the HRP in its current form will have a significant impact on the Service's operations and services provided to the public for the reasons set out below.
No Provision for the
Unlike the earlier version of the masterplan contained in 'A Vision for the Hunter Sports and Entertainment Precinct' issued by Venues NSW in 2017 which recognised the existing location of the in the proposed concept plan, the E
in the HRP. Instead, the current location of the Service's to be designated as public open space with an indicative light rail station, and an opportunity for a pedestrian boulevard. Existing newer facilities like the Knights Centre of Excellence continue to be recognized in Figure 9 of the Draft HRP.
As noted above, the Service currently has a long-term contract in place with the New South Wales government to provide and a long-term lease to operate from the
The functions carried out at the land and described on pages 2 and 3 of this submission are essential to the Service delivering on its obligations under the NSWA Contract and to

being able to provide it's lifesaving services to the communities of northern New South Wales.

Incompatible Development in Close Proximity to the			
Figure 9 of the Draft HRP suggests that a proposed pedestrian walkway and light rail station could either encroach on or be built very close to the existing location of the Service's			
To the extent that any such infrastructure is located on land currently used by the Service, this would preclude the Service's ability to continue to use that land for its current purposes impacting the ability of the Service to provide its services.			
As noted above, the Service continues to use the range of activities including flying in and out of the base, maintenance and training flights. Helicopter flying operations can successfully co-exist with public use developments, however it is important for aviation and public safety to ensure an appropriate buffer zone remains clear of obstructions and public use to provide a "buffer" between helicopter operations and people and property. The buffer zone provides protections against the following:			
• Downwash Impacts: The effects of main rotor downwash and dust, particularly during take- off, landing and check flight activities can be considerable. It can produce strong gusts capable of blowing people over, raising loose objects into the air and damaging infrastructure. The impact of downwash is unpredictable as it can be effected by environmental factors such as wind. However the impact does reduce with increased distance from the whilst it is in operation. In these circumstances the larger the buffer zone between operations and infrastructure and people the better.			
• Obstructions: Increased infrastructure within helicopter flight paths can create a flight safety risk by increasing obstructions in the flight path and the need for out complex manoeuvres on take-off and landing to avoid them. Again, having an appropriately sized buffer zone free of such obstructions improves the safety of flight operations.			
The pedestrian boulevard and light rail station proposed in Figure 9 of the Draft HRP would result in the presence of significant public infrastructure including buildings, electrical power wires to operate the tram and lighting in an area in very close proximity to the flying operations conducted at the Service's increasing the obstruction aviation risk and giving rise to the property damage risk mentioned above. These developments would also draw members of the public to an area used for flight operations increasing the risks to people arising from downwash as discussed above. The current version of the Draft HRP does not appear to provide the necessary "buffer zone" between helicopter operations and public use infrastructure.			
For these reasons the Service considers that this aspect of the Draft HRP is inconsistent with the Service's current use of the site. In the event the proposed infrastructure was situated in the location proposed in the Draft HRP, this would significantly curtail flying operations at the which would in turn materially and adversely affect the ability of the Service to			

provide medical transport across New South Wales as required by the
In addition to the above, impacts through the construction period and any other development surrounding the should be carefully considered to ensure it is compatible with the safe and efficient running of operational aircraft.
In Conclusion
The Service has a strong connection with the Hunter built through many years of providing critical emergency health care services and engaging in community fundraising across the region. With operational service locations in both and fundraising activities conducted throughout the Hunter, this important region is and is planned to be for years to come, a critical part of the life-saving services provided every day by the Service to the whole of northern NSW.
While the Service supports the development of a nationally significant sport and entertainment precinct at this precinct must, as flagged by the draft HRP, be developed in a manner that respects existing land uses in this area.
The draft HRP in the form currently on exhibition, and in particular the plans for development at District Park Broadmeadow as currently proposed in the Draft HRP are inconsistent with the Service's current operations at and have the potential to adversely impact the provision of Hamiltonian provision.
The Service submits that as the provider of a critical emergency service that benefits the communities of northern NSW, and an existing, long-term user of land in the Broadmeadow precinct, it is in the public interest for the planning and development of the Broadmeadow precinct to occur in a manner that does not negatively impact the continuity, efficiency or
We would welcome the opportunity for further consultation with relevant government stakeholders and to be involved in the master planning process for the Broadmeadow precinct to ensure the continued success of the Service's current operations and further developments of the precinct.
We thank you for the opportunity to make this submission.

From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Thursday, 3 March 2022 10:55:21 AM

Attachments:

Submitted on Thu, 03/03/2022 - 10:50

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info

Suburb/Town & Postcode

Broadmeadow 2291

Please provide your view on the project

I am just providing comments

Submission file

Submission

The attached letter contains the submission of welcome the opportunity to discuss our submission further. on the draft Hunter Regional Plan 2041. We would

I agree to the above statement

Yes



To whom it may concern.

I would like to put forth my concerns with developments in the coastal areas of NSW and the Hunter area.

I have some key issues of concern regarding over development that I have seen firsthand in The Hawks Nest/Tea Gardens area of recent with large scale inappropriate development being pushed through.

Most of these developments do not meet the zoning requirements for the land in question yet have been approved by council or the land and environment court against community advice.

This needs to change, if a development does not fit the zoning criteria it should not be considered.

Key issues:

- Bulk and Scale of proposed developments.
- Exceeding heights to put in extra living space making these developments four stories.
- Reduced setbacks.
- Removal of native fauna and flora (Koala trees for which we have had a massive decline).
- Not enough car parking on property.
- Not enough boat and trailer parking on property.
- Traffic congestion.
- Not building to the aesthetics of the town.

Suggestions:

- Three stories restriction, no living on the fourth floor.
- No reduced setbacks.
- Parking accommodating to the amount of people per unit eg 2 car spots for 2 or 3 bedroom apartments not 1 ½.
- Trailer and boat parking for each unit.
- Tree plantings for our Koala Corridors and other wildlife.
- Timber fences for the wildlife.
- Our infrastructure is restricted, shouldn't the town have a limit, therefore not exceeding capacity.
- Build to suit the aesthetics of our seaside village.
- More houses on decent blocks of land for families with their toys (boats, bikes etc).
- Possible look into our council to ensure no corruption is happening.

Below are only some of the examples of DA's that have exceeding zoning requirements:

Yamba/Booner Street Development DA283/2019

- Stage 1 Three blocks of land.
- 31 units, 45 carparking spots, no boat parking.
- 4 stories high.
- Reduced setbacks.
- Removal of Koala trees and blocking part of the koala corridor.
- Underground car parking, possible water issues.

Marine Drive Development DA2021/2128

- Two Zonings B1 and R2 both exceeding heights to 5 stories high.
- Insufficient boat parking.
- Underground parking on a river front with rising water and floods due to high king tides.
- Historic building torn down.

32 Yamba Street Development DA2021/2374

- 4 stories high.
- 2 x shop small shop spaces, 10 units.
- No boat parking.
- Probably the only block of land to have commercial built on it but only building 2 x small shops, could do with a larger premises for restaurant.
- Removal of over 18 gum trees (all trees on property).

1 Sanderling Avenue Hawks Nest rezoning of Aboriginal Land.

- No DA as yet but they have proposed 4 x stories.
- Corrupt sale of land.
- Rezoned after sale of land.

In short, these developments are not in keeping of the area and should in your words enable growth in a way that complements the desired local character and natural setting of an area.

As we are a holiday destination we have many visitors, although the developers are only submitting unit blocks to make a quick dollar, this does not cater for the people who work in this town and families. We are slowly getting taken over by units, which are overbearing and ugly to our seaside village and empty for most of the year. In Booner/Yamba street the developer has over 10 blocks of land and will be tearing down several homes, he has already taken down three. Not all visitors want to stay in a unit, but poor planning is giving visitors no choice.

Our community is exhausted from constantly having to submit against ridiculous DA's being submitted.

I guess I and the community seek your help in relation to the potential destruction of our seaside community and the native landscape we all call home. Our local real estate agents have waitlist for people to find homes not units which seem to be what developers are planning for our town.

Please help our community.

I would also like to add on a side note, that housing developments are popping up everywhere. In this process:

- All the trees are removed.
- Blocks are too small houses are cramped next to each other basically you can see and hear your neighbors.
- Cars lining the streets as not enough parking.
- Streets are not wide enough for traffic due to parking on streets and curbs.
- No replanting of trees in streets.
- No infrastructure for traffic in surrounding communities.

Basically, what is happening the developers are creating potential poverty suburbs and the prices are not inline with this.

noreply@feedback.planningportal nsw.gov au DPE PSVC Hunter Mailbox From:

To:

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Thursday, 3 March 2022 12:23:06 PM Date:

Attachments:

Submitted on Thu, 03/03/2022 - 12:17

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name



I would like my submission to remain confidential

Info

Suburb/Town & Postcode

Hawks Nest NSW 2324

Please provide your view on the project

I am just providing comments

Submission

Please see attached for consideration regarding over development of coastal towns.

In par icular Development proposals being put to community feed back that do not meet the basic zoning requirements in regards to, but not limited

minimum se backs, maximum heights, monolithic facades and over shading of neighbouring property and community areas.

I find it inappropriate that we have strict zoning regulation for land allotments that can be over turned by large developers in the Land and Environment court that have been apposed by councils and communities.

Constantly it seems money talks winh large development and regular home owners have to abide by zoning controls with no discretion given.

I agree to the above statement



3 March 2022

Dan Simpkins
Director, Central Coast and Hunter
Department of Planning and Environment
6 Stuart Ave
NEWCASTLE NSW 2300

Dear Dan

Submission on Draft Hunter Regional Plan 2041

Thank you for the opportunity to provide comments on the draft Hunter Regional Plan 2041. Our submission on the draft plan is attached.

Your ref: GA 01/02

Enquiries: Sue Calvin

We appreciated your presentation to the Councillor Workshop on 9 February 2022 and taking the time to respond to points raised by our Councillors. The attached submission was endorsed by our Council at the Ordinary Meeting undertaken on 23 February 2022.

We look forward to working through our submission points with your Department.

Please let me know if you require any additional information.

Yours sincerely





Submission on Draft Hunter Regional Plan 2041

This submission on the draft Hunter Regional Plan 2041 (referred to as 'the Plan') is provided in two sections. The six key areas of concern for the MidCoast Council are provided below along with recommendations for changes to the Plan. This is followed by table which provides specific comments relating to each section of the Plan.

Firstly, the Department are commended for taking a new approach to regional planning. Council supports commitments made by the Department to take a greater role in facilitating land use planning outcomes of good urban design - creating resilient and liveable communities.

Council are committed to working with the Hunter-Central Coast Regional team to ensure the Plan reflects the initiatives of both the Department and the MidCoast community.

This is critical for the MidCoast, where our council and community have been on a process of strategic analysis and development since 2016, and will be consolidating our findings within the framework of the new Plan through the:

- completion and implementation of our land use planning strategies;
- implementation of our Urban Release Area Report 5-year program;
- updating of our interim Local Strategic Planning Statement; and
- preparation and implementation of our inaugural MidCoast Local Environmental Plan and Development Control Plan.

The six key areas of concern identified below represent opportunities for Council and Departmental officers to collaborate and improve the line of sight between State, regional and local planning initiatives within the MidCoast:

1. Rewrite vs review

This draft re-writes the current Hunter Regional Plan. It introduces new processes (place-based strategies, infrastructure frameworks, Hunter Urban Development Committee), which require Councils to adjust work programs to meet the needs of the Department. These new processes are not integrated into our current planning controls; they are add-ons which have the potential to duplicate or contradict current controls.

Apart from objectives relating to residential density, many of the objectives are broad and development focussed. Specific regional targets or benchmarks are not provided, making it difficult to see how they will be implemented. For example, how does the Plan ensure we are protecting the biodiversity of the region, maintaining the character of our towns/villages, delivering a net-zero status for the Hunter, or achieving economic self-determination for our Aboriginal communities?

Recommendation – review regional targets/benchmarks for all objectives with a stronger emphasis on how they will be achieved

Greater Newcastle and Hinterland districts should continue to be recognised as high growth areas, consistent with the existing Hunter Regional Plan and Greater Newcastle Metropolitan Plan.

The development requirements of Greater Newcastle, the infrastructure frameworks and Committee processes that have proved beneficial for this high growth area, should remain focused on realising the vision for this District.



However, the triggers for 'growth areas' of 2000 homes or 200ha of employment land, are not relevant to most development proposals to rezone land outside of Greater Newcastle. This aspect of the Plan does not adequately recognise that Districts outside of Greater Newcastle have unique characteristics, community requirements and expectations, that will result in a diversity of development proposals and opportunities.

Instead of arbitrary triggers and new committees, it is recommended that the Plan should instead provide a streamlined process for Councils to approach the Department for assistance to facilitate proposals that represent an opportunity to achieve objectives of both the Local Strategic Planning Statement and the Hunter Regional Plan.

This would provide an appropriate level of regional support for Council and community led urban release area programs and place-based strategies. In doing so, the Department can provide a clear commitment to support and facilitate timely outcomes from existing progresses, within the resourcing capacity of each Council.

2. Density requirements

Strategy 4.1 of the Plan states that at a minimum, development proposals will reflect an urban density of 50-75 dwellings per hectare of developable land. We have objected to this requirement on several occasions based on our current density outcomes and the impact on the character of our towns and villages.

Figure 1 (over the page) provides an analysis of sites across the MidCoast. Forster Main Beach is where our highest residential density is achieved (around 85-90 dwellings per hectare). Tea Gardens (12 dwellings per hectare) and Old Bar (15 dwellings per hectare) are relatively new developments located in proximity to local shopping centres and contain some townhouse developments. Taree West (10 dwellings/per hectare) is an example of a typical residential subdivision.

A significant change in development outcomes would need to occur in the MidCoast to achieve 50-75 dwellings per hectare. Reduced lot sizes and multi-storey apartments would be required, which would have a significant impact on the character of our towns and villages. Based on recent consultation on the MidCoast Housing Strategy, we know that such an increase in residential density would be a key community concern.

Initiatives to increase densities in the Great Lakes LEP 2014 – 30 dwelling/ha for a Medium Density Residential urban release area in Forster; and integrated development opportunities for small lot housing (200sqm in R3 and 300sqm in R2) have had limited success to date.

We acknowledge that we need to improve residential densities across the MidCoast, but the extent of the increase will need to consider community aspirations, local character and market demand in this region.

Recommendation – move from a 'one size fits all' approach to controls in the Plan.

Specify different densities and neighbourhood requirements for metropolitan/high growth and regional/low growth areas. In the regions like the MidCoast, the density should be determined through place-based plans. This would ensure that the character of each town and village is considered.





Figure 1: MidCoast analysis of urban densities

The Optimum Density recommendations of the Plan could initially target identified strategic centres – Taree, Forster and Tuncurry.

MidCoast Council's adopted Housing Strategy and Manning Health/Taree CBD Precinct Plan recognise not only opportunities for increased density of residential development, but opportunities for housing diversity and affordability within the strategic business centres of Taree and Forster-Tuncurry.

These adopted plans propose increases to building heights and reduced lot sizes. Council is also supporting the removal of floor space ratio development standards, as an unnecessary restriction to development within these centres.

These initiatives aim to encourage redevelopment (in-fill) of our urban centres and development densities consistent with the Plan, but in balance with good urban design that achieves good urban design, ageing-in-place and pedestrian-friendly environments.

Requiring this density of development in other towns, villages or adopted urban release areas of the MidCoast would not be supported by the community, as demonstrated through our extensive *Urban Zoning In* community consultation program (2020), when taller buildings and higher densities in locations such as Old Bar, Pacific Palms and Harrington were strongly opposed.

Note: The Plan identifies Gloucester as a Strategic Centre in Appendix A, but not on any mapping. Gloucester should not be identified as a Strategic Centre for the purposes of the development density initiatives in the Plan.



Gloucester is identified on p.105 as a location where a 'complete community' may be achieved and this is supported. The inclusion of Bulahdelah, and exclusion of Stroud and Nabiac is inconsistent with findings of Council's Urban Zoning In program and requires greater consultation to clarify the intent of this section of the Plan.

Stroud, Nabiac and Bulahdelah are to be consistently identified on mapping throughout the Plan, given the references to these villages throughout the text.

3. Infill vs greenfield development

The benchmarks for infill and greenfield developments for the MidCoast are as follows:

- Coastal District 70% infill and 30% greenfield
- Barrington District 30% infill and 70% greenfield.

These benchmarks are a major shift from our current development trends. While we do have infill development occurring, particularly in Forster and Taree, a large portion of our developments are greenfield. We will move towards these benchmarks in the future as greenfield opportunities decrease in the Coastal District however, this will be undertaken in consultation with the respective communities.

Recommendation - amend the benchmarks to be consistent with similar Districts as follows:

- Coastal benchmark be consistent with Central Hunter 40% infill and 60% greenfield
- Barrington benchmark be consistent with Upper Hunter 20% infill and 80% greenfield

The 70% in-fill/redevelopment and 30% greenfield development outcome assumes an infrastructure led approach to development that does not exist in the MidCoast, where the servicing and release of existing residential zoned land is predominantly developer/landowner led.

In this regard, the Regional Housing Benchmarks for the Coastal District of the MidCoast exceed those of both the Hinterland (Maitland, Cessnock, Raymond Terrace) and Central Lakes (Morisset, Lake Macquarie) without explanation or justification within the Plan.

As stated by the Department, the Coastal District of the MidCoast is closely aligned with the Coastal Districts of the North Coast, being contiguous with those of the Port Macquarie-Hastings LGA. This would suggest that the Nelson Bay area, which is a satellite suburb of Newcastle, be reclassified from a Coastal to Hinterland District, given the different development mechanisms affecting this location compared to the MidCoast Coastal Region.

Likewise, the Barrington District is more closely aligned with development opportunities and challenges of the Upper Hunter and the Regional Housing Benchmarks should be amended to reflect this.

Noting that the Plan requires local strategies 'to be in line with these Benchmarks', MidCoast Council has already adopted an urban Housing Strategy, Manning Health/Taree CBD Precinct Plan and Urban Release Area Report program that identify priority redevelopment and greenfield in 'high-growth' areas of the MidCoast.



These local strategies and programs prioritise renewal and revitalisation within the strategic centres of Taree and Forster-Tuncurry and provide for targeted greenfield development in balance with infrastructure requirements, social, economic and environmental outcomes. Based on these adopted local strategy initiatives it is requested that:

- The Coastal District only apply to areas within the MidCoast LGA and have a reduced Regional Housing Benchmark of 40% infill and 60% greenfield, consistent with the Central Hunter, reflecting existing local strategies; and
- The Barrington District have reduced Benchmarks of 20% infill and 80% greenfield, consistent with the Upper Hunter.

4. 15 minute neighbourhoods/30 minute strategic centres

Objective 5 proposes to create a 15 minute region. The aim being people should be able to walk or cycle 15 minutes to local activities (eg. neighbourhood shops, primary schools, cafes and businesses) and use public transport to 30 minute centre activities (eg. hospitals, secondary schools, entertainment facilities, offices). While these are sound concepts, they are difficult to achieve in the regions.

a) 30 minute strategic centres - the strategies in the Plan focus on development providing this level of access. The Plan should include strategies identifying what State Departments are doing to provide this level of service.

Recommendation – include State Government strategies, for example:

- Hospitals our Forster/Tuncurry community drive 45 minutes to Taree, and Tea Gardens/Hawks Nest drive over an hour to Newcastle. Strategies should be included to demonstrate what NSW Health are doing to improve access
- Public transport in most of our towns/villages the only public transport available are school buses. Given we are an area of social need with an older population, strategies should be included outlining how TfNSW will improve public transport (eg. on-demand services).
- b) 15 minute neighbourhoods in the regions this concept is difficult to achieve where public transport and pedestrian/cycle paths are limited. Strategy 3.4 in the Plan tries to address this issue, by recognising there is an urban, suburban and rural context (refer Figure 4), but then suggests that there may be seven contexts with example towns and villages nominated. These contexts need to be refined to provide clarity.

Recommendation – The Department work with Council staff to refine and apply the contexts to the MidCoast.

In summary, while the initiatives of the Plan are commended, the Plan should clarify that implementation of these concepts are to be prioritised in identified high growth areas and strategic centres.

This clarification would reflect the underlying premise that the services and facilities listed, will only be provided by public agencies and private organisations where and when they will be financially viable, which is primarily based on the demographics of a local 'catchment' area. A concept that was explored within Council's preliminary Urban Land Monitor (2019).



The initiatives and concepts of resilient and liveable communities reflect those in MidCoast Council's recently adopted interim Local Strategic Planning Statement, Housing Strategy, Manning Health/Taree CBD Precinct Plan, Biodiversity Framework and Climate Policy. They are also reflected in draft documents such as the Rural Strategy, Recreation Zones Review, Ageing Strategy and Cultural Plan.

However, the creation of 15min 'Nimble Neighbourhoods' and 30min regions must be acknowledged as a 20-year vision more clearly within the Plan. The achievement of these outcomes will rely both on land use planning initiatives and investment in public infrastructure that is outside the control of local Councils.

5. Urban release areas

It is important that the Plan identifies urban release areas across the region to not only identify where development will be considered, but more importantly where development will not. We have recently undertaken the MidCoast Urban Release Area Report 2021 which clearly identifies the urban release areas. However, these urban release areas are poorly represented in the Plan. They are not shown on Figure 4 and are inconsistently identified in the Barrington and Coastal Districts.

Recommendation – The Plan be amended to reflect the MidCoast Urban Release Area Report 2021.

It is acknowledged that the Department has reviewed and referenced recommendations from Council's interim Local Strategic Planning Statement, adopted and draft strategies.

However, preparation of the Plan was undertaken concurrently with Council's Urban Release Area Report, which provides a clear program for the implementation and coordination of future residential and employment lands. The Hunter Regional Plan therefore contradicts some key initiatives that have been accepted by the MidCoast community and adopted by Council.

Council accept the Department's offer to work collaboratively to amend and update the Plan to ensure a clear line of sight between the 5-year implementation programs for State, regional and local initiatives.

6. Housing availability and affordability

Housing availability and affordability are critical issues facing the MidCoast and the Hunter region, yet they are not specifically addressed in the Plan. With many people buying houses in the regions, property prices have increased, reducing housing affordability and availability for locals, resulting in homelessness. The MidCoast is the 24th most disadvantaged in NSW with a SEIFA index of 928, and there are pockets of extreme disadvantage with even lower SEIFA index [eg. Taree (853); Wingham (896); Tuncurry-Darawank (897) and Gloucester (912)]. There is a direct correlation between levels of disadvantage and homelessness, and currently there is no housing stock available.

In the MidCoast we are addressing housing availability by progressing our urban release areas and new MidCoast planning controls. The new initiatives and processes in this Plan could potentially slow down our new planning controls and planning proposals. For example, the new Local Environmental Plan will have to demonstrate compliance with the density requirements (50-75 dwellings per hectare) or a rezoning may not progress without a place-based strategy. The Plan needs to streamline the provision of housing on the market, rather than impose requirements that are not achievable in regional areas.



Recommendation – move from a 'one size fits all' approach to controls in the Plan. Specify different densities and neighbourhood requirements for metropolitan/high growth and regional/low growth areas. Provide interim measures to enable existing strategies and plans to progress.

As detailed previously, processes that have proved beneficial for the high growth areas of Greater Newcastle may not be appropriate for other Districts that have unique characteristics, community requirements and expectations.

It is requested that the Plan highlight opportunities for Councils to approach the Department for assistance to facilitate development proposals that represent an opportunity to achieve objectives, rather than potential penalties for not achieving arbitrary benchmarks.

In doing so, the Department can provide a clear commitment to support the creation of resilient and liveable communities, by facilitating timely outcomes within the existing progresses and resourcing capacity of each Council.



Page	Section	Comment
Part 1	– Make it happen	
8-9	A regional plan for the Hunter	Clarity of the application of the Plan. The Central Coast is mentioned but it is not clear how it is integrated. Suggest including Sustainable Development Goal 15 Life on Land: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification and halt and reverse land degradation and halt biodiversity loss. This aligns with the Plan's 'Big Ideas' (page 11) to bring a renewed focus on green infrastructure, public space and nature, and Objective 5.
12	Figure 1	The residential areas (pink) are not accurately shown. Locations like Cooplacurripa show a pink area, but it is all rural/environmental lands. The label "Conservation and natural environments" is misleading. It seems to identify "National Parks and Nature Reserves" - there are substantially more environmental areas than shown as the green-shading on this map.
14	Hunter regional vision	The final statement on the natural environment could be expanded to encompass its contribution to economic vales including primary production and tourism; and social values including health and wellbeing. This paragraph could also note that the natural environment improves the regions resilience to natural disasters and climate change.
16	Making it happen	The emphasis is to determine the infrastructure first followed by place-based planning/strategy. We need to work with the community first to determine the character of the 'place' prior to examining the infrastructure needs. What are the interim measures – how do we retrofit our existing plans? How do these frameworks/strategies integrate with our current planning controls? The Figure on page 10 should be amended to show the relationship with Local Environmental Plans and Development Control Plans.
17	Hunter urban development program committee	 Membership of the Committee appears to be development driven. Consider including: NSW Communities and Justice to address housing issues – a key outcome for this Committee Aboriginal representation to ensure integration – a key initiative of this Plan other relevant specialist State Departments (eg. Biodiversity and Conservation Division) to ensure all aspects of planning are considered. Inclusion of industry and professional stakeholders is a concern given they can influence the priorities and housing supply. Other stakeholder groups should be considered, rather than just development industry stakeholders. Need to ensure that the priorities of the lower growth regional areas are fully considered by this Committee – concern that the focus and priority setting will be for the high growth areas. Resourcing – alongside attendance, there is potential for significant involvement of Council staff to provide/review reports for this Committee.



COMMENTS ON THE HUNTER REGIONAL PLAN			
Page	Section	Comment	
18-20	Infrastructure-first and place-based framework	 This framework requires further explanation in terms of: the sequence for prioritisation – outline how priorities for high growth/metro locations will not compromise the priorities in the regions. For example, there is a housing shortage across the Hunter – will high growth areas with larger populations and higher market prices be given priority over regional areas where social and cultural issues are significant? Can planning proposals progress if they are not a priority place-based strategy for the Hunter? what is the extent of a place – is it a neighbourhood, a suburb or new town. The explanation states a threshold being more than 2,000 additional residential dwellings or sites held by more than 2 landowners – the number of landowners could significantly increase the number of sites requiring a place-based strategy. This should be increased to more than 10 landowners how are place-based strategies implemented – do they form part of the DCP? place-based strategies need to consider all aspects of planning including the character of an area and strategic biodiversity considerations (eg. preserving and enhancing biodiversity, connecting habitats). It is assumed that Taree and Forster-Tuncurry may require a place-based strategy (identified as 'urban activation and employment precincts'). Local character and biodiversity are important considerations for these communities and need to be recognised in the process resourcing place-based strategies – will DPE have sufficient resources to manage the process? Who will fund the technical studies? 	
Part 2	- Objectives		
22- 26	Objective 1: Diversify the Hunter's mining, energy and industrial capacity	Strategy 1.1 – reference should be made to remediation of contamination and rehabilitation of appropriate soil profiles and biomes and vegetation assemblages. Strategy 1.2 - there is potential for development of significant recreational facilities in this space. Mountain biking parks, horse trail riding, outdoor performance spaces, trail running, outdoor education spaces, etc. These opportunities can provide tourism and employment benefits while complimenting environmental recovery efforts. Strategy 1.3 and 1.4 – agree with the concepts of a circular economy and supporting access to supply chains. In regional areas, access to recycling industries or supply chains can be difficult, and the added transport costs can significantly increase the costs of recycling. The State should take leadership in the process of creating circular economies by assisting Councils in working together at a regional level.	
27- 28	Objective 2: Ensure economic self-determination for Aboriginal communities	The strategies are supported, but how will the Department achieve these outcomes. LALCs have limited funding to undertake their current functions. What process or support will the Department provide to work with LALCs to educate them on the planning processes, develop plans for their lands and undertake relevant studies. Funding is essential to move this objective from an idea into a reality. Include measures or benchmarks to ensure that this important objective will be achieved.	



COM	COMMENTS ON THE HUNTER REGIONAL PLAN			
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		The Plan should comment on and support the benefits of establishing new Indigenous Protected Area opportunities for Aboriginal communities on conservation important lands across the Hunter region. Page 28 – should be Stockton Bight not Stockton bite.		
29- 34	Objective 3: Create a 15 minute region	Specific comments relate to: • Strategy 3.5 - the service level of public transport in the regions will not support a 30 minute connected community and it is beyond a		
		 Strategy 3.6 – we have found that many of our neighbourhood shops and medical services are moving into the town centres because they are not viable in residential neighbourhoods. We are concerned that this strategy may require unnecessary economic justification to determine the viability of a mix of uses. Also, this strategy may enable a reduction in the need for car parking in centres, where public transport is not available and there is a reliance on cars Strategy 3.8 – requires larger developments to "facilitate a network that provides seamless connectivity to transport network with multiple access points to walking, cycling and public transport" between precincts and into centres. This could be an onerous requirement if the foundations of the network are not in place between the development and the centre, particularly in rural regions Strategy 3.9 – providing public transport is the focus for this strategy, but it provides no direction from TfNSW as to how this can be achieved 		
	Objective 4: Plan for "Nimble Neighbourhoods"	 Multi-family zoning (page 36) – can this be defined in the Plan Strategy 4.1 – as mentioned previously the urban density of 50-75 dwellings is not achievable in the MidCoast Strategy 4.2 – many of the urban release areas are located away from the town centres and public transport. Requiring these areas to have a "mix of lot sizes that shall not limit small-scale residential dwellings on 200m² lots" could have a significant impact on the overall character of an area and create lots with poor accessibility. This lot size is currently contrary to the requirements in the LEPs Strategy 4.3 – need to ensure that this strategy is not applied to manufactured home estates Strategy 4.4 – as mentioned previously the benchmarks are not achievable Strategy 4.5 – this strategy potentially removes years of planning undertaken by DPIE, councils, development industry and the community. It would be more appropriate for DPIE to undertake an analysis with councils prior to removing sites identified for potential future growth Figure 4 – Housing: there are no potential future growth areas identified for the MidCoast which is contrary to the planning undertaken over the last 20 years. To address our current housing crisis this map needs to be reviewed to identify Taree, Forster/Tuncurry, Old Bar, Hallidays Point, Tea Gardens, Gloucester, Wingham, Bulahdelah and Coopernook as having potential future growth areas the key to Figure 4 needs to be clarified in terms of 'zoned, not in production' and 'zoned, part of site in production or pre-production' 		



COM	COMMENTS ON THE HUNTER REGIONAL PLAN			
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		 Taree Airport needs to be shown to ensure consistent labelling, identify residential as "existing residential" Strategy 4.7 – need to clarify what is a 'lifestyle village'? Are they manufactured homes estates? If the 15 minute bike ride applies, they could be inappropriately located away from centres, especially if they are over 55s accommodation where residents may not ride. Are all of our town/villages in the MidCoast considered a rural setting and as a result this strategy doesn't apply? Strategy 4.9 – the majority of LEPs in the Hunter enable secondary dwellings or detached dual occupancies. How is this strategy to be implemented? This strategy is also contrary to the concept of establishing farm stays and other tourist accommodation on rural properties and should be removed. 		
44-49	Objective 5: Increase green infrastructure and quality public spaces and improve the natural environment	The strategies for Objective 5 are very broad and being a regional plan, need to examine the regional context. For example, within the Biodiversity strategies the focus is on considering biodiversity within the context of development planning. It should include strategies that proactively harness nature-based solutions for net zero emissions, conserve nature, achieve a comprehensive, adequate and representative reserve system, or secure in the wild the threatened species and threatened ecological communities of the region. Strategies that proactively address the biodiversity challenges are required outside the development planning context. In addition, there is no reference to a Regional Biodiversity Conservation Plan or equivalent, which is required to guide the effective conservation, restoration and management of biodiversity and natural areas for the Hunter region. Specific comments relate to:		
		 The public interest in why we need to accomplish it (page 45) – amend 1st sentence 2nd to add drought, flood and extreme weather events Strategy 5.1 – an integrated water management approach to for public spaces and recreation areas is supported. This strategy could go further to include water sensitive urban design into the development of public spaces and the use of recycled water and stormwater to irrigate public spaces. The use of recycled water is governed by strict protocols that should be re-examined after the drought conditions experienced in 2019-2020. The State Government should examine the licensing requirements around re-use of recycled water and develop initiatives to enable it to be utilised in public areas Strategy 5.3 – this strategy is supported. Add to the end of the sentence "or park upgrades to accommodate more park users". Strategy 5.5 – this strategy is supported. It is suggested that establishing natural shade be incorporated with Water Sensitive Urban Design objectives to achieve co-benefits for urban shade, water savings and water quality improvements Strategy 5.6 - add wetlands and waterways to the list of high environmental value areas Strategy 5.7 – amend the last sentence to include waterways along with urban bushland sites Strategy 5.9 – the regional corridors should be mapped in the plan Strategy 5.10 – this strategy could be extended to establishing water quality targets to protect community values including but not limited to waterway health. Barrington Tops to Myall Lake Link (page 48) – add the "s" to "Myall Lakes" 		



COMMENTS ON THE HUNTER REGIONAL PLAN					
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		Barrington Tops to Myall Lakes Link and Manning River Link (page 48) – both mention they will be developed through "private land incentive programs and other mechanisms such as land use planning and biodiversity offsetting". Who is responsible for this task – will this be undertaken by Hunter Local Land Services?			
50- 52	Objective 6: Reach net zero and increase resilience and sustainable infrastructure	There is concern that the strategies provided would not deliver a net-zero status for the Hunter. Harnessing nature-based solutions is important, as is providing regional models to harness landscape-scale carbon investments and securing blue carbon.			
		Strategies relating to air quality again focus on the context of development planning and need to provide a regional focus. Statement like "Planning authorities and proponents should apply a standard of improving air quality to the development of place strategies and other place planning frameworks" are not appropriate. In most cases there are no air quality issues so why would a target of "improve" be applied? The strategies potentially require air quality testing for all plans which is an onerous requirement.			
		Specific comments relate to: • Strategy 6.3 – it is difficult to achieve water security in the regions. Can the wording be changed to " work towards meeting the			
		 community's water supply needs" Strategy 6.6 – reviewing parking requirements to reduce numbers is not appropriate in the regions where public transport options are not available and given the older population, easy access to parking where they live is important 			
53- 56	Objective 7: Plan for businesses and services	These strategies have a development focus rather than a regional approach.			
57	Objective 8: Build an inter-connected and globally focussed Hunter	 Figure 5 – amend the map to show: the southern access point to The Bucketts Way moved to reflect its actual location Taree Airport should be written next to the airport symbol show the airport symbol for Port Macquarie Airport Strategy 8.1 – reword to clarify that it applies to Williamtown and Port of Newcastle 			
Part 3	– District planning an	d growth areas			
63	District planning	 The concern with the application of the districts are: the resourcing required to report of information on a district basis given our Councils recording of DAs and land monitoring is undertaken Council-wide the concepts provided in the districts can become outdated as further strategies are undertaken. Given the Plan is reviewed every 5 years changes can occur and the district information can become outdated 			



COM	COMMENTS ON THE HUNTER REGIONAL PLAN				
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		 the information can duplicate what is in the Local Strategic Planning Statements and Site Specific Plans in DCPs and become easily outdated there could be potential conflict between Councils located in a district when allocating priorities. Circle diagrams accompanying each district – these diagrams are not referred to in the text and are not representative of the objectives. There is no explanation of the terms and they do not reflect the region (eg. 15-min region). Either clarify the purpose of the diagrams or remove them. Introduction (page 63) – in the 1st paragraph change the number of districts from 6 to 7 Figure 6 – amend the map to show: the reference to Hallidays Point on the map needs to be located closer to the coast remove Dungog as a strategic centre 			
103- 105	Barrington District	 Barrington introduction (page 103) – amend as follows: "Regional city" is a term used for Taree. It was originally proposed that the Plan would have "regional city" as a type of centre but it appears to be "strategic centre" only. If this is the case can you remove this term from the Barrington district 1st sentence – change to "Communities of the Barrington district love" given we have many communities in this district 4th paragraph, 1st sentence – refer to "industries" rather than "farming" 5th paragraph, last sentence – change to "The Bucketts Way" – this is an error throughout the Plan. After "support agricultural" add "and industrial" as the good transport network will also support industry last paragraph – Dungog needs to be integrated into the text rather than an add on Figure 23 - amend to show: Brimbin on the map white areas on the map need to be identified in the map legend Biophysical strategic agricultural land – does this align with the recently exhibited State significant agricultural land? Bulahdelah within the Barrington district and include the hospital symbol if private hospitals are intended to be on the map – include a symbol for the Mayo Hospital in Taree two additional biodiversity corridors - Crowdy Bay to Comboyne link and the Barrington to Nowendoc link include road names to clearly identify the regional linkages (The Buckets Way and Thunderbolts Way) need to include the education symbol for Taree University Campus and include in the key, along with the UNE campus – move Hallidays Point closer to the coast Housing diversity and sequenced development: Move Tinonee and Bulahdelah to be un			



COM	COMMENTS ON THE HUNTER REGIONAL PLAN				
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		 medium density development will not be achievable in towns other than Taree, particularly given the proposed Medium Density zone in the Housing Strategy: This statement should be removed remove "are limited" from the last sentence as the opportunities have been available but not taken up Rural enterprises and the agricultural sector: support recognition of Wingham Beef Exports, developing health precinct in Taree based on Manning Health/Taree CBD Precinct Plan and tourism/rural initiatives 2nd sentence – amend "min ing" 3nd paragraph – remove last sentence "Limiting dwellings in rural zones" as a range of dwellings are currently permitted, and rural tourism is encouraged as outlined in the following paragraph Tourism gateways and scenic landscapes: 3nd paragraph, 1nd sentence – remove the 2nd "and encourage" and replace with "to facilitate" 4th paragraph, 2nd sentence – amend to "In the MidCoast, Wingham is developing a visitor economy around its showground with music festivals and rodeos, Gloucester around its mountain activities and Taree its food festival and mountain bike riding". Need to change the emphasis as many of these activities are community driven, not Council driven Rural towns and villages: support recognition of expansion of villages connected to sewer as listed – Coopernook, Nabiac, Bulahdelah and Stroud (consistent with our Urban Release Areas Report 2021). Need to add Tinonee and Bulahdelah (moved from "Housing diversity and sequenced development") 2nd paragraph, 2nd sentence – remove "Clarence Town" as not in this district last paragraph, last sentence – remove as it has been misinterpreted that we are establishing new villages rather			
106- 107	Taree Growth Area	 Figure 24 – amend as follows: place important identifiers on the map like Pacific Highway, Manning River Drive and The Bucketts Way remove the Taree place area boundary as it is inconsistent with the urban footprint from the Housing Strategy 			



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		 support the Investigation Areas and Redevelopment Sites but there are a number missing (Cundletown – 2, Taree South - 2) which are included in the Urban Release Areas Report 2021. Why are the 2 identified as "investigation areas" when the Forster/Tuncurry sites in Figure 29 are "Proposed Urban Release Areas"? There needs to be a consistent approach the extent of Northern Gateway Transport Hub can be reduced to include the industrial zoned land show on the map all of the points mentioned in the text include State Forest in the legend Taree Growth Area: 2nd paragraph - support Manning Health/Taree CBD Precinct points. Should it mention that initial planning for a new hospital is underway? 3rd paragraph - amend wording "such as Fotheringham Park." 4th paragraph, 1st sentence – remove "is poor, and" given it is a negative statement 4th paragraph, 2nd sentence – and "diversity" after "density" 2. Northern Gateway Transport Hub: 2nd dot point – change "rail station" to "railway line" 4. Urban Release Areas: new dot point – investigate airport related facilities in the Cundletown urban release areas new dot point – leverage the proximity of the M1 Pacific Highway to Taree South to expand the precinct in the urban release areas 6. Employment Precinct – remove as covered in 4. Urban Release Areas 6. Employment Precinct – remove as covered in 4. Urban Release Areas 6. Employment Precinct – remove as covered in 4. Urban Release Areas 7. Regional recreation centre: amend the 1st dot point - Plan for and deliver facility upgrades to ensure that high quality regional sporting fields and recreational facilities are available to support community use and sports tourism events. 			
	Brimbin Growth Area (new section under Regionally Significant Growth Areas)	Include text for Brimbin Growth Area – the detailed planning is currently underway, so we don't have specific precincts or plans identified at this stage, but it is important to identify this site given the extent of development proposed. Brimbin Growth Area Brimbin is located 8km north-east of Taree. The site extends from the Lansdowne River to the east through to the Dawson River in the west, straddles Lansdowne Road and covers an area of around 3,700ha. Manning Lakes is being planned as a new town which when fully developed (in around 30 years), is expected to accommodate a population of around 22,000 people.			



COMN	COMMENTS ON THE HUNTER REGIONAL PLAN				
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114	Constal District	Brimbin includes 874 hectares of residential and 112 hectares of employment lands. There will be a mixed-use centre and three neighbourhood centres, four schools comprising three primary and one high school and a range of rural and environmental living lands, with over 1,000 hectares of land for conservation and reserve purposes. Planning for this new town will continue to ensure that 15-minute walking neighbourhoods are achieved with a variety of housing choice and employment opportunities. Access to Taree will be important to provide services and facilities as Brimbin develops. • Figure 28 – amend to show:			
114-117	Coastal District	 Figure 28 – amend to snow: the continuation of the environmental corridors from the Barrington district the private hospital at Forster? should the 'Biophysical strategic agricultural land' mapping be shown (as per Barrington district) move Hallidays Point closer to the coast place Bulahdelah in the Barrington district Tea Gardens should be expanded to include Hawks Nest Coastal district introduction (page 115): 1st sentence – remove Crowdy Head and Diamond Beach 2nd paragraph, 2nd sentence – add the full stop after 'The Lakes Way." 4th paragraph, last sentence – add the "is" into "the Myall Lakes which is protected" 4th paragraph, last sentence – there is an emphasis on hazards in this district, but not others – need to consistently apply across all districts Future growth in existing urban areas: 1st paragraph - Support paragraph that coastal towns and villages along Myall, Smith and Wallis Lakes will have urban development confined to existing urban zones (i.e. density changes only – no release areas). Need to ensure that Forster/Tuncurry is excluded from this statement) 2nd paragraph – this statement needs to be reworded as Large Lot Residential development may be supported and encouraged where there is a net community or environmental benefit. We are to undertake a Large Lot Residential Strategy which will inform the suitable locations for this type of development across the MidCoast Coastal walks between communities: 1st paragraph, 2nd sentence – reword to "Walking is a popular activity for locals and attracts tourists" 1st paragraph,			



COMI	COMMENTS ON THE HUNTER REGIONAL PLAN			
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		New section Throughout the Coastal district, planning for effective inter-urban breaks with well-managed and conserved green spaces/natural areas is very important. This should be mentioned in the Plan; with regard to securing and managing such areas Figure 29 – amend to show: the 5 growth areas as shown in the Urban Release Areas Report 2021 for Forster. There is an exception for the Cape Hawke Drive site which should be shown as per the Housing Strategy (refer to the right) need to show the numbers that correlate to the text should the private hospital be shown? the open space layer incorrectly shows private land (eg. Big Island) the canals in Forster Keys appear as road rather than canals Coomba Park – land shown as rural residential is included the Environmental Living zone and land shown as residential is in the Large Lot Residential zone. Land in the village zone is not identified Forster-Tuncurry Growth Area:		
		 4th paragraph - support the comments around bridge congestion – should it be acknowledged that TfNSW are currently looking at options for upgrade/duplication? 1. Forster town centre and Main Beach – replace the current dot points with the following: Promote connections between Forster Harbour and Main Beach. Explore opportunities to extended hours for dining and retail businesses within the main street. Continue to activate the lakeside of the main street (Memorial Drive). Encourage businesses to be outward facing and improve public domain to create a more vibrant space for people to interact with local businesses and the lakefront. Seek opportunities to connect more of the walk and cycle paths along the lakefront. Ensure design excellence for taller buildings to reduce impacts on coastal town character. Ensure connections to the new Civic Precinct that activates the southern portion of the town centre. 2. Tuncurry town centre and lake foreshore - replace the current dot points with the following: Tuncurry's main street provides a mixture of commercial, retail, residential and visitor accommodation. It is also the main access road through town and over the bridge to Forster. Tuncurry's main street has yet to reach its full potential. There are great opportunities for new commercial and retail ventures through infill or redevelopment. The flat terrain makes it ideal to further develop linkages between the main business area, surrounding residential and visitor accommodation down to the waterfront/lakefront. It also offers uninterrupted lake and ocean views for the taller buildings. 		



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		 Develop walking and cycle paths to link future North Tuncurry development site with existing residential areas 4. Urban Release Areas: 2nd bullet point – question the reference to "infrastructure such as health". Photograph (page 119) – remove the Business name (Hamilton Oysters) as it has changed its business name 			
	North Tuncurry Growth Area	Include text for North Tuncurry Growth Area – the detailed planning is currently underway, so we don't have specific precincts or plans identified at this stage, but it is important to identify this site given the extent of development proposed.			
	(new section under Regionally Significant Growth Areas)	North Tuncurry Growth Area			
		Landcom is seeking to rezone approximately 615ha of land for urban development and conservation purposes in North Tuncurry, to the east of The Lakes Way, near the golf course. A range of land uses are envisaged including residential, employment, tourism, community, open space and conservation areas within the North Tuncurry growth area.			
		The North Tuncurry development aims to provide:			
		 approximately 2,123 dwellings in 22 residential precincts, released over 30 years new employment and service areas within a new business precinct, industrial precinct and small commercial centre open space corridors connecting to local parks and water features reconfiguration of the existing Tuncurry Golf Course a range of infrastructure and services to facilitate development the permanent protection of approximately 328ha of sensitive environmental land. 			
120	Appendix A	Table 2 – need to remove Gloucester and Dungog as strategic centres			

From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Thursday, 3 March 2022 3:15:35 PM

Attachments:

Submitted on Thu, 03/03/2022 - 15:14

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info

Suburb/Town & Postcode

Taree, 2430

Please provide your view on the project

I am just providing comments

Submission file

Submission

MidCoast Council submission

I agree to the above statement

Yes



DRAFT HUNTER REGIONAL PLAN SUBMISSION

The Barrington District's community love the rural, quiet and relaxed nature of the area and its proximity to work, cities, family and services.

The following points raised in this submission go to the heart of addressing the Hunter Regional Plan's own testimony, as stated above. However the 'one shoe fits all' approach as outlined in the current plan and the apparent lack of understanding for how our Towns and Villages have evolved and function, has encouraged us to respond.

We, the MidCoast Business Chamber representing all eight Chambers in the Mid Coast LGA, put forward this submission which is the result of consultation across our Membership base. We have informally surveyed our Members who are from Manufacturing, Retail, Medical, Construction and Housing, Real Estate and Service Industries to name a few.

Our groups acknowledge and recognise the enormous amount of work that has gone into the draft document and commend the responsible parties for their vision for the Hunter.

It is the overwhelming opinion of our groups that the plan is exceptional in its goals for the highly populated Newcastle Metropolitan area and larger Hunter Regional Towns, but without considered changes is not a good fit for our LGA (except for several small zones that are close to the town centres). Our research indicates that the plan would be subject to massive push back from the Community, if densities were to be increased to the 50 to 75 Dwellings per HA ratio suggested and the heights that go with these densities were implemented. It is recommended that the Hunter Regional Plan adopt a percentile radius method, specific to regional towns, indicating the radius from CBD's, that this rule applies. Furthermore, specific mapping could be established for each regional centre, indicating exactly which areas are associated with this rule, rather than a blanket radius.

The plan in its current form takes a single approach for the Hunter Region and does not cover the all important reasons why people settle in our LGA. Over the past 30 years, our Councils have done everything in their power to protect the look, amenity and feel of our Towns and Villages... and the general consensus is they have done a good job. The proposed plan has the ability to undo this good work. It is our opinion that there needs to be further work done to differentiate between Metropolitan and Regional locations and to accommodate our communities concerns. The potential impact of Planning Processes suggested in the Draft Plan will restrict our ability to grow and should be given further consideration. These restrictive measures should be removed all together.

Please find following our responses to where the Draft Plan does not fit with our LGA:

Part 1. INFRASTRUCTURE

In most instances, our towns and villages already have the main Infrastructure in place and the lack of infrastructure is not a major impediment to growth. Alignment is not an issue. We have a Developer pays system for connections and reticulation through either contributions or physical works. Sewer and water expansion is already well catered for in Council's Strategic plan.

Objective 3. 15 MINUTE REGIONS

Due to our size, a lot of the facilities and services are outside the 15 minute walking / riding radius of land available for Development. The plan needs to recognise the different scenario's that exist between Urban and Regional locations. It is our opinion that the second scale (30 minute drive scenario) is workable in our LGA.

Objective 4. NIMBLE NEIGHBOURHOODS

First paragraph –

Over the last few decades, and even the last few years, housing needs and preferences have been changing rapidly. Trends towards smaller Households are being seen as the population gets older and the number of people in each household gets smaller.

This in our Region, this is not an accurate statement and is not evidence based. In fact land size requests and home size M2 have dramatically increased with the main offenders being both <u>active and non active retirees</u>. On available land, a 4 Bedroom 2 bathroom, 2 garage home of 230m2 to 500m2 (House M2 Only not Land) is being requested and constructed in all of our towns, villages and rural sites. People move here to have space and prefer separation over density. Attempts to increase densities in the Great Lakes area to 30 dwelling/ha for medium density and integrated development & small lot housing 200m2 in R3 and 300m2 in R2 have had very limited success due to no appetite from end users and Developers alike.

As far as housing affordability is concerned, it is closely related to the supply of available land and competition for land. The extreme land shortages, land banking and location preference across the whole LGA is why current land if available, is attracting very high prices. These high prices will remain as long as supply is kept tight... exacerbating housing affordability.

e.g. If a Developer purchases land for \$30,000 englobo and development costs are \$110,000 and a reasonable margin is 40%, the land should sell for \$196,000 not the \$300 - \$320,000 in Taree and \$400-\$500,000 in Coastal areas. NB. Construction costs per M2 increase as the size of the dwelling decreases.

Strategy 4.1.

Increased densities such as 50 to 75 Dwellings per HA are the exact opposite to what people want in our rural and regional areas. Increased densities around and in very close proximity to the commercial hubs are the only high density development likely to be accepted by our Communities. The historical take up for all but multi-storey coastal has been less than desirable.

Strategy 4.4.

This strategy is not consistent with what is actually required or happens in our regional towns and villages. Evidence is that whilst there is some infill in specific areas, greenfield expansion is by far the greater of the two. The ratio's nominated in the Draft are way out of line with what is required for our locations. Again, the one fits all approach does not work. Ratios of 30% infill to 70% greenfield for Coastal and 20% infill to 80% greenfield for Barrington would be more consistent with our areas. 70% infill to 30% greenfield for Coastal as nominated in the Draft Report is a ratio we have difficulty in understanding how it could possibly work in our LGA.

The Draft plan overlooks the all important <u>Covered Agricultural Enterprise Expansion</u>. A further strategy could be included to encourage land that can be made available for the rapidly emerging covered agricultural enterprises. Hydroponic vegetable growing, Greenhouse horticulture, Flower growing, and Boutique herb growing to name a few. These enterprises require 5Ha to 10Ha, generally 2 dwellings and employ 1 to 10 staff depending on the size of the operation. These enterprises could then take advantage of the Williamstown Airport extension and access to air freight to Asian markets.

BARRINGTON.

Regionally significant Growth Areas.

The Barrington label does not match any current identification for our region. 'Barrington Coast' is used for Marketing purposes but our request is to change the name in the plan and instead refer to our area as MidCoast, in line with our existing MidCoast LGA identity. After Council amalgamations, some years ago, this is of significant importance to our communities.

4. Urban Release Areas.

If North Taree Urban release area is referring to Brimbin, it should not be considered as part of Taree as it is a well removed new town. It should not be considered as available until such a time as a Masterplan has been completed and there is substantial commitment to actually developing the site.

The Brimbin project, as we have been told, is the single main impediment to being able to re- zone land in Taree, as it is considered by the Dept of Planning that we have sufficient land already zoned for future growth. This project has sat for a decade or so and could easily take another. Council note that they are working with the Developers although they do not have plans yet - they are coming. It is our respectful opinion that plans do not equal development. We respectfully request that Brimbin not be calculated in the Taree figures and it be treated as a separate town which is its intention. This single shift has the potential to relieve the land shortage crisis we are currently running into.

The MidCoast LGA is part of the Hunter Regional Plan due to our geographic location, however the needs, issues and opportunities of our 94,000 + strong communities are not being addressed in this draft. We ask that changes are swiftly made to better reflect housing needs so that our region continues to grow and thrive.

We would warmly welcome the opportunity to speak directly with the responsible team members to share further facts, evidence and stories that support our submission.



MidCoast Business Chamber (MCBC) is a group which was formed across the MidCoast LGA's eight business chambers as a united way to drive Economic Development and be the go-to for council in relation to Business and Community matters. It is a Company Limited by Guarantee with Directors from each of its member chambers – Taree, Forster/Tuncurry, Gloucester, Wingham, Hawks nest/Tea Gardens, Bulahdelah, Harrington/Crowdy Head and Old Bar. It's Directors and representatives from all chambers, actively and voluntarily give their time and energy to supporting local business, community groups and MidCoast Council in driving Economic Development across the LGA. MCBC is supported by Business NSW and meets both formally and informally with a variety of organisations across the MidCoast on a regular basis.

From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Thursday, 3 March 2022 6:38:52 PM

Attachments:

Submitted on Thu, 03/03/2022 - 18:32

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Mid Coast Business Chamber

Last name



I would like my submission to remain confidential

Info



Suburb/Town & Postcode

Taree 2430

Please provide your view on the project

I object to it

Submission file

Submission

We Object to the Draft Plan in it's present form. Careful thought and processes are required so as to cater for Rural regional places as distinct from Urban Newcastle. One shoe does not fit all and this approach will be damaging to our areas.

I agree to the above statement

Yes

Draft Hunter Regional Plan Better Business Taree Submission

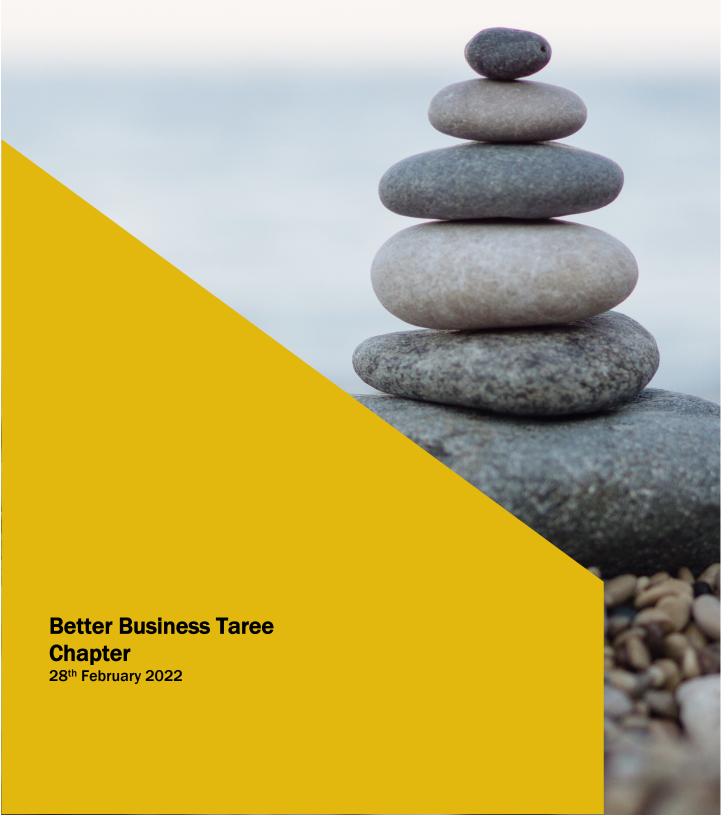


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"The Barrington district's community love the rural, quiet and relaxed nature of the area and it's proximity to work, cities, family and services"



Better Business Taree Chapter

This submission has been prepared by the Better Buisiness Taree Chapter in response to the Draft Hunter Regional Plan.

Better Business Taree is a structured group of local business people, who collectively support and strive for business growth, opportunity, regional economic development and business & community engagement. Better Business Taree's collective goal is to contribute, share, grow and thrive, jointly with other business's and our local economies and communities.

Better Business Taree's members consist of building designers, real estate agents, conveyancers, solicitors, manufacturers, builders, bankers and finance brokers, travel agents, insurance brokers, developers, accountants, IT services, pest management services, marketing services and financial advisors, many of whom are also local influential figures, within community organisations throughout the Mid Coast.

This submission has been preapred as a result of consulation and discussions within our membership group, along with discussions and input from community members & businesses, associated with our members.

The preparation of this submission is a collective view from a large array of business's active within the entire Mid Coast LGA, and forms a close and united connection to the Mid Coast Business Chamber and Team Taree.

1.0 A Regional Plan for the Hunter

1.1 What are the big ideas in the new draft hunter regional plan?

1.1.1 15-Minute Mixed Use Neighbourhoods

Observations

Better Business Taree (BBT), highlight that while a 15-minute strategy may work within metropolitan areas such as Newcastle, many needs are not feasibly accessible within a 15-minute walk, ride or drive of developable land, within the Mid Coast LGA, specifically on the outskirts of regional centres such as Taree. It is noted that further within the draft plan, reliance on driving is strongly discouraged, proving contradictory to this.

The current infrastructure within and around regional towns throughout the Mid Coast, does not align with this goal and in some instances will be difficult to achieve with future infrastructure developments.

Recommendations

It is recommended that the Hunter Regional Plan adopt specific mapping for each regional town, indicating infill areas for optimum density limits of 50-75 dwellings per ha. These areas may be calculated by either a percentage of radius from the CBD or by further community and council consultation.

It is recommended that the 15-minute neighbourhood strategy be excluded from developments outside of these mapped areas, noting that these developments use the 30-minute objective of the Draft Hunter Regional Plan (DHRP) as a guide, or the 15-minute neighbourhood strategy be amended to include driving, and be used as a guide.

1.1.2 Emphasis on Infill Approaches to Growth over Greenfield

Observations

BBT highlights that optimum density limits proposed within the DHRP, are bias towards state and federal infrastructure spending targets and do not align with the appetite of people living and working within regional Mid Coats areas.

Support for infill within proximity to regional CBD's is widespread, however the emphasis on infill within the Mid Coast Council LGA, specifically Taree, will receive strong push back from the community. BBT note that the ratio of Infill &

Greenfield within the Barrington area, must heavily favour Greenfield, to ensure sustainable growth that aligns with community appetite.

Taree is suffering from the unavailability of new land releases, more specifically larger lot releases (upwards of 600m2), and it is adversely affecting the towns growth. Taree is the largest employer within the Mid Coast LGA, and has the lowest 'Vacancy Rate: Population 'ratio of the Mid Coast LGA, confirming demand is far outweighing supply.

Sales figure within the past 24 months indicate that larger lot residential blocks within Taree, have rapidly sold upon release to the market. Prior to recent land releases, Taree has not witnessed a new "desirable" land release since the Manning Waters Estate, released in the mid 2000's.

Growth figures referenced within the Urban Land Monitor (ULM) prepared by Mid Coast Council, present a misleading figure, indicating a growth rate of 0.33% for Taree. BBT & the business community within Taree, unanimously agree that this growth rate figure is a direct result of a town that is unable to expand, due to the lack of rezoning of developable land, for residential subdivisions, and is proving to restrict the economic development and population growth of Taree.

BBT are concerned that the objective of the DHRP to focus on an infill approach, will adversely contribute to the ongoing shortage of available residential land in and around Taree. BBT identify that the optimum density limits and the 15-minute objective, may considerably restrict efforts and desire from developers and council, to identify and implement the re-zoning of appropriate land, within and around Taree and other regional towns in the Mid Coast Council LGA.

Recommendations

BBT recommend that the Infill & Greenfield ratio be no more than 20% Infill for the Barrington Coast Area. It is also recommended that the above mapping method, stated in the recommendation for section 1.1 of this submission, be adopted as the metric to indicate optimum infill areas.

1.1.3 Reinforcing the Importance of Equity

Observations

BBT note that within the DHRP, the current focus on Infill and optimum density limits, may have an adverse effect when offering people greater choices in how and where they live, how they travel and where and how they work.

The optimum density limits outlined within the DHRP, indicate that developable land must target an optimum lot size between 133m2 to 200m2 per lot. BBT are **strongly** against these optimum density limits proposed, specifically for regional

towns, and are concerned that this may contradict the idea of the "importance of equity" when referring to choices, specifically, where and how people live. BBT acknowledge that these density limits are relevant within a metropolitan area such as Newcastle, however, are not desired within the Mid Coast Councils LGA.

BBT are also concerned that these optimum density limits may restrict choice and adversely affect the mental health and livelihoods of people living and working within regional areas, by promoting dense living standards, where people's connection to nature, private open space, and the outdoors, is essential to their way of life.

Recommendations

BBT recommend that optimum density limits of no less than 450m2 per lot, be proposed for developments outside of optimum density mapped areas (See section 1.1 recommendation) of regional CBD's.

2.0 Objectives

2.1 Objective 3: Create a 15-minute region made up of mixed, multi-modal, inclusive and vibrant local communities

2.1.1 Strategy 3.1

Observations

BBT identify that the suburban context of the 15-minute neighbourhood, indicates that development proposals will have to demonstrate how various employment, commercial, community, recreation and education services will be located within 15 minutes cycling distance from residential and mixed-use zones. This raises concerns for regional towns, where developable land and previous town planning, restrict alignment to this objective.

Recommendations

BBT recommend that when referring to regional towns that would be classed as "Suburban Contexts", the 15-minute objective apply to 15 minutes via motor vehicle to various employment, commercial, community, recreation and education services.

It is recommended that for regional towns, a focus on Electric Vehicle infrastructure be adopted, to assist in reducing the use of motor vehicles that

negatively impact the environment, in lieu of proposing **undesired** dense living arrangements, within 15-minute walk or cycle to various employment, commercial, community, recreation and education services.

2.1.2 Strategy 3.4

Observations

While the 15-minute neighbourhood target is a great concept, the emphasis on achieving the objective should be target based and not a requirement for development applications or re-zoning of land.

BBT are concerned that there may be instances where the 15-minute neighbourhood will be a challenging concept to achieve and may restrict growth and prosperous opportunities in regional towns, specifically in the Mid Coast I GA.

Recommendations

It is recommended that specific to regional towns, the 15-minute concept be referred as a "**guide**", to ensure that it does not become a requirement of development proposals.

2.1.3 Strategy 3.5

Observations

The 30-minute connected communities' context is not possible within the Mid Coast Council LGA, due to existing infrastructure and size of the LGA.

BBT are concerned that there may be instances where the 30-minute connected communities' objective, will be a challenging concept to achieve and may restrict growth and prosperous opportunities in regional towns, specifically in the Mid Coast LGA.

Recommendations

It is recommended that specific to regional towns, the 30-minute connected communities objective be referred as a "**guide**", to ensure that it does not become a requirement of development proposals.

2.1.4 Strategy 3.6

Observations

BBT are concerned that optimum density limits and a mixed-use approach, is not sensible and/or desired within the Mid Coast LGA. Placing high density limits on residential subdivisions, to support community-serving commercial centres, reinforce the observations outlined in section 1.1.3 of this submission.

The use of motor vehicles within the Mid Coast LGA is essential to access community-serving commercial centres, and with a combination of dense subdivisions, BBT are concerned that parking and access to these services may become a major issue.

It has been observed that town planning in Newcastle, has failed to solve the problem of parking and storing motor vehicles, at premises in dense Newcastle council areas. BBT are concerned that with a mixed-use approach, combined with dense occupancy limits, this same issue will transfer to the Mid Coast LGA regional towns.

Recommendations

A development proposal that indicates access to community-serving commercial centres, via 15-minute drive in a motor vehicle, should **not** be refused on this basis instead should be encouraged.

If a mixed-use approach is to be adopted, density limits will be required to be decreased to a more sustainable and realistic figure, consistent with regional appetite, such as 450m2 **minimum** lot sizes. BBT acknowledge that this contradicts the density limits to support community-serving centres and recommends that in regional areas, community-serving centres within 15-minute drive, form the basis for this strategy.

2.1.5 Strategy 3.8

Observations

BBT acknowledge that within metropolitan areas, connection via walking, cycling and public transport between precincts and centres is achievable. The Mid Coast LGA will require considerable investment in infrastructure to achieve this. It should also be noted that not all developable land currently has access to government infrastructure to enable the adoption of this strategy by developers.

Recommendations

It is recommended that within a regional context, this strategy be implemented as a "guide" only, to ensure that development proposals where government

infrastructure between developments and regional precincts and centres, does not enable "seamless connectivity to transport network with multiple access points to walking, cycling and public transport", does not restrict development proposals.

2.1.6 Strategy 3.9

Observations

BBT acknowledge that public transport and access to public transport is critical in densely populated areas such as Newcastle, to maximise the efficient movement of citizens around the city. Throughout the Mid Coast LGA, many towns and villages have adequate infrastructure in place, and the absence or lack of any major upgrades to this infrastructure, should not restrict growth and expansion opportunities.

Infrastructure development for public transport should be focused around town centres such as Taree & Forster. Adequate planned infrastructure upgrades will need to be proposed by state and federal governments to align with this strategy.

BBT are concerned that the lack of what could be considered 'unnecessary' infrastructure upgrades, could disadvantage development opportunities and mis-align them with the Hunter Regional Plan.

Recommendations

BBT recommend that the existing metrics where developer pays for system connections and reticulation by either contributions or physical works, is maintained where existing infrastructure is available or planned. Where there is minimal connection to existing infrastructure available, specifically for public transportation, this should not restrict development proposals.

It is recommended that Transport NSW propose a regional public transport infrastructure plan, specific to the Mid Coast LGA, to ensure development and growth opportunities are not only maintained but created.

2.2 Objective 4: Plan for "Nimble Neighbourhoods" diverse housing and sequenced development

2.2.1 Strategy 4.1

Observations

BBT highlight that the optimum density limits of 50-75 dwellings per hectare of developable land, equate to 133m2 & 200m2 per lot. This does not align with regional development and will receive widespread criticism and community push back. While BBT understand the logic behind the DHRP to achieve minimum density limits, to support a local mix of land uses, and to justify the development of reasonable public transport, this approach does not satisfy community appetite.

It should be noted that the DHRP optimum density limits are considerably out of touch with regional lifestyles and should **NOT** be adopted by regional towns. Upon consultation with BBT members, community members, community figures and a vast array of Mid Coast LGA contributors, we received a very passionate disgust that was 100% unanimously expressed, against the optimum density limits proposed by the DHRP.

If these optimum density limits were adopted in the Hunter Regional Plan, BBT are concerned that it will result in significant community backlash, anger and negative criticism of the plan. Furthermore, BBT are concerned that such a negative community push and the adoption of the proposed density limits, would result in adverse views regarding the Mid Coast area, resulting in a widespread of negative economic repercussions.

Within Strategy 4.1, furthermore to the abovementioned, it is stated that "justification would be required to support development proposals less than this range that can still achieve the outcomes listed". BBT are concerned that the DHRP has been prepared with a metropolitan mindset, disregarding how regional towns function. Requirement for justification to meet the optimum density limits by developers, will reduce the feasibility of investments within the Mid Coast LGA, restricting growth opportunities by enforcing an unnecessary "red tape" approach.

Recommendations

BBT recommend that optimum density limits of no less than 450m2 per lot, be proposed for developments outside of the percentile radius area (See section 1.1 recommendation) of regional CBD's.

BBT recommend that transport NSW consider amending the minimum density range necessary for there to be reasonable public transport, for regional towns

such as Taree, to align better with regional lifestyles and realistic regional density limits.

It is recommended that the sentence "justification would be required to support development proposals less than this range that can still achieve the outcomes listed above" in strategy 4.1, be removed from the Hunter Regional Plan.

2.2.2 Strategy 4.2

Observations

It should be noted that the Mid Coast Council and former Greater Taree City Council, along with all other amalgamated councils in the Mid Coast LGA, have ensured over the past 30+ years, that the look, feel, function and overall amenity of our towns remains protected. Implementing a mixed use approach, favourable to lot sizes of 200m2, is inconsistent with regional lifestyles and will contradict the reason people choose the Mid Coast LGA to live and work.

Recommendations

It is recommended that the percentile radius area method (See section 1.1 recommendations) be adopted and restrict the dense mixed-use approach to these areas.

2.2.2 Strategy 4.4

Observations

BBT note that the DHRP specifically indicates that the methodology behind a dense infill strategy is due to "the greater the percent of growth by infill, the greater the savings in public infrastructure spending". While this may be well received by communities in metropolitan areas such as Newcastle, BBT are concerned that community back lash regarding optimal density limits will be heightened once community knowledge of the approach and reasoning is more widespread. The appetite for dense living within the regional Mid Coast LGA is low and therefore will need consideration regarding specific locations and density limits within those locations.

Recommendations

BBT recommend density limits for the Barrington district be changed to 20% infill and 80% Greenfield.

It is recommended that optimal density locations be identified on a map using the percentile radius method (See section 1.1 recommendation), indicating the optimum infill areas of each regional centre such as Taree.

2.3 Objective 5: Increase green infrastructure and quality public spaces and improve the natural environment

2.3.1 Strategy 5.3

Observations

BBT note that a requirement of any extensions to growth areas, to connect to established open space networks, may restrict developments opportunities within the regional towns of the Mid Coast LGA, due to the access of developable land near existing open space networks.

Recommendations

While BBT support the idea of new public open spaces, it should not be a requirement of a development proposal to connect to an existing public open space, unless the infrastructure pre-exists near the site. If an open space network is not planned or constructed near a proposed development site, it is recommended that a development proposal not be refused due to the inability to connect to an existing open space network.

2.4 Objective 6: Reach net zero and increase resilience and sustainable infrastructure

2.4.1 Strategy 6

Observations

It is a concern that Introducing maximum parking limits in regional neighbourhoods, with an aim to reduce parking, will prove detrimental to the function of our neighbourhoods and cause unwanted congestion. Reliance on vehicles in regional towns such as Taree is inevitable, and the public transport infrastructure does not exist to considerably reduce this reliance.

BBT acknowledge that this strategy has been proposed with a metropolitan mindset and does not align with the function of regional towns. It is evident that a metropolitan approach has resulted in this proposed strategy due to the reference to ride sharing services that are not available regionally.

Recommendations

Increasing optimum density limits to a minimum of 450m2, outside CBD's, within regional towns, will enable neighbourhoods to incorporate off street parking spaces within the designs of homes.

It is recommended that in regional areas, the Hunter Regional Plan encourage the increase in central parking lots within the CBD's, to encourage pedestrian movement around the CBD, once community members arrive by motor vehicle.

2.5 Objective 7: Plan for businesses and services at the heart of healthy, prosperous and innovative communities

BBT support Objective 7, specifically strategy 7.1 and strategy 7.3. Taree specifically, is in need of significant renovation and revitalisation of the main streets atmosphere and aesthetics. To enhance attractiveness and promote a night-time economy, key security agreements with police, additional decorative street lighting and the council's engagement to promote businesses and eateries to engage in the nigh-time economy is essential.

3.0 District Planning & Growth Areas

3.1 Barrington

"The Barrington district's community love the rural, quiet and relaxed nature of the area and it's proximity to work, cities, family and services"

3.1.1 Taree Growth Area

BBT note that the NSW Government is working on the redevelopment of the Manning Base Hospital to help support improved healthcare outcomes. The group is concerned that directing considerable funds to the redevelopment of the existing Manning Base Hospital (MBH) does not plan for long term growth in the area. MBH is restricted by space and any redevelopment or expansion to better serve the community, will eventually reach a maximum capacity on the available lot.

While the MBH is vital to the Mid Coast LGA, the existing hospital does not serve the entire Mid Coast LGA effectively and any efforts to redevelop the hospital on the existing lot, will eventually reach capacity due to an ageing population and growing LGA.

A push for a greenfield site at Failford is supported by BBT, for the construction of a new hospital, to effectively serve the entire Mid Coast LGA and place an emergency department within 30 minutes of both Forster & Taree. By proposing a greenfield site for a new hospital, most regional significant growth areas can comply with the 30-minute connected communities' objective.

Urban Release Areas

BBT acknowledge that the DHRP indicates a focus on future urban growth to the Taree Estate and North Taree Urban Release Areas.

While BBT support the developments, it should be noted the Brimbin (North Taree) should NOT be considered an urban release area associated with Taree.

The distance of Brimbin to Taree is significant and the proposed development is marketed by the developers and the Mid Coast Council as "A New Town", and therefore should be treated as its own community.

It is the opinion of BBT and the broader community, that the allocation of land zoning to Brimbin over the past 2 decades, has significantly contributed to restriction of growth and re-zoning of land within Taree. This has been confirmed on several occasion by MCC and the department of planning over the past decade, and it is recommended that a new perspective that separates Brimbin from Taree, has the potential to solve land shortage issues within Taree.

While Brimbin is a part of the Mid Coast LGA, BBT again highlight that Brimbin should **NOT** be considered available land in Taree and therefore should not influence assessments for land re-zoning in and around Taree.

BBT recommend that further assessment by MCC for areas in the corridor between Kolodong and Wingham, be re-considered for re-zoning as Urban Release Areas, due to community appetite to live in the area. Highlighting the corridor between Koldong and Wingham as Urban Release Areas, aligns closer to the proposed objectives and strategies within the DHRP, due to is proximity to public transport, infrastructure and community-services.

End Submission

This submission has been prepared by **Better Business Taree Chapter**

President

Jake Dawson - UpBound

Contact

admin@caldongroup.com

Mailing

9 Grey Gum Road, Taree

SUPPORTING BUSINESSES

Collins W Collins | UpBound | Regional Finance Solutions | First State Conveyancing | Local Pest Experts | Empire Advisors | Coastline Credit Union | Oxley Insurance Brokers
Caldon Group | Your Heritage Financial Planning | PFH Engineering | Lang & Simmons Manning Valley | HTH Joinery (HowsThatHouse) | Gembeck Pty Ltd

From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Thursday, 3 March 2022 8:09:47 PM

Attachments:

Submitted on Thu, 03/03/2022 - 20:06

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info

Suburb/Town & Postcode

Taree 2430

Please provide your view on the project

I object to it

Submission file

Submission

Better Business Taree Disagree wi h the draft hunter regional and outline recommenda ions as stated in the attached submission.

I agree to the above statement

Yes





4 March 2022

Department of Planning, Industry and Environment Central Coast Regional Plan Team PO Box 1226, NEWCASTLE NSW 2300

By email: hunter@planning.nsw.gov.au

Uploaded: Planning Portal

Submission to Draft Hunter Regional Plan 2041

Dear Madam/Sir,

, being Lot 221 DP 101245, Lot 201 DP 715396 and Lot 1 DP 530737 (Site).

The Site is 16.28ha in size and zoned IN2 Light Industrial. It is currently leased by UGL for the manufacture and maintenance of locomotive and passenger cars.

This lease will be concluded in the coming years and the owner has been actively considering the future of this important property.

As such, the owner has carried out extensive investigations into the constraints and opportunities for the Site (including an Urban Design Report) and is firmly of the opinion that the highest and best future use for the Site is for a mixed use development comprising residential and business development zoning.

This concept has been previously shared with senior members of Newcastle Council, DPIE and Hunter Development Corporation and has received verbal, in principle support.

The Draft Hunter Regional Plan 2041 (DHRP) generally recognises this potential and includes the Site within the regionally significant Broadmeadow growth area; and our Client supports this outcome.

However, in light of the work completed and the importance of the Site, we request that the DHRP is amended to include specific recognition of the Site's potential to facilitate a co-operative and constructive planning process to ensure the optimum outcome for both the owner and Newcastle Community.

We expand on these points below.

A. Location & Site Description

The Site is a large, 16.28ha, industrial site in the suburb of Broadmeadow. It is roughly triangular in shape with Griffiths Road on the southern boundary. It is one of the largest single private land holdings in the locality.

The Site is approximately 5km from the Newcastle CBD and located between Broadmeadow train station to the south and Waratah train station to the north. It is within walking distance (400m) of three bus routes accessed from Broadmeadow Road, Turton Road and Christo Road.

There are local shopping villages and services nearby at Waratah, New Lambton and Hamilton.

Opposite the Site is the Hunter Stadium, Newcastle Harness Racing Club, Newcastle Showground and to the east are light industrial properties fronting Broadmeadow Road. Bordering the site to the north-west along Griffiths Road is the Council Depot and further on are light industrial properties on either side of Griffiths Road.

There are playing fields and parks at Smith Park, District Park, Lambton Park and Waratah Oval, all within a 15 minute walk from the Site.

The residential streets of Georgetown abut the 'green' verge of the stormwater easements that run along the northwest boundary of the Site.

The Site is listed in the Newcastle Local Environment Plan 2012 (NLEP) as a heritage item of local significance as an; 'industrial site' for the English & Australian Copper Co. and for Goninans and a 'relic' for Former Lambton Colliery Railway. This includes the main administration building and associated significant trees at the north-eastern end of the Site.

Lot 201 DP 715396 and Lot 1 DP 530737 are rail connections to the main railway line to the north of the Site.

We provide location plans and current zoning extract in the following Figures.



Figure 1 – Subject Site

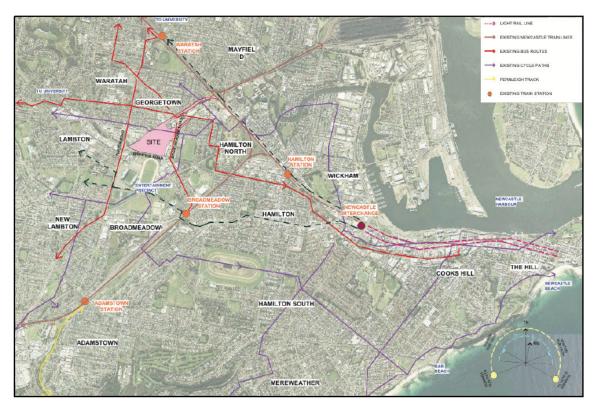


Figure 2 – Locality Plan



Figure 3 - Current Zoning

B. Site Opportunities and Constraints

In considering the future of the Site, the owner has undertaken a significant amount of site investigation and urban design analysis to underpin a Draft Urban Design Report and preferred development outcome.

This work identified the following Site opportunities:

- Large consolidated main site (14.34 ha) under single ownership suitable for development
- Flat site with good north orientation
- Green buffer zone along the north western boundary
- Amenity provided by Heritage listed administration building and associated significant trees
- Adjacent to light industrial, bulky goods, retail and low rise residential (single-two storey detached dwellings)
- Adjacent to existing cycle paths
- High public exposure to Griffiths Road
- Substation located adjacent to the Site is to be decommissioned
- Easy access to existing bus services along Broadmeadow Road to the east and Turton Road to the west

- Easy access to Broadmeadow train station
- Easy access to existing park (Smith Park) sports stadium (Hunter Stadium) schools (Hamilton North Public School, Lambton High School) Shopping Centres (Waratah Shopping Centre) and retail outlets
- Easy access to the Entertainment precinct; Hunter Stadium and Entertainment Centre
- The large single use Light Industry Lands (IN2) is now inappropriate within such proximity of the City Centre

This work also identified Site constraints that inform and influence the appropriate development outcome for the Site. These are identified as:

- Traffic noise from arterial road (Griffiths Road) to the south
- Restricted vehicle and pedestrian access to the site due to rail lines, stormwater channel and arterial roads
- Smaller linear supplementary sites (1.51ha and 4326m²) unsuitable for development but useful for infrastructure upgrade
- Main site occupied with large industrial sheds, currently used for manufacture of carriage works; underutilised shed and surplus land; and administrative building
- Relatively small frontage (483m and 42m to Griffiths Road and Broadmeadow Road respectively) compared to the area (14.34ha) of the main site
- Stormwater channel along diagonal western boundary
- Identified and managed pockets of soil contamination
- Existing disused rail tracks
- No direct access off Griffiths Road

The identified Opportunities and Constraints are demonstrated in the following Figure.

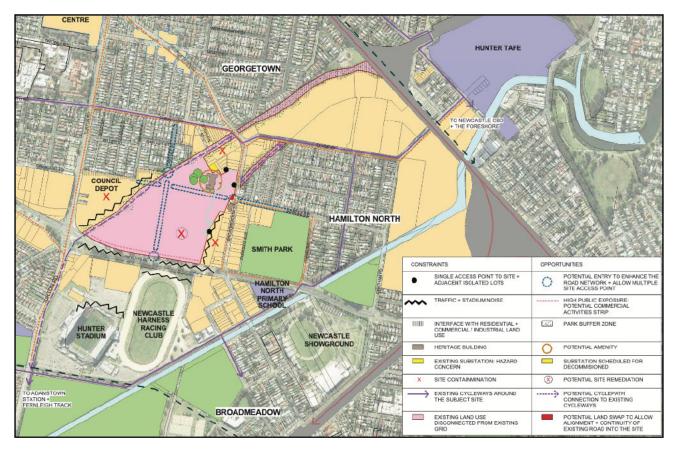


Figure 4 - Opportunities and Constraints

C. Site Vision

The owner's vision for the Site is to create a sustainable urban environment that utilises its unique location to achieve renewal, to improve connections to the local area and to encourage appropriate employment opportunities.

In preparing the concept plan, the Architect relied on the following design principles:

- Create a mixed-use precinct to strengthen neighbourhood by providing housing and employment
- Create a permeable movement network of new local streets for convenient access and address to dwellings and facilities
- Extend existing street network of Georgetown to the north to form new street network
- Delineate a network of public open spaces that can have a range of uses
- Create a street and open space network that encourages walking and cycling

- Clearly define developable areas from public open spaces
- Locate building form that responds to orientation and site landscape features such as the stormwater channel
- Create a socially sustainable development by providing a diversity of medium density housing types (2 storey townhouses), 4-6 storey residential flat buildings and two taller forms at 12 storeys
- Create 'hybrid' residential block types that provide diversity and inclusion
- Provide dwellings with a high standard of residential amenity
- Create appropriate employment uses such as building and hardware supplies, 'homemaker' stores, service station, take away food and drink premises and bulky goods store
- Retain and adaptively reuse existing administration building for potential uses such as community facilities, educational establishments, child care, health services, local shops, cafe, tourist and visitor accommodation
- Retain all significant trees
- Provide 25% developable land as common open space
- Create movement connections to adjoining streets and areas for pedestrians, cyclists and vehicles
- Maintain vehicle and pedestrian access to adjoining properties
- Provide non-residential uses that generate employment along Griffiths
 Road
- Create landscaping and built form that acts as a noise buffer along Griffiths
 Road
- Establish a site framework for compliance with SEPP 65 and Apartment Design Guide, in particular; built form separation, solar access, cross ventilation, communal open space, deep soil and setbacks
- Establish a network of new streets, open space and built form that could extend to the adjoining sites to the west

An extract from the draft concept plan is included in the following Figure.



Figure 5 - Concept Plan

The work also identified a suite of required amendments to NLEP to facilitate this outcome. These are included in the following Figures.



Figure 6 - Indicative future Zoning



Figure 7 - Indicative future HOB



Figure 8 - Indicative future FSR

D. DHRP – Comments and Opportunities

Within the DHRP, the Site is shown as within the Broadmeadow regionally significant growth area.

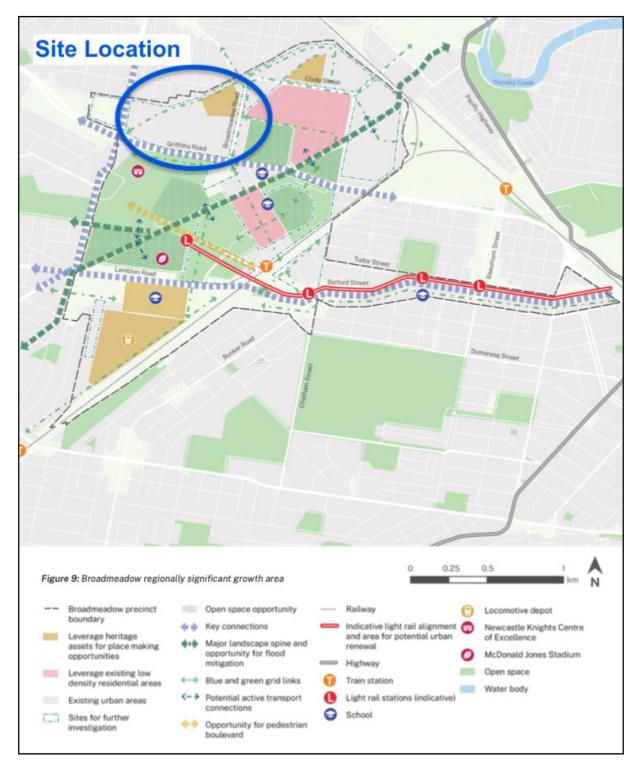


Figure 9 - Extract from DHRP

The DHRP from Page 71 provides the description of the area and the vision for its future.

The Concept Plan prepared by the owner is consistent with and supports the objectives of the DHRP and we have extracted portions of the text and provide the following observations and comments in relation to these extracts and the Site and existing Concept Plan.

1. Blue and green heart of Newcastle

- Create vibrant community spaces through quality public spaces and plazas.
- Ensure well connected green and natural space networks along Styx Creek.
- Ensure greater ecological restoration and urban greening.
- Cool places by retaining water and expansive tree-canopy in the landscape.

The Concept Plan provides a considered and generous amount of open space, with approximately 25% of developable land proposed as common open space which is designed as a network of green spaces that can have a range of uses.

A key element of this will be the park curtilage to be established around the existing heritage significant administration building and the substantial trees in this precinct, which will be retained and protected.

The greenway on the north-west boundary will be extended allowing for connections beyond the Site and the retention of heritage significant rail lines will be incorporated into an interpretative trail with potentially external gymnasium equipment, which will provide further amenity.

A linear park toward the southern side of the Site acts as a green zone within the Site allowing for a range of activities and acts as buffer between the commercial uses, Griffiths Road and residential uses.

2. Active and public transport

- Improve pedestrian and active transport connections across Styx Creek, the rail line, and Griffiths, Lambton and Turton roads.
- Establish a clear hierarchy of open spaces for legibility and wayfinding.
- Improve public transport, including potential future light rail connections, and active transport connections.
- Increase housing choice within walking distance of transport networks.
- Create accessible spaces for all members of the community.

The Concept Plan creates movement connections to adjoining streets and enhances existing links for pedestrians, cyclists and vehicles.

A potential future light rail route and stop along Griffiths Road will compliment and in turn be supported by the proposed employment generating uses on this boundary and the new residents proposed within the Site.

The proposal creates a socially sustainable housing choice by providing a diversity of medium density housing types, 4-6 storey residential flat buildings and two taller forms at 12 storeys which is all within walking distance of train stations and bus routes accessed from Broadmeadow Road, Turton Road and Christo Road.

3. Heritage assets

- Re-use heritage sites and significant buildings.
- Integrate significant landscape sites into the fabric of Broadmeadow.
- Engage and celebrate Aboriginal and European heritage.

The Concept Plan will retain and adaptively reuse existing administration building for potential uses such as a community facility, educational establishment, child care centre, health services, local shops, cafe, tourist and visitor accommodation.

The proposed interpretative trail will enhance the heritage elements of the railway tracks.

Nationally significant entertainment precinct

- Leverage upgrades and improvements to the Hunter Park to create a world-class sport and entertainment complex.
- Make Broadmeadow as a destination of choice for entertainment, recreation and discovery.

The proposal has the potential to provide tourist and visitor accommodation to support the entertainment precinct and establishes a commercial edge along the Griffiths Road frontage which will provide opportunities for businesses and services to support the entertainment precinct.

Urban renewal and climate change adaptation

- Focus opportunities to achieve sustainable built form and public space outcomes.
- Encourage affordable housing choices that respects local character.
- Manage flooding/water cycle from Styx Creek and its tributaries as part of the green infrastructure of the city.

 Provide opportunities for land uses to transition and adapt in a changing landscape.

The Concept Plan creates a mixed-use precinct to strengthen neighbourhood by providing housing choice and employment, which is well serviced by transport options.

The proposed layout creates a permeable movement network of new local streets that is integrated into the existing fabric of the locality.

The housing provided will be diverse and is designed to transition to the employment uses on the southern boundary.

The dwellings will provide a high standard of residential amenity and be sustainably designed.

E. Requested Amendments

The Concept Plan prepared by the owner is consistent with and supports the objectives of the DHRP, and the DHRP is a timely and important opportunity to identity and facilitate the future development of the Site.

As such, we request that the DHRP is amended to include specific recognition of the Site's significant potential in order to facilitate a cooperative and constructive planning process to ensure the optimum outcome for both the Owner and Newcastle Community.

F. Conclusion

The owner has carried out extensive investigations into the constraints and opportunities for the Site (including an Urban Design Report) and is firmly of the opinion that the highest and best future use for the Site is for a mixed use development comprising residential and business development zoning.

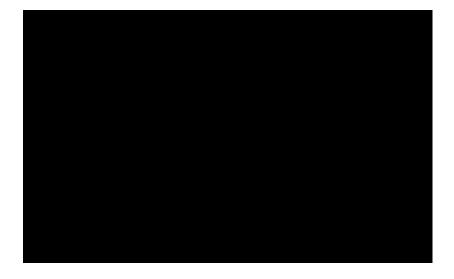
This concept has been previously shared with senior members of Newcastle Council, DPIE and Hunter Development Corporation and has received verbal in principle support.

The Draft Hunter Regional Plan 2041 (DHRP) recognises this development potential and includes the Site within the regionally significant growth area, which we support.

However, we request that the DHRP is amended to include specific recognition of the Site's significant potential to facilitate a cooperative and constructive planning process to ensure the optimum outcome for both the Owner and Newcastle Community.

We would be pleased to meet and discuss any of these issues at your convenience and provide a copy of the full Urban Design Concept Report for your consideration and information.

Yours Sincerely,



To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Friday, 4 March 2022 9:42:51 AM

Attachments:

Submitted on Fri, 04/03/2022 - 09:39

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info



Suburb/Town & Postcode

Please provide your view on the project

I object to it

Submission

Please see attached our submission. We support the Plan in Principle but request changes; so it it does not fit neatly into one of the three options provided above.

I agree to the above statement



Attention of: NSW Department of Planning and Environment Via online submission form

Submission: Draft Hunter Regional Plan 2041

The Community Housing Industry Association NSW (CHIA NSW) welcomes the opportunity to provide a submission on the draft Hunter Regional Plan 2041 (the draft Plan).

CHIA NSW is the industry peak body representing 94 registered, not-for-profit community housing providers (CHPs) in NSW. Our members currently own or manage more than 51,000 homes across NSW for individuals and families who cannot afford to rent or purchase a home on the private market. Since 2012, CHPs have delivered more than 1,265 new homes in regional communities, representing an investment of \$392 million. Critically, these are new homes that the private sector cannot – or will not – deliver in response to housing need.

Investment in social and affordable housing in the Hunter Region is critical to tackling housing affordability issues in the area. At the 2016 Census approximately 61% of very low to moderate income households renting in the Region were experiencing rental stress. Rental affordability in regional areas has worsened as a result of the COVID-19 pandemic. In the year to December 2021, median rents in the Region have increased at a significantly faster pace than wages, rising more than 10% in seven out of the ten local government areas (LGA)ⁱ. In particular, Cessnock, Newcastle and Maitland LGAs have been identified as having one of the highest levels of housing need in NSWⁱⁱ.

As the draft Plan rightly acknowledges, housing plays a critical role in the creation and strengthening of successful neighbourhoods and communities. In addition to supporting diverse and inclusive communities, the delivery of adequate affordable rental housing is essential to supporting economic opportunities in the Region, retaining essential workers, and attracting new ones. This has been recognised by the Regional Housing Taskforce, which identified social and affordable housing as essential social and economic infrastructureⁱⁱⁱ.

CHIA NSW welcomes the draft Plan's recognition of the importance of providing housing that caters for identified needs, including more affordable housing. However, to achieve this the draft Plan needs to focus on more than just facilitating smaller and more diverse housing forms. Specific observations and recommendations are outlined below.

Social and affordable housing supply targets

Strategic planning has historically focused on the overall quantum of housing needed. However, this has not been effective at increasing the proportion of supply that is genuinely diverse and affordable. To ensure that sufficient supply is provided across the housing continuum, the draft Plan needs to set clear targets for net growth in social and affordable housing. In this regard, CHIA NSW notes that the draft Central Coast Regional Plan 2041 includes such targets.

Establishing affordable housing targets in the draft Plan will provide a clear indication of the scale of supply and the types of housing products required, and highlight where specific models are needed, such as delivery tailored to Aboriginal communities or other priority households. It will also establish a

common set of targets for councils and Government agencies, including the Land and Housing Corporation (LAHC) and Aboriginal Housing Office, to work to, supporting more effective collaboration.

Collaborative working will leverage better outcomes

There is a need for collaborative efforts across all levels of government, and the not-for-profit and private sectors, to support the timely provision of good quality and well located social and affordable housing. A lack of joined-up working leads to delays, inefficiencies and missed opportunities.

CHIA NSW therefore supports the collaborative approach to implementation outlined in the draft Plan. As part of this, CHIA NSW recommends the establishment of an affordability roundtable with councils, state agencies, CHPs and the housing development industry to identify measures to improve housing affordability and diversity in the Region. Such a roundtable is proposed to be established in the New England North West Region.

A key focus of the roundtable should be the preparation of a joint delivery plan for the Region that identifies how all levels of government will work collaboratively with the not-for-profit and private sectors to deliver the social, affordable, and Aboriginal housing that is needed.

CHPs are well placed to work with all levels of government to deliver affordable housing outcomes in the region. CHPs can maximise the impact of government investment by leveraging their development capacity and significant financial benefits, including lower cost finance available through the National Housing Finance and Investment Corporation (NHFIC). In this way CHPs can work to unlock development opportunities and increase housing supply.

For example, Argyle Housing is collaborating with Griffith City Council to deliver purpose-built low to middle income housing projects. Argyle Housing is leveraging finance secured from NHFIC with land gifted by the Council to deliver new homes, to be delivered by the end of 2022.^{iv}

Improving access to land

Many CHPs have reported difficulties accessing suitable development sites in regional areas. This was recognised by the Regional Housing Taskforce, which found a number of factors were preventing zoned land being activated, including a lack of enabling infrastructure and unresolved environmental issues.

CHIA NSW therefore welcomes the draft Plan's focus on better coordinating infrastructure and land use planning through an "infrastructure-first and place-based" approach and expansion of the urban development program. CHIA NSW also supports the draft Plan's aspiration for a 15-minute region made up of inclusive and vibrant communities with ready access to transport, services and facilities.

However, more can be done to support access to land for affordable housing. Land owned by both state and local government presents a real opportunity to maximise the delivery of social and affordable housing in regional communities. As recommended by the Regional Housing Taskforce, facilitating the use of government-owned land for social and affordable housing will support development feasibilities and opportunities for new supply.

CHIA NSW recommends that the draft Plan introduces a benchmark for the delivery of social and affordable housing on government-owned land. State agencies disposing of or developing surplus land should be required to include a range of initiatives to address housing diversity and the need for affordable rental housing. A similar requirement exists in the Greater Sydney Region Plan.

The draft Plan should also incentivise regional councils to identify a pipeline of council-owned sites that could be used to support affordable housing partnerships with CHPs. Several councils, such as Central Coast Council, are already starting to undertake this work.

Renewing existing public housing

The renewal of public housing estates provides an opportunity to increase the supply and quality of social, affordable and Aboriginal housing. CHIA NSW recommends the draft Plan includes a commitment to assess the potential to renew social housing stock in the Region. Such a commitment has been introduced as part of the review of other regional plans, including in the Central West Orana Region.

Recent examples have demonstrated the benefits to local communities that can arise from renewing public housing sites in partnership with CHPs. For example, Pacific Link Housing worked with LAHC to replace three ageing homes in Glendale with a mixed community of 21 modern fit-for-purpose homes. The partnership enabled LAHC to double the number of social homes on the site. Such projects also improve public understanding of the need for new social and affordable housing and the resultant community benefits.

Affordable housing contribution schemes

Affordable housing contributions schemes are an efficient and effective mechanism. They provide certainty to the community and developers, enabling local councils to plan for and fund affordable housing in partnership with not-for-profit organisations such as CHPs.

Regional councils can support the feasibility of affordable housing contributions by adopting a scheme policy and framework committing to investigating their feasibility whenever a location is rezoned. Introducing this requirement now will help build understanding of the model and ensure affordable housing is included where possible as regions grow and develop. This policy needs to outline the expected contribution rate to provide advanced notice to the market of a council's intentions.

The draft Plan needs to actively support the implementation of affordable housing contributions schemes in the Region by establishing an expectation that schemes will be investigated whenever sites are upzoned. Similar provisions exist in the Greater Sydney Regional Plan.

Improving local council planning frameworks

The Regional Housing Taskforce has recommended the review of planning controls and incentives to ensure settings are effective in encouraging social an affordable housing supply in regional contexts. This needs to extend to local planning controls, which can impose additional barriers on the delivery of social and affordable housing through a lack of flexibility and/or by impacting development feasibility.

The draft Plan needs to include a requirement for development proposals to demonstrate how they support and incentivise affordable rental housing. This should include the use of planning mechanisms such as mandatory zoning requirements or planning incentives. Development controls must also be tested as they are being established, to ensure they do not undermine the feasibility of new affordable housing.

Supporting outcomes for Aboriginal communities

CHIA NSW welcomes the draft Plan's focus on supporting the economic self-determination of Aboriginal communities. This includes a commitment to building the delivery capacity of Local Aboriginal Land Councils (LALCs) and facilitating economic and development outcomes through the Aboriginal Land Planning Framework.

The draft Plan can further support economic and social outcomes for Aboriginal families and communities by requiring strategic planning undertaken by regional councils and Government agencies to consider and align with the full suite of Closing the Gap outcomes and targets. This includes ensuring planning controls support the delivery of housing that is appropriate to the social and cultural requirements, living patterns, and preferences of Aboriginal households.

CHIA NSW appreciates the opportunity to provide feedback on the draft Plan. We would be happy to discuss any of the recommendations further.



References

ⁱ Department of Communities and Justice, Rent and Sales Report, December 2021 quarter

ii Regional Australia Institute, New South Wales Regional Housing Needs Report 2021, Shelter NSW, Sydney

iii Regional Housing Taskforce, Recommendations Report, October 2021

iv https://argylehousing.com.au/new-low-to-middle-income-housing-for-griffith/

^v For more information visit: <u>https://www.yourvoiceourcoast.com/CAHL</u>

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Friday, 4 March 2022 10:39:49 AM

Attachments:

Submitted on Fri, 04/03/2022 - 10:38

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info

Suburb/Town & Postcode

2016

Submission file

Submission

Please refer to attached submission from the Community Housing Industry Association NSW.

I agree to the above statement





4 March 2022

Hunter Region
Department of Planning, Industry and Environment
PO Box 1226
NEWCASTLE NSW 2300



Dear Sir/Madam

RE: Draft Hunter Regional Plan 2041

We refer to the exhibition of the Draft Hunter Regional Plan 2041 that covers 10 LGAs and sets the strategic land use framework for the region over the coming 20 years. The Draft Plan results from the 5-year review of the original Hunter Regional Plan prepared in 2016.

WaterNSW is a State-owned Corporation established under the *Water NSW Act 2014*. It owns and manages 42 dams and associated water storages across NSW. We are the key agency for regulating surface and groundwater in NSW under the *Water Management Act 2000*, including administering water access licences, water supply work and flood work approvals. We also manage unregulated and groundwater customer systems including the operation of hydrometric services, including stream gauging and water quality and groundwater monitoring equipment.

WaterNSW has an interest in the Plan with respect to the protection and management of its assets and lands, water quantity and quality, and with regard to its responsibilities under relevant legislation. WaterNSW's assets in the region include Glenbawn, Glennies Creek and Lostock Dams, which are managed to provide water for irrigation, stock, industry and household needs. Glenbawn Dam also provides the raw drinking water supply for the townships of Scone and Murrurundi, while Glennies Creek Dam supplies the township of Scone, with Lostock Dam supplying the township of Dungog.

WaterNSW is supportive of Regional Plan and the breadth of water-related issues addressed, such as water security, water quality, stormwater management, waterways, riparian corridors, water flows and aquatic ecosystems. It also recognises the importance of protecting surface and groundwater in drinking water catchments. We believe, however, that there may be an opportunity to better consolidate water-related issues under the section 'waterways and drinking water catchments'. This section could be repositioned to refer to 'Sustainably managing and conserving water resources' and embrace matters such as water sensitive urban design. It could also draw together other water-related initiatives of the plan.

Detailed comments are provided in Attachment 1. Should you have any questions regarding the matters raised here please contact



ATTACHMENT 1 – DETAILED COMMENTS

The Draft Regional Plan

Co-ordinated planning for Hunter and Central Coast

Figure 1 (p. 13), which provides a map of the main land uses of the region, would benefit by identifying the location of Glenbawn, Glennies Creek and Lostock Dams and more clearly distinguishing the LGA boundaries of the ten Council areas comprising the region.

Objective 5: Increase green infrastructure etc

The public space and urban greening

We note and support Strategy 5.1 (p. 46), which advocates for an integrated water management approach using recycled water and stormwater to irrigate public spaces.

Biodiversity values

Strategy 5.6 discusses how strategic and use planning should identify and take account of the location and extent of land with high environmental values. Threatened species, biodiversity corridors and koala habitat are specifically mentioned. Passing mention is made of water quality. Strategy 5.6 could be expanded to make mention of riparian corridors as these assist in both biodiversity conservation and water quality protection.

Waterways and drinking water catchments

We note and support the risk-based approach to addressing land use change in water catchments as advocated under Strategy 5.10 (p. 49). The Plan notes that this will take into account mitigation and infrastructure measures to protect water quality. This section would benefit by more specifically mentioning catchment management and source water protection approaches to protect water quality, particularly from diffuse sources of water pollution.

We support the intention of applying neutral or beneficial water quality objectives to surface and groundwater drinking water catchment areas, including to minimise the impact of development on watercourses, wetlands, lakes etc. 'Water storages' could be specifically added to this list of waterbodies and water resources that benefit by the neutral or beneficial water quality objectives.

There is also an opportunity to broaden and consolidate water-related issues by expanding the section on 'Waterways and drinking water catchments' to address the 'Sustainable management and conservation of water resources' more broadly. Information under Objective 11 of the Draft New England North West (including Strategies 11.1-11.3) and Objective 4 of the Central West and Orana Regional Plan (including Strategy 4.1) could be used for guidance. The Draft Plan would also benefit by increasing recognition of water sensitive urban design, which could be included in this section.

Including references to Lostock, Glennies Creek and Glenbawn Dams would give strategies such as Strategy 5.10 a more direct scope. This would also give the photos of Glenbawn Dam (p. 49) and Lostock Dam (p. 77) greater context as currently these dams are not referenced beyond the captions to these pictures. Glennies Creek Dam is not currently mentioned at all in the document.

The Draft Plan would also benefit by referencing the proposed Lostock Dam to Glennies Creek Dam Pipeline project. While currently in the initial planning stages, the project aims to enhance water security and reliability, and improve drought resilience through improved water connectivity in the Upper Hunter catchment. The proposed pipeline will, in times of high water yield, enable water from Lostock Dam to be transferred to Glennies Creek Dam where it can be stored for use in dry periods. This will improve reliability for water users supplied by the two dams and will concurrently reduce the demand on nearby Glenbawn Dam. Again, these matters would best fit in an expanded section on water resources. More information on the Lostock Dam to Glennies Creek Dam Pipeline project can be found at https://water.dpie.nsw.gov.au/water-infrastructure-nsw/regional-projects/lostock-glennies-creek-pipeline.

Objective 6: Reach net zero and increase resilience and sustainable infrastructure

Community resilience to natural hazards

Strategies 6.1 and 6.2 provide initiatives to address natural hazards such as bushfire, flooding, and coastal erosion. Strategy 6.2 commits development proposals to take into account disaster risk management planning and adoption frameworks for these hazards and to avoid areas of high risk. We support this Strategy but believe the commitment should extend to planning proposals (rezonings) as well as development proposals.

Strategy 6.3 commits 'Hunter Water and other water providers' to meet the community's water supply needs under all climatic conditions, including minimum supply requirements during a long and severe drought. The Strategy notes that this will require a transition to rainfall-independent water sources as part of the *Lower Hunter Water Security Plan* and drought management plans in other areas. As indicated above, the Lostock Dam to Glennies Creek Dam Pipeline project will improve drought resilience in the region for the areas they service.

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

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Attachments:

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Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info

Suburb/Town & Postcode

Parramatta 2150

Please provide your view on the project

I am just providing comments

Submission file

waternsw-submission---hunter-regional-plan.pdf

Submission

Please see attached WaterNSW submission..

I agree to the above statement

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Friday, 4 March 2022 12:41:39 PM

Submitted on Fri, 04/03/2022 - 12:41

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info



Suburb/Town & Postcode

Please provide your view on the project

I object to it

We purchased land in order to invest in the future for my Children now the government wants to reZone our land to make it an environmental zone from a Rural zone, we now have worthless land if it's rezoned. Will the citizens be reimbursed for the loss of value? What about the people hat are after affordable housing? They now don't have the possibility because it is being rezoned with no possibility of future development for housing.

I agree to the above statement



Hunter Environment Lobby Inc.



Submission on Draft Hunter Regional Plan 2041

This submission has been prepared by Hunter Environment Lobby (HEL), a regional community organisation. Since its establishment in 1990, the group has made a significant contribution to the protection of the environment in the Hunter Region through its Hunter Regional Environmental Action Plan, public forums, submissions, and role in supporting the establishment of the Upper Hunter Air Quality Monitoring Network.

The group has been represented on NSW Government committees including Hunter River Management Committee, Mount Owen Mine Flora and Fauna Management Committee, Lower Hunter Regional Strategy Working Group, and Upper Hunter Air Quality Monitoring Network Advisory Committee.

HEL is pleased to comment on the above Draft Planning document by the NSW Planning Department and can see there are some pleasing aspects in the Plan, however we can also see many deficits and we will suggest a more sustainable way forward for a much better community outcome.

The Plan

HEL feels that this Draft Plan has come from a non-transparent process that has seemed to have discarded the current Hunter Regional Plan 2036 with no reference or review of that plan which was prepared five years ago. We would have liked to see a plan with over a twenty year timeframe which is intended to guide land use and investment well into the future, to have more rigour.

We expected an independent review in the time since this last plan was launched – indeed we see no evidence of any substantial review or evaluation of any of the last four regional land use strategies prepared for our Hunter Region since 1982.

We cannot say there have been no reviews however the public has not been able to examine these in any useful way, thus they are not effective or transparent.

The Plan is vague

As we know, strategic land use planning is about what happens where, and why. HEL feels these regional plans should identify long term directions as well as priorities, and provide the context for making decisions that will affect the community forever. We can see that economic costs impacts on quality of life as well the management implications of not planning effectively, will be substantial and ongoing.

Some of the 'Big Ideas' of the Draft Plan have merit, however there are no actions or targets presented which could be a measurement of outcomes – we see wishy washy statements regarding 'community resilience to hazards' and 'improve air quality' which do not provide answers to communities trying to make sure our communities remain sustainable whilst growing and expanding

Land Use and Integration with all agencies plans

We are disappointed to note that that there does not seem to be any integration in this Draft with any transport or water sharing plans – this seems to be short sighted. An example is seeing how integrating with Hunter Transport plan could look at answers to the huge growth in populations in many of the dormitory or subsidiary suburban areas throughout the Hunter presently.

Public transport, cycle ways and walking paths are encouraged however we need to see a firmer plan for these paths to set the agenda well into the future as far as land use planning is concerned. Many newer suburbs seem to have won the jackpot in infrastructure compared to the older ones which do not have adequate cycle ways or walking paths.

An interchange at Glendale and protection of future corridors needs to be discussed – there are competing plans for the Hunter Rail Freight corridor which needs examination by our community. We see that a climate change proof rail corridor will ease the issues we have presently.

There are many small asks that can be achieved with encouragement for better future outcomes for our main suburban areas, another example is the encouragement to the Dept of Transport to incorporate another rail station at the new Maitland Hospital.

There is, it seems, no other Hospital in the state apart from Westmead where a hospital is closer than three hundred metres to a railway line – this station would be well used by patients, visitors and staff alike. We need to see a plan of this magnitude address issues that matter to our communities

Biodiversity protection

HEL sees a lack of focus on Natural Biodiversity protection in this Draft Plan - it is disappointing to see so much energy expended on many areas which leaves a gap in biodiversity and important conservation lands, of which there are many.

Renewable Energy

There is a clear lack of adequate guidelines for many issues, however it is crucial to ensure that renewable energy projects have very good and community accepted areas on which to site renewable energy projects.

This is crucial into the future as there are many important areas including high conservation lands, plus rural focussed lands which need preservation.

Limiting Climate Change effects

HEL has been concerned for well over thirty years to seeing governments do more to mitigate effects of climate change on our community here in the Hunter. At this time as

we are seeing deaths in Queensland and NSW from floods and storms are threatening again all the way down our NSW coast we must address this issue in all the forward planning areas we can.

Prevention of land clearing, water catchments preservation and biodiversity preservation are all crucial for us to see better outcomes on effects on climate change – we need to see real and effective governance by NSW State Government to ensure the priorities that the community crave are implemented.

Yours in trust,



To:

noreply@feedback.planningportal nsw.gov au
DPE PSVC Hunter Mailbox
Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Friday, 4 March 2022 12:44:39 PM

Attachments: 220304-submission-hunter-regional-plan-2041.pdf

Submitted on Fri, 04/03/2022 - 12:36

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info



Suburb/Town & Postcode

East Mai land 2323

Please provide your view on the project

I object to it

Submission file

220304-submission-hunter-regional-plan-2041.pdf

Submission

Please acknowledge receipt of submission by Hunter Environment Lobby Inc

I agree to the above statement



4 March 2022

Hunter regional plan team
Department of Planning, Industry and Environment
Via: online submission portal

Dear Hunter regional planning team,

Re: Draft Hunter Plan 2041

Port Waratah Coal Services appreciates the opportunity to comment on the review of the Hunter Regional Plan 2041.

About Port Waratah Coal Services

Port Waratah Coal Services has been receiving, stockpiling, blending and loading coal for export at the Port of Newcastle since 1976. We own and manage the Kooragang and Carrington coal terminals, which operate 24/7 and have a combined capacity of 145 million tonnes per annum. Our terminal services are critically important to the region's coal industry, delivering an efficient, high quality and reliable service. Port Waratah plays a vital role in the Hunter Valley Coal Chain, enabling our customers to reach a global market.

Port Waratah is an unlisted public company owned by the industry, which works in partnership with more than 25 producers and other service providers in the Hunter Valley Coal Chain. Port Waratah has a strong track record of leadership in partnering with and investing in our local communities. We are committed to continuously improve our environmental performance, contribute to the local economy by buying and employing locally and support sustainability and resilience of the local community though our Community Investment and Partnership Programme.

Comments on the Draft Plan

The commentary and strategies under Objective 1 - Diversify the Hunter's mining, energy and industrial capacity, and Part 3 - District planning and growth areas (Central Hunter) send clear signals the Government acknowledges the continued important contribution to the regional economy the coal industry makes and secondly, will support a flexible approach to planning matters as we navigate the global energy transition.

Given the obvious importance of the coal industry to the Hunter Region, the plan should at a minimum include references to the NSW Government's Strategic Statement on Coal Exploration and Mining in NSW to reinforce this strategic position towards transition in the Draft Plan.

Both the Draft New England North-West Regional Plan 2041 and the Draft Central West Orana Regional Plan 2041 include references to the Strategic Statement on Coal. Given the scale and



importance of the coal industry in the Hunter, it appears to be an oversight to exclude any reference to the NSW Government's policy framework supporting the industry.

The commentary and strategies under Objective 8- Build an inter-connected and globally focused Hunter signals the Government understands and supports the global connectivity that competitively positions the industries of the Hunter. However, while the plan acknowledges this competitive position it does not articulate in sufficient detail support or protection of supply chain infrastructure, freight corridors and strategic land associated with the vital trade through global gateways.

The Greater Newcastle Metropolitan Plan 2018 articulates the desired roles of the Global gateway of Newcastle Port recognizing the importance of support and protection of infrastructure, freight corridors and strategic land well by including:

- Global gateway, providing international freight connections servicing Greater Newcastle and the Hunter Region
- Capacity to generate port-associated industry and regional and local employment while
 planning for land use compatibility, acknowledging the high demands on land and
 infrastructure affecting surrounding lands and requiring a separation from adjoining land uses
 to sustain their success.

In addition, maintaining global connectivity and maximising opportunities for the Hunter relies on the coordination of strategies across NSW Government, working together supporting common objectives. The Plan must be reconciled with other Government plans and strategies, such as the Lower Hunter Freight Strategy, to ensure consistency of objectives and outcomes and importantly providing certainty to business and community.

The NSW Government's 2020 Strategic Statement on Coal highlights the important role coal mining and export will continue to play in the NSW economy over the coming decades. The strategy includes forecasts that show the current levels of global coal demand remaining relatively stable to 2050, with falls in some markets to be partially offset by increases in others. The coal industry in the Hunter relies on the connectivity to the global gateway of Newcastle Port and the Plan should recognise, support and protect supply chain infrastructure, freight corridors and strategic land as part of the value to NSW of global connectivity in the Hunter.



To:

noreply@feedback.planningportal nsw.gov au DPE PSVC Hunter Mailbox Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Friday, 4 March 2022 12:59:40 PM

Attachments: 20220304 port-waratah-submission draft-hunter-plan-2041.pdf

Submitted on Fri, 04/03/2022 - 12:58

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info

Email

Suburb/Town & Postcode

Carrington 2294

Please provide your view on the project

I am just providing comments

Submission file

20220304 port-waratah-submission draft-hunter-plan-2041 pdf

Submission

Please find attached Port Waratah Coal Services submission.

I agree to the above statement



Mr. Ben Holmes NSW Department of Planning, Industry and Environment Locked Bag 5022 PARRAMATTA NSW 2124

Electronic Lodgement: <planningportal.nsw.gov.au/draft-hunter-regional-plan-2041

Dear Mr. Holmes,

Re: Submission to the Draft Hunter Regional Plan 2041 – Other Holdings

I write to provide a submission to the Draft Hunter Regional Plan 2041 (the draft Plan).

This submission has been prepared by the up, who is a family-owned, Hunter based property group, who is currently staging the construction of more than 6,200 residential homesites across the Hunter, Central Coast, New England, and Northern Rivers regions of NSW.

The has prepared a separate submission for land at Wallalong. This submission is focused on land at Forster South, Thornton North, Lochinvar, Kings Hill, Medowie, and Kurri Kurri.

Summary

To assist the to continue with the delivery of housing, we would please request that the post-exhibition version of the Plan includes the following:

- Continued identification of the land collectively known as Forster South/Bert's Farm as a Proposed Urban Release Area (p.116),
- 2. Continued identification of 107 Haussman Drive, Thornton (Lot 2, DP 1145348) as 'Hunter ÚDP' (p.72), but that the draft Plan be updated to define HDP in the Glossary (p.124),
- 3. Identification of land to the immediate west of the existing Lochinvar Urban Release Area as a 'Potential Growth Area', not 'HEX interchange growth area' (p.70),
- 4. Continued identification of the Kings Hills URA as 'Hunter ÚDP' (p.72), but that the draft Plan be updated to define HDP in the Glossary (p.124),

- 5. Identification of land mapped as 'Residential' in the Medowie Strategy (p.9) as 'Hunter UDP' or 'Proposed URA' in the Draft Plan (p.65), and
- 6. Land in the Maitland Local Government Area at Regrowth -Kurri Kurri (364 Cessnock Rd) be amended from 'General Residential' to 'Residential zone (undeveloped)' (p.70).

The remainder of this submission provides the justification for the above recommendations.

Forster South

The supports the identification of the following land at Forster, which is identified 'Proposed Urban Release Area' (p.116) under the Draft Plan:

- Lots 1 to 7, DP 249361,
- Lot 1, DP 1229374, and
- Lot 50, DP 753168.

The identification of this land is consistent with the following land-use strategies:

TABLE 1 – Identification of Forster South in consecutive land-use strategies

No	Strategy	Comment
1	Mid-Coast Council, July 2021, Mid- Coast Urban Release Areas Report	The site is identified in this Report as an URA in the medium term 6-10 years (p.47)
2	Mid-Coast Council, December 2020, 'Mid-Coast Housing Strategy'	The site is identified in this Strategy as Potential Residential Land (p.31).
3	NSW Department of Planning, Industry and Environment, 2018, 'Hunter Regional Plan'.	The site is not specifically identified because the Plan only maps current URAs and Gateway Determination sites (p.52). However, Action 21.1 states: 'Focus development to create compact settlements in locations with established services and infrastructure, includingin existing towns and villages and sites identified in an endorsed regional or local strategy' (p.54). The wording 'endorsed regional or local strategy' was intended to capture the remainder of the Mid-

		Coast Regional Strategy 2006, which was identified as a 'Proposed Urban Release Area'.
4	NSW Department of Planning, 2006, 'Mid-Coast Regional Strategy'.	The Strategy identifies the site as a Proposed Urban Release Area (p.58).
5	Great Lakes Council, 2006, 'South Coast Structure Plan'.	The Plan identifies the site as a mixture of residential environmental and tourism uses (p.123).

The is currently preparing a planning proposal and separate development application to achieve a residential outcome on the site, so the continued identification of this site as having potential for residential development will assist with demonstrating 'strategic merit'.

Thornton North

The McCloy Group supports the identification of 107 Haussman Drive, Thornton, NSW, 2322 (Lot 2, DP 1145348) as 'Hunter ÚDP' (p.72) under the Draft Plan.

The would please request that 'Hunter UDP' be defined in the Glossary to provide further clarity to the significance of this identification. Our understanding is that its identification as 'Hunter UDP' makes it suitable to be developed for residential development because the site has been consistently identified for residential development in the following strategies:

TABLE 2 – Identification of Thornton North in consecutive land-use strategies

No	Strategy	Comment
1	Maitland City Council, 2020, 'Maitland Local Strategic Planning Statement'	The Statement identifies the site as Planning Investigation – Residential (p.25).
2	NSW Department of Planning, Industry and Environment, 2019, 'Greater Newcastle Metropolitan Plan'	The site is specifically identified as a Current Urban Release Area (p.52).
3	NSW Department of Planning, Industry and Environment, 2018, 'Hunter Regional Plan'.	The site is specifically identified as a current URA because it is already mapped as part of the Thornton North Stage 1 URA under the Maitland Local Environmental Plan 2011 (p.52).

4	Maitland City Council, 2012, 'Maitland Urban Settlement Strategy'	The Strategy identifies the site as Thornton North Stage 3, and rates it as Category 1 Residential Land, flagged for within 1-5 years (by 2017) (p.75)
5	Maitland City Council, 2011, 'Maitland Development Control Plan'	The DCP recognises the site as a residential area, with a strip of land identified for vegetation conservation along the southern boundary (p.78).
6	NSW Department of Planning, 2006, 'Lower Hunter Regional Strategy'.	The Strategy identifies the locality as a Proposed Urban Area with boundaries to be defined through local planning (p.12).
7	Parsons Brinkerhoff, 2003, 'Thornton North Master Plan'	The Masterplan identifies the site for future residential development, following the decommissioning of clay mining on the site (p.5).

A planning proposal is currently under assessment by Maitland Council for this site. The proposal was reported to Council on 8 February 2022 with the aim to seek a gateway determination from the State Government. The continued identification of this site as having potential for residential development will assist with demonstrating 'strategic merit'.

Lochinvar

The does not support the identification of HEX interchange growth area that extends to the western boundary of the existing Lochinvar URA under the Draft Plan (p.70). It also does not support the following statement:

'Prohibit rezoning for residential or rural residential development, other than land in a current proposal or future endorsed local strategy' (p.71)

The land to the west of this boundary is the logical extension of this existing residential URA. Consistent with other locations identified in the Draft Plan for future investigation, this land to the immediate west may be most appropriately identified as a 'Potential Future Growth Area'. This identification would then enable Council to nominate this locality under Appendix C: Infrastructure fire and place-based delivery of the Draft Plan for a Place Strategy.

The New England Highway Corridor has long been recognised as a regional planning priority, which is illustrated by the NSW Government's \$11.5M investment to upgrade the Wyndella Road intersection. The identification of land to the west of the existing Lochinvar URA as a 'Potential Growth Area' would allow resources to be focused on the continued long-term planning for the regional priority of Lochinvar as an ongoing URA.



The second is currently preparing a Development Application for lands adjoining the western boundary of Station Lane, so further certainty about the future of those lands to the west of the Lochinvar URA would lead to a more informed subdivision layout.

Kings Hill

The supports the identification of the Kings Hill URA as 'Hunter UDP' under the Draft Plan (p.64). However, it is unclear why lands on the western side of Newline Road are mapped as 'Hunter UDP' when the URA is limited to the eastern side of Newline Road.

The would please request that 'Hunter UDP' be defined in the Glossary to provide further clarity to the significance of this identification. Our understanding is that its identification as 'Hunter UDP' makes it suitable to be developed for residential development because the site has been identified for residential development since the Lower Hunter Regional Strategy 2006.

The currently has a Development Application for residential subdivision for lands within the Kings Hill URA, which are legally identified as:

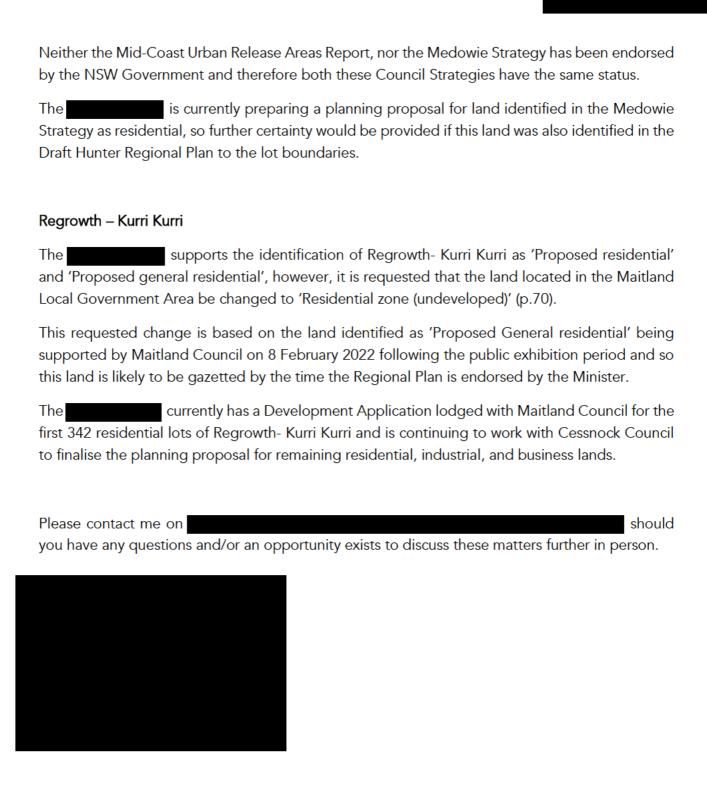
- Lot 32, DP 554875,
- Lot 2, DP 37430,
- Lot 9, DP 111433,
- Lot 32, DP 586245, and
- Lot 8, DP 111433

The identification of the Kings Hill URA will assist in achieving a residential outcome at Kings Hill.

Medowie

The supports the identification of Medowie as a 'Priority Location for future housing' but believes land identified in the Medowie Strategy as 'Residential' (p.9) must be mapped as 'Hunter UDP' or 'Proposed URA' in the Draft Plan (p.65).

This approach would be consistent with the Draft Plan identifying sites within the Mid-Coast Local Government Area as 'Proposed URAs' (p.116). The locations identified as 'Proposed URAs' are reflective of the Mid-Coast Urban Release Areas Report that was adopted by Council in August 2021. At the same time, Port Stephens Council has multiple Local Strategies that have also been adopted by Council (e.g., Medowie Strategy) that identifies future residential to the lot boundaries.



To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Friday, 4 March 2022 2:00:37 PM

Attachments:

Submitted on Fri, 04/03/2022 - 11:29

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info

Suburb/Town & Postcode

DANGAR

Please provide your view on the project

I am just providing comments

Submission file

Submission

Please refer to the attached.

I agree to the above statement

noreply@feedback.planningportal nsw.gov au DPE PSVC Hunter Mailbox From:

To:

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Friday, 4 March 2022 2:02:07 PM

Submitted on Fri, 04/03/2022 - 14:01

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name



I would like my submission to remain confidential

Info

Email

Suburb/Town & Postcode

Pindimar 2324

Please provide your view on the project

I am just providing comments

I urge the local and state government planning agencies to formulate a strategy allowing rezoning of non-urban land within the Mid Coast Council, NSW.

This should identify land that would be suitable for residential development in this LGA.

There is potential to increase the affordable housing stock in an area that is currently in short supply and enhance the already existing residential

Please engage the people who hold these properties and carefully consider his as a social rather than a commercial project.

Thank you,

I agree to the above statement



1 March 2022

Mr Daniel Simpkins Director, Central Coast and Hunter NSW Department of Planning and Environment PO Box 1226, NEWCASTLE NSW 2300

Via email: hunter@planning.nsw.gov.au

Dear Daniel

Subject: Lake Macquarie City Council staff submission - draft Hunter Regional Plan

2041

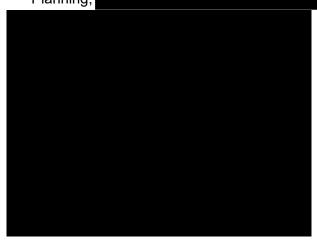
Thank you for the opportunity to provide feedback on the draft Hunter Regional Plan 2041 (draft Plan). Council staff have reviewed the draft Plan and have prepared the attached detailed submission.

The objectives and outcomes of the draft Plan are generally supported, however there are several high priority recommendations for Lake Macquarie City including the North West Lake Macquarie Regionally Significant Growth Area, adaptative reuse of former mining and other heavy industry land and the transition of Eraring Power Station infrastructure that require greater prominence in the draft Plan.

While the draft Plan seeks to provide a consolidated view of outcomes for the region, the coordinated implementation of these outcomes is of utmost importance. Lake Macquarie City Council is focusing its efforts and resources to the regionally important outcomes within our City, however it is critical to the future prosperity of the region that all government agencies are committed to and align their resources with the Plan to successfully deliver its objectives and outcomes.

Further discussions are necessary between relevant staff at NSW Department of Planning and Environment and Council before the Hunter Regional Plan is finalised. If an integrated approach is taken to planning for the future, Lake Macquarie City will be a key component and leading contributor to delivering the vision for the Hunter Region.

Should you require further information, please contact Council's Manager Integrated Planning,



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Detailed Submission – Draft Hunter Regional Plan 2041 – March 2022

This staff submission is structured in three sections:

- Section 1 identifies high priority issues and recommendations for changes to the draft Hunter Regional Plan;
- Section 2 provides other priority issues and recommendations; and,
- Section 3 provides specific comments and recommendations for particular parts of the draft Plan.

Appendices have also been attached for your information and consideration as referred to in the submission.

Council staff request further discussions with the Department of Planning and Environment in finalising the Hunter Regional Plan and in planning the future of Lake Macquarie City as a key component and contributor to delivering the vision for the Hunter Region.

1 High Priority Issues

There are several high priority issues in the draft Hunter Regional Plan that need to be addressed.

Recognition of North West Lake Macquarie as a Regionally Significant Growth Area

Regionally Significant Growth Areas and selected locations requiring place strategies or infrastructure delivery plans must reflect the aspirations identified in Council's Local Strategic Planning Statement (LSPS). Specifically, and despite previous feedback on early versions of the draft Hunter Regional Plan, the North West Lake Macquarie Catalyst Area is not adequately recognised in the draft Hunter Regional Plan. There must be a commitment shown by the State Government to follow through on delivering the North West Lake Macquarie Catalyst Area identified in the Government's own Greater Newcastle Metropolitan Plan. In this regard, the North West Lake Macquarie Catalyst Area must be identified as a Regionally Significant Growth Area in the Hunter Regional Plan along with actions to realise the significant opportunities it presents for economic development and community benefit for Lake Macquarie and the Hunter Region.

A key precinct in the North West Lake Macquarie Regionally Significant Growth Area is the former West Wallsend Colliery land immediately to the west of Cockle Creek and the suburb of Teralba. The area presents a significant adaptative reuse opportunity and Council officers' initial high-level analysis of the site has identified up to 755Ha of developable land that has the potential to support 20,000 dwellings, tens of thousands of jobs and generate tens of billions of dollars of economic activity.

Identifying the North West Lake Macquarie Regionally Significant Growth Area in the Hunter Regional Plan is in addition to the Morisset Regionally Significant Growth Area, which is supported.

Please refer to Appendix A for suggested content for the Hunter Regional Plan.

Post mining land use in Lake Macquarie

Despite the significant opportunities of several former mine sites and the forthcoming closure of others in Lake Macquarie, the draft Plan fails to adequately recognise postmining activity in the City. The draft Plan appropriately identifies the adaptative reuse of former mining sites elsewhere in the Hunter as an important aspect of economic resilience and diversity, however this also applies to Lake Macquarie. The former West Wallsend Colliery, which is identified in the Lake Macquarie LSPS as a Future Growth Investigation Area and adjoins the North West Lake Macquarie Catalyst Area, should be identified in the Hunter Regional Plan as an important location for adaptative reuse of former mining land. This site presents significant opportunities for economic reuse given the availability of infrastructure (rail loop, power, water and sewer services) to these sites and their strategic location near existing population and other infrastructure such as the proposed Hunter Freight Bypass, national highway system and passenger rail network, including a future fast rail station.

Eraring Power Station site as a District Priority

The recent announcement to close Eraring Power Station up to seven years earlier than previously planned will cause significant impacts on employment and the local and regional economy.

The 1100Ha site is well connected to the national power grid, is close to the national rail and road network and is connected to mine sites along western Lake Macquarie by a private haul road. The closure will mean the direct loss of almost 500 high-skilled jobs and many more indirect jobs in the region. Council resolved on 21 February 2022 to work with the State Government to plan the transition of the site away from coal-fired power generation with the objective to replace the jobs the site once generated with an equal or greater number of jobs in smart industries, renewable power generation and the circular economy.

The Eraring Power Station site needs to be identified as a district priority in the Central Lakes District of the Hunter Regional Plan. The Hunter Regional Plan also needs to commit to the preparation of a place strategy that is funded by Government with support from Origin Energy. The importance of the Eraring Power Station site also needs to be reflected in the mapping associated with Central Lakes District.

High Priority Recommendation 1:

- a) Recognise and identify Lake Macquarie North West Catalyst Area as a Regionally Significant Growth Area given its potential for State significant economic development and employment generation (objectives and planning principles attached see Appendix A).
- b) Recognise the importance of the transition of former mining areas in Lake Macquarie, particularly the economic reuse of the former West Wallsend Colliery, which is identified as a Future Growth Investigation Area in the Lake Macquarie LSPS.
- c) Identify West Wallsend Colliery as significant post-mining adaptative reuse opportunities requiring a place strategy
- d) Identify Eraring Power Station as a district priority as part of the Central Lakes District

LMCC Page 4 of 24

Infrastructure First and Place-based Delivery

Improved and streamlined planning processes are supported in principle and the implementation of place strategies and infrastructure delivery plans is supported if improvements are made and these can be shown to be beneficial.

Improvements are required to the proposed approach to deliver place strategies and infrastructure delivery plans. The proposed process in its current form appears to replicate existing land-use investigations that typically occur through the rezoning process, although without benchmark timeframes and without the land being rezoned. If the planning investigation is taking place, it may as well result in zoning the land (or other LEP amendments) according to the findings of those investigations. Care should be taken to ensure the planning process does not become more cumbersome as a result of the proposed process and there is concern it may negatively affect current planning projects or impact the progression of good development if it is applied too rigidly.

It appears adding another layer of plans will further complicate the planning system and create inefficiencies. Given the recent endorsement of LSPSs, it is difficult to see the purpose and value of additional plans that don't result in any tangible change and have questionable status. If place strategies and infrastructure delivery plans are introduced, perhaps these should form amendments to LSPSs. Although, as mentioned, this seems to make the planning system more cumbersome and less efficient.

As with the rezoning process, the proposed approach leaves councils reliant on proponents to fund investigations to enable land-use changes. The process would benefit from State Government funding to enable councils to more actively pursue strategic goals and outcomes.

The proposed process seems to reinforce an ongoing assumption and bias towards greenfield development to cater for growth of our cities. A process must be established to elevate key urban consolidation growth areas, such as the North West Catalyst Area, Morisset and Charlestown, to achieve holistic planning outcomes outlined in the vision of the draft Hunter Regional Plan and the strategic objectives of Council's LSPS. This must also recognise the varying infrastructure needs for urban consolidation growth areas that may include retrofitting public gathering spaces and/or embellishment of public places, community facilities, improved pedestrian and cycling environments, public transport infrastructure, landscaping and/or street trees. The process must ensure mechanisms are in place to enable funds to be raised to deliver these types of infrastructure that are necessary to support healthy vibrant communities and economic development. The recent development contributions reforms appear to work against this, and against the vision articulated by the draft Plan, by being too restrictive in the types of infrastructure and facilities that can be levied for.

It is also not clear who is actually responsible for preparation of a place strategy or infrastructure delivery plan or the funding and delivery of infrastructure. If there is an expectation on councils, State Government funding support is required to enable this to be resourced and delivered.

Concern is raised about the proposed ability of the Urban Development Program Committee to make decisions regarding the sequencing of land release given its current membership contains development industry representation. This could result in potential conflicts of interest (whether actual or perceived) which will have to be managed. To support community confidence in the planning system, it is crucial for the Committee to be accountable and for decision making to be transparent, merit based and in the public interest.

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High Priority Recommendation 2:

Revise the Infrastructure First Place-based Delivery process to:

- a. streamline planning processes to support urban consolidation and infill development growth outcomes.
- b. provide a genuine streamlined process that does not simply replicate existing rezoning investigations.
- c. provide an appropriate funding mechanism to enable councils to more actively pursue strategic goals rather than relying on proponents to fund planning investigations.
- d. establish mechanisms for adequate funds to be raised to deliver diverse infrastructure and facilities to meet community needs.
- e. clarify roles, responsibilities and provide State funding of investigations, preparation of plans, and delivery of infrastructure. ensure decision making about sequencing of land release is merit based and in the public interest.

2 Other Priorities

Recognition of Charlestown Strategic Centre and extension of the Mine Grouting Fund

Charlestown is a very important strategic centre in the Greater Newcastle District with significant opportunities for growth and should be identified as a District Planning Priority along with actions to enable realisation of its potential. Please refer to Council staff feedback on the pre-exhibition version of the Plan for justification and detail on what the Hunter Regional Plan should include regarding Charlestown. Actions for the Charlestown District Planning Priority should include extension of the Mine Grouting Fund to Charlestown to support development certainty.

Key Recommendation 1:

Identify Charlestown under District Planning Priorities including the need to expand the Mine Grouting Fund to Charlestown to enable realisation of its development and growth potential.

Coordination of future planning for Central Lakes District

The Central Lakes District spans the Central Coast and Hunter regions and covers two local government areas. While the idea of the Central Lakes District is supported because it takes a holistic view of the planning and development issues that are common across this sub region, the coordination of planning activities across the jurisdictions is not mentioned in the draft Plan but is critical to the successful delivery of outcomes for the district.

It is recommended terms of reference be prepared for a coordination group, or similar, to be established comprising staff from Lake Macquarie City Council and Central Coast Council along with officers from the NSW Department of Planning and Environment and Transport for NSW. Other agencies like Department of Regional NSW could also participate as needed.

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Key Recommendation 2:

Establish a steering group comprising staff from Lake Macquarie City Council and Central Coast Council along with officers from the NSW Department of Planning and Environment and Transport for NSW to ensure planning and actions are coordinated to deliver the desired outcomes for the district.

Delivery of the Vision

The vision and objectives of the draft Hunter Regional Plan are aligned with Council's LSPS and Housing Strategy including a greater focus on urban consolidation in and around centres, housing diversity, walkable neighbourhoods, quality public places and green infrastructure, and access to jobs and services, as well as conservation of important biodiversity and natural areas. As a result, the vision and objectives of the Plan are supported, however, these are unlikely to be realised without clear State Government action to unlock identified growth areas and infill development. Funding support is also necessary for the improvement of existing urban environments and delivery of infrastructure and community facilities. It is not clear how the draft Plan aligns with the Minister's Planning Principles and there appears to be no indication of how the strategies will be implemented. There is little relationship between the strategies and actions of the draft Plan.

Key Recommendation 3:

The vision of the draft Hunter Regional Plan is unlikely to be realised without clear State Government action. There needs to be a clear line of sight between the vision of the Plan and actions for how this will be achieved.

Regional Transport and Conservation Planning

Despite the draft Hunter Regional Transport Plan currently being prepared, there is no clear relationship or discussion about the draft Hunter Regional Transport Plan despite recognition of the critical inter-relationship between transport and land-use planning. It would have been best for both documents to be on exhibition together so the relationship between the two plans could have been examined. It is important for the region that the Hunter Regional Transport Plan and the Hunter Regional Plan are closely related and support shared goals. Council recommends that the draft Hunter Regional Plan not be finalised until stakeholders have had the opportunity to review and provide feedback on the draft Hunter Regional Transport Plan.

The Hunter Regional Plan would benefit from being informed by a Regional Conservation Plan to better ensure protection of natural resources and ecological attributes. Without a conservation plan for biodiversity, the residents of the Region are in danger of losing many of the natural resources and ecological attributes that they value. These attributes provide for a healthy region with great attractions. The Hunter Regional Plan should retain the past NSW Government commitment to a strategic conservation plan for the region. This is essential to underpin future development and provide economic and investment certainty. It is also a key element in making the Hunter Region a desirable place to live.

Regional conservation planning could follow the approach in the Cumberland Plain Conservation Plan currently being finalised by the State Government in Sydney. The scope of what is required for regional conservation planning is outlined in Lake

LMCC Page 7 of 24

Macquarie City Council's discussion paper on strategic conservation planning dated 20 May 2021.

Key Recommendation 4:

- a. The Hunter Regional Plan needs to reference the Hunter Regional Transport Plan and these two Regional Plans need to be aligned to achieve the shared regional goals.
- b. Include a new action to prepare a Regional Conservation Plan taking into consideration the LMCC discussion paper on strategic conservation planning (see Appendix B).

Performance Monitoring and Reporting and Utility of the Plan

The Hunter Regional Plan would benefit from clearer direction around how the objectives will be achieved and how State Government performance will be measured and reported. It is a risk to the success of the Plan if there is not an understanding of how objectives will be achieved, the roles and responsibilities for delivery, and how actions will be resourced.

The draft Plan is lacking clear concise planning principles that development or planning proposals can be considered against. The Plan would benefit from specific guidance in this regard to support its utility and implementation in practice.

Key Recommendation 5:

- a. Establish a performance monitoring and reporting framework to ensure accountability of State Government in delivering its Regional Plans.
- b. Introduce clear planning principles for consideration when undertaking assessments.

3 Section Specific Comments and Recommendations

A Regional Plan for the Hunter (p8) – part of the NSW 'Six Cities'.

The plan should mention and have some discussion about the Greater Sydney Commission's announcement of 'Six Cities' for NSW and the proposed Hunter City Commission and what that means for the Region and the Hunter Regional Plan.

Specific Recommendation 1:

The draft Plan should mention and have some discussion about the relationship between the Hunter Regional Plan and NSW's Six Cities concept.

<u>United Nations Sustainable Development Goals (p9)</u>

While it is positive to see reference to the SDGs in the document, it is noted that the SDGs listed in the Plan are incorrectly numbered (should be 6,7,10,11,13 & 16).

It is also noted that the document neglects to reference SDG 15 (Life on Land) despite the obvious connections of the Plan with terrestrial biodiversity. Also, the plan neglects to include SDG 14 (Life below Water) which is confusing given the high level of connection with water quality, aquatic ecosystem health and the Region's significant waterways.

LMCC Page 8 of 24

With regards to presentation, the document would be improved if it were to use the official SDG icons in a manner consistent with 'Guidelines for the use of the SDG Logo including the colour heel and 17 Icons' rather than the stylised version currently used in the document.

Specific Recommendation 2:

The draft Plan should be amended to use the correct numbering for Sustainable Development Goals (the numbering in the draft plan is incorrect), also include consideration of Goals 15 (Life on Land), 14 (Life below Water) and also present this information in a manner consistent with the UN's quidelines.

What are the big ideas (p11)

It is noted that this section omits reference to 'resilience' despite the concept of resilience being widespread and known to have a high level of applicability to the Region and its planning. The Plan references 'resilience' as one of the Hunter Regional Plan's Principles, and within objective 6, but does not refence the concept in the 'big ideas' section.

Specific Recommendation 3:

Amend the 'What are the big ideas' section of the Plan to make reference to resilience, and concept of 'resilience by design'.

Circular Economy (p23)

While it is positive to see reference to the circular economy, the manner in which this information is presented could be significantly improved. The current draft Plan suggests that circular economy is primarily relevant to mining energy and industrial capacity, rather than being an underpinning principle for the future of the Region.

The diagram on page 23 that describes the circular economy is not ideal and could be significantly improved.

Text is provided on page 24 regarding implementing a transition to the circular economy, being: "The Hunter Joint Organisation, with funding from the NSW Government, is rethinking waste and resource recovery in the Hunter and Central Coast, including a Circular Economy Ecosystem webpage. Lake Macquarie Council in collaboration with Hunter Joint Organisation and other councils undertook a regional circle scan (the first in Australia) that helps us understand the flow of materials that would support circular economy initiatives."

This text seems out of place in a regional land-use plan and does not encompass the entirety of work currently occurring in the region to transition to a circular economy.

Specific Recommendation 4:

- a. It is recommended that this section be modified to emphasise that circular economy is an underpinning principle for the future of the region (especially for housing and infrastructure) and not only relevant to mining, energy and industrial capacity.
- b. The diagram and text describing circular economy and responses should be updated to convey a more accurate picture of circular economy principles and their implementation in the region.

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Post-mining land use principles (p25)

The draft Plan fails to adequately recognise active and past mining activity in Lake Macquarie. The draft Plan seeks adaptative reuse of former mining sites elsewhere in the Hunter as an important aspect of economic resilience and diversity. This also applies to Lake Macquarie. The former West Wallsend Colliery, which is identified in the Lake Macquarie LSPS as a Future Growth Investigation Area and adjoins the North West Lake Macquarie Catalyst Area, should be identified in the Hunter Regional Plan along with other Lake Macquarie mine sites. These sites present significant opportunities for reuse given their strategic location near existing population and infrastructure.

While there are reuse opportunities, there are also site constraints resulting from mining activity including depths of fill, coal reject and overburden being deposited and not compacted in a way that would allow future development as well as mine workings limiting building heights. Any new or expanded mines and even existing mines need to ensure this does not continue to occur into the future and the strategies in the draft Plan should be stronger on this. There is also no indication of how the strategies in the draft Plan will be implemented and Action 1 does not appear to relate well to Strategy 1.2 as it deals with facilitating changes of use of the land after mining.

Site compatibility mechanisms are not suitable strategic planning mechanisms for dealing with large sites and scales. Mines should consider their holdings in a strategic way and go through thorough appropriate investigations and public consultation to determine suitable alternative and adaptive uses for brownfield sites. Site compatibility mechanisms circumvent these processes and reduce opportunities for community involvement which is contrary to the strategy.

Action 1 appears to have little context or justification within the Plan. In particular, the benefits should be explained of allowing non-permissible uses and subdivision of mining land as opposed to undertaking a normal rezoning process which systematically assesses the land use potential of the site. Justification of this action should explain why a better strategic outcome is achieved through a site compatibility process, which has historically delivered poorer strategic outcomes, especially when the long lead-times inherent in mining projects is considered.

The post-mining land use principles should include strategies relating to the retention and enhancement of areas of high environmental value as many mines have ecologically significant land that have not been used for mining. They also have biodiversity offset lands that should become part of a future connected green network. Ongoing security and management of these lands is an issue that will need to be dealt with as mines close.

Specific Recommendation 5:

- a. Recognise active mining and post-mining transitions in Lake Macquarie, particularly the reuse of the former West Wallsend Colliery, which is identified as a Future Growth investigation Area in the Lake Macquarie LSPS.
- b. Justification for Action 1 (enacting site compatibility mechanisms for mining land) should be included to explain how a better strategic outcome is achieved through a site compatibility process (compared to a rezoning), or the action should be removed/modified.

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Heritage (p27)

The current draft Plan appears not to recognise or address issues around the identification and management of local and State heritage items and heritage values. If the Regional Plan is to be "culturally informed" it needs to improve the identification and conservation of non-Aboriginal heritage values as well. The Plan has recognised that housing development in the Hunter will need to "protect national, state or local environmental and cultural values;" but fails to outline how non-indigenous heritage values will be protected in the Hunter Region and Lake Macquarie local government area.

Specific Recommendation 6:

The Plan should outline how heritage values will be protected through the implementation of the Hunter Regional Plan.

Designing for longevity, adaptability or flexibility (p26)

Page 26 of the Plan indicates that *A building will typically be designed to last for 100 years or more.* This statement should be considered in the context of sea-level rise and predicated inundation of low-lying areas, where standard residential housing is assessed as having a shorter asset life (ie. 50 years). If consent authorities were to assess standard residential dwellings applying a 100-year asset life, this has the potential to result in sterilisation of large areas of low-lying land due to sea-level rise projections for many areas (especially in eastern Lake Macquarie).

Specific Recommendation 7:

Amend the wording of the 'Designing for longevity, adaptability or flexibility' section to make specific reference to the predicated impacts of sea-level rise for many low-lying areas in the region and adaptable building design.

Regional housing benchmarks (p39)

The rationale for having a 70 per cent infill ratio for the 'Coastal District' yet only a 60 per cent infill ratio for the 'Central Lakes District' seems inconsistent with the settlement patterns of these areas. The Coastal District contains communities such as Crowdy Head, Harrington, Old Bar, Diamond Beach, Hallidays Point, Pacific Palms, Hawks Nest and Tea Gardens and it is not clear why these areas are more suited to infill housing than the Central Lakes District that includes areas such as Morisset.

Specific Recommendation 8:

Clarify the reasons for the selection of infill/greenfield ratios and amend the Central Lakes ratios to be consistent with Greater Newcastle.

Potential future growth areas and Figure 2 'Housing' (p40)

Including Wyee as a 'potential future growth area' is not supported. Wyee is identified as a growth and intensification area in the Lake Macquarie Local Strategic Planning Statement, has a train station that the State Government has recently upgraded, Hunter Water has recently extended the reticulated sewer network to the area which has been sized to accommodate residential growth, it has potable water supply, has ready access to the M1, is close to employment areas, and its future growth has been

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considered as part of the Wyee Structure Plan that was adopted in 2010. Large-scale residential development is currently underway and Council is also currently working on Planning Proposals for further residential development in the area.

Specific Recommendation 9:

Remove the Wyee 'Potential future growth areas' symbol from Figure 2 on page 40.

Biodiveristy Values (p47) and Objective 5: Increase green infrastructure and quality public spaces and improve the natural environment (p44)

Objective 5 is attempting to address two separate issues, being

a; the preservation of biodiversity, remnant vegetation and corridors - which are primarily associated with undeveloped land, and

b; the provision of green infrastructure and quality public spaces in urban areas.

As a consequence, the objective is limited in its effectiveness and better outcomes would be achieved by splitting objective 5 into two objectives, being:

- 5a; Increase green infrastructure and quality public spaces
- 5b; Improve the natural environment

The strategies for Biodiversity values (Biodiversity values Strategies 5.8 and 5.9 (p47)) are supported however, they should be strengthened by requiring the implementation of mechanisms to secure tenure and management for areas of high conservation value and native vegetation corridor connections.

Given the importance of biodiversity issues for the region, it is insufficient that only a single action (*Action 2 – consider opportunities to undertake further strategic conservation planning in Morisset*) has been included to address regional biodiversity. The lack of a Regional Conservation Plan has been highlighted by local councils and the development industry for many years and the lack of an action in the draft Plan to prepare a Regional Conservation Plan is viewed as a significant omission.

The draft Plan also fails to recognise the Awaba Conservation Area and the Lake Macquarie Wetlands Park that are identified in Council's LSPS.

Specific Recommendation 10:

- Amend objective 5 by splitting it into two separate objectives being:
 5a; Increase green infrastructure and quality public spaces
 5b; Improve the natural environment
- Include a new action to prepare a Regional Conservation Plan
- Strengthen the implementation mechanisms for strategies 5.8 and 5.9.
- Identify the Awaba Conservation Area and the Lake Macquarie Wetlands Park in the Hunter Regional Plan.

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Public space and urban greening (p46)

The details on public space and urban greening contained in the draft Plan are supported. However, the Plan fails to articulate the significant barriers to implementation that exist in our region in relation to funding as the Hunter is currently excluded from applying for funding through with the NSW 'Greenspace' or 'Greening Our Cities' programs (which are restricted to the Sydney metro area). Long-term management of additional green infrastructure will have a financial impact in terms of maintenance, refurbishment and replacement. An additional strategy is required, focused on the establishment of sustainable financial models to ensure continuity of green infrastructure provision and the incorporation of green infrastructure (including trees) into existing asset management frameworks.

Specific Recommendation 11:

It is recommended that an additional Action be added to public space and urban greening section of the Hunter Regional Plan for the NSW Government to expand the eligibility of the NSW 'Greenspace' and 'Greening Our Cities' grant programs to include the Hunter region.

An additional strategy be created under the public space and urban greening (p46) section of the Plan focused on the inclusion of green infrastructure into sustainable financial mechanisms, and incorporation of green infrastructure into the existing asset management frameworks.

Sustaining regional habitat connectivity (page 48)

This section contains paragraphs that read as though development is being prioritised in the Jilliby and Watagan habitat linkages. These sections should deal with avoiding and minimising the impact of development on habitat connectivity recognising that such linkages are not able to be offset and are irreplaceable. There are many examples overseas where major infrastructure has used either land bridges or infrastructure on piers to retain habitat corridors. The draft Plan would benefit from the inclusion of a map at least conceptually depicting the regional habitat connectivity. Without this, it is not possible to clarify where such linkages might be.

While the importance of regional biodiversity corridors as identified in the document is recognised, it is important to acknowledge that local biodiversity corridors are also essential to the preservation of biodiversity and native species, and the document would benefit by recognising the importance of local biodiversity corridors.

A hierarchy of habitat corridors is required for successfully linking landscapes and habitat types.

Specific Recommendation 12:

Identify habitat corridors including regional as well as local corridors as well as the importance of protecting these.

Waterways and drinking water catchments (page 49)

The concept of 'Water Sensitive Cities' is a high priority for numerous local councils and government agencies in the region.

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Specific Recommendation 13:

The Plan should articulate the aspiration for water sensitive cities and communities and include specific content on this topic.

Coastal management (page 49)

This section contains minimal detail despite the importance of coastal hazards in the Region (identified as having some of the nation's most vulnerable communities for coastal inundation). Additionally, the importance of estuaries (including coastal lakes) has long been recognised as providing many opportunities and constraints to development in the region, and estuaries are not referenced at all in the draft document.

It is also recognised that the draft Plan does not attempt to embed linkages with the NSW Marine Estate Management Strategy or reference the comprehensive Threat and Risk Assessment that was undertaken through the Marine Estate processes.

Specific Recommendation 14:

The coastal management section of the draft Plan should be re-written in partnership with the Coastal Management staff within the Department of Planning and Environment (DPE), to more accurately reflect the extent of coastal hazards in the Region (especially coastal inundation), the importance of the Region's estuaries, as well as include linkages with the NSW Marine Estate Strategy.

Objective 6: Reach net zero and increase resilience and sustainable infrastructure (page 50)

The theme of achieving net zero and making climate change a guiding principle for all planning decisions is strongly supported, but the Plan lacks effective implementation measures to achieve this. The 'Hunter's net zero emissions spatial plan' should be articulated to describe what this plan is, how it is used, and how it is measured and reported. If the intent is to develop and exhibit the 'Hunter's net zero emissions spatial plan', an action should be included in the Regional Plan to achieve this.

The draft Plan also fails to adequately consider transport strategy and planning. This is a key issue in achieving zero net carbon emission land use.

Specific Recommendation 15:

Include an action in the Hunter Regional Plan to prepare and exhibit the 'Hunter's net zero emissions spatial plan' and that this spatial plan includes:

- specific measures that can be practically used in land-use planning (including consideration of carbon emissions from land clearing)
- identifies reduction targets for various land uses
- mechanisms for the emission reductions to be measured and reported.

The Hunter Regional Plan should be integrated with State Government Transport Strategy to ensure land use and transport are considered together and to support achievement of net zero and resilience outcomes.

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Community resilience to natural hazards (page 52)

The Region contains some of the nation's most vulnerable areas to the predicted impacts of sea level rise and coastal inundation. This is a significant planning issue for Lake Macquarie and this high level of vulnerability should be included and specifically addressed in this section of the Plan.

Specific Recommendation 16:

Amend the 'community resilience to natural hazards' section of the Plan to make specific reference to sea level rise and coastal inundation.

Air quality and transport emissions (page 52)

Strategy 6.4 states: "Large growth areas and developments have a significant opportunity to improve local air quality through the design process. Planning authorities and proponents should apply a standard of improving air quality to the development of place strategies and other place planning frameworks."

Evidence indicates that large growth areas and development will result in reduced air quality. However, the design process provides the opportunity to minimise the impact to air quality.

Specific Recommendation 17:

It is recommended that strategy 6.4 is reworded as follows: "Large growth areas and developments have the opportunity to reduce air quality impacts through the design process. Planning authorities and proponents should apply a standard of maintaining air quality to the development of place strategies and other place planning frameworks."

Figure 10 Hunter Expressway Corridor (page 72) and Figure 11 National Pinchpoint plan (page 74)

These figures should be corrected to depict National Park Estate (not yet gazetted as National Park) that was dedicated to the State Government as part of the approval under Part 3A of the EP&A Act 1979 of residential development between Northlakes and Minmi (in the north and north west of Lake Macquarie and south west of Newcastle). Other land in this area is to be dedicated to Council as part of the Cameron Park Drive, Northlakes and Link Road developments.

These lands appear to be mapped as State Forests or open space in Figure 11 and have been labelled environmental zone in Figure 10. The future development potential of this area is limited due to:

- topography
- the existence of habitat corridors between and around existing development and
- biodiversity offsets that have been provided for development that has already occurred in the Northlakes and Link Road area.

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It is critical that habitat corridors and areas set aside for development are not eroded by the proposed interchange. The Regional Plan should clearly reinforce conditions of approval granted under Part 3A.

Specific Recommendation 18:

Consider and incorporate recommendations above.

Newcastle Mines Grouting Fund (p65)

The Newcastle Mines Grouting Fund has played an important role in addressing market failure caused by uncertainty associated with mine grouting in Newcastle CBD. The development challenges experienced in Newcastle CBD due to the uncertainty associated with mine grouting are also present in other parts of the Hunter affected by underground mining. The planned government review of this fund in 2022 is supported and the scope of the review should be to investigate expanding the fund to other strategic centres, firstly, to Charlestown, then elsewhere in the Greater Newcastle District and other Strategic Centres across the region.

Specific Recommendation 19:

Amend the Hunter Regional Plan to investigate the expansion of the Newcastle Mines Grouting Fund to Charlestown and other strategic centres in the region.

Figure 13: Post-mining land use (page 77)

Alternative post-mining land uses should consider conservation of biodiversity as a potential future use and how this can support other alternative uses. For some areas, rehabilitation may be the only alternative and these areas should contribute to the green space and habitat corridor network. There are other areas owned by the mines that have been required to be set aside as biodiversity offsets. These areas have significant biodiversity values that should also be connected. Figure 13 – should depict any biodiversity offsets that have been required to be provided for mining expansion and operations.

Specific Recommendation 20:

Consider and incorporate recommendations above.

Figure 15 Central Lakes District (page 84), Figure 17 and Figure 20 (page 94)

The figures should depict biodiversity corridors for both the Morisset and Central Coast areas and in particular include linkages between the LGAs. These have been mapped, are easily incorporated, and would take advantage of incorporating the Central Lakes Area into the Hunter Regional Plan.

Specific Recommendation 21:

Consider and incorporate recommendations above.

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Figure 15 Central Lakes District (page 84) and Figure 19 (page 92)

Apart from the National Park area, the light green is labelled open space. This is potentially misleading as open space has connotations of recreational use. The lands that are labelled "open space" are mapped native vegetation habitat corridors and form a network of green space interspersed with the growth area.

Specific Recommendation 22:

The map should be amended to reflect the habitat corridors and biodiversity values.

Central Lakes District (page 85)

Clarity is required about the land to which the draft Plan applies. The draft Plan currently includes Morisset in the Central Lakes District. The draft Central Coast Regional Plan also includes a section on the Central Lakes District, however, there appear to be some inconsistencies between the draft Hunter Regional Plan and the draft Central Coast Regional Plan. For example, the biodiversity avoidance framework included in draft Central Coast Regional Plan should also apply to the draft Hunter Regional Plan. Clarity should be provided about which land the draft Plan applies to and inconsistencies rectified.

The text refers to Morisset becoming a City Centre rather than a Strategic Centre as indicated on Figure 15. The last paragraph mentions "a regional biodiversity corridor linking the coast at Lake Munmorah to the mountains via a corridor between Morisset and Wyee." The corridor concept is supported, however, given the description and the geography, it is difficult to envisage where this corridor might be. A map is required to depict this corridor or the text needs to be reviewed. The document indicates that there is the opportunity to "create" a green break around Morisset and Cooranbong. The green breaks and corridors are largely already established consisting of existing native vegetation so the Plan should be worded to "secure, protect and enhance" these corridors.

When dealing with the transition of power stations, the Plan should acknowledge the potential of power stations in Lake Macquarie (as has been done for Lake Munmorah Power Station). Eraring and Vales Point contain significant opportunities for reuse and also contribute to the biodiversity of the district and Region. The Plan should provide for areas of high biodiversity value around power stations to be secured protected and enhanced and form part of the green network. Some of these buffer zones have been used as biodiversity offsets for Part 3A approvals. LMLEP 2014 highlights parts of the Power Station buffer areas of high environmental/biodiversity value with a "Terrestrial Biodiversity" layer.

P87 and Figure 16 should reflect that precinct 32 (west) is already fully serviced, as per previous advice to DPE. Remove precinct 32 from the sequencing plan table on page 86

As per previous advice to DPE, P86 and Figure 16 need to split precinct 32 (east) into employment/private recreation (north) and residential (south), respectively, to reflect the proposed manufactured housing estate to the south, and the now approved Cedar Mill entertainment venue to the north.

P86 Residential precinct 27 (investigation) in the sequencing plan table needs to refer to "Residential/Employment (investigation)" and, similarly for other proposed precincts, is subject to the outcomes of investigations to progress the Morisset Place Strategy.

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Precinct 27 is identified for "residential" in Figures 16 and Figure 19. The test on P93 refers to investigation of this area for expanded urban services (employment).

P86 Employment precinct 37 (investigation) is listed as long term. Council recommends this be listed as medium term based on industry interest in additional industrial land in Morisset.

P86 Residential/Employment precinct 28 is missing from the sequencing plan table. Insert into medium term.

P86 and Figure 16 does not identify existing Crown land zoned R2 on Awaba Road, currently subject to an Aboriginal land claim. The map should be updated to reflect this precinct and the sequencing plan table updated to reflect the precinct as medium term.

P86 and Figure 16 do not reflect the conversion of certain lots currently zoned RU4 Small Lot Primary Production on Marconi Road to R2 Low Density Residential, as per previous advice provided to DPE. This is consistent with the proposed 15-minute planning principle and Council's recent citywide review of RU4 land. This review included engagement with landowners.

The boundaries of precincts 31 and 29 in Figure 16 are inconsistent with the current RU6 Transition zone.

Figure 16 references the "Morisset Structure Plan". The depicted boundaries differ to the current Morisset Structure Plan 2008. The map should reflect the proposed boundary of the Morisset Place Strategy and the legend updated to reference the Morisset Place Strategy. The south eastern boundary of the Place Strategy should incorporate the Morisset Hospital site, Lake Macquarie Conservation Areas and relocated Myuna Bay Sport and Recreation Centre to align the Place Strategy scope with current stakeholder discussions and the broader vision for Morisset. Similarly, the south-west boundary of the Place Strategy should include Lot 4 DP 324031 17 Crooks Road, Mandalong.

Figures 16 and 19 need to identify land immediately north of Morisset train station as a location for the proposed Morisset Community Hub and town centre activation project. The Morisset Hospital Site should be identified as a sub-precinct for revitalisation and improved public foreshore access. Figures 16 and 19 also need to show the site of the relocated Myuna Bay Sport and Recreation Centre.

P92 Figure 19 needs to be updated to be consistent with changes to Figure 16.

Figure 16 should include an 'inset' map in the top left-hand corner that identifies the 1100 ha Eraring site as a District Priority, as per recommendations elsewhere in this submission. Figure 17 should include an 'inset' map in the top left hand corner showing Wyee and the proximity of the current residential growth areas to the Bushells Ridge Road employment land.

P91 Biodiversity Corridor – if this is referring to the Central Lakes district then there will be more than one Biodiversity Corridor. One corridor would be insufficient to achieve the objective of adaptation and movement of wildlife between mountains, lakes and ocean. Lakes should be included as elsewhere the draft Plan mentions corridors from the Lake to the mountains.

Figure 19 Morisset regionally significant growth area – green areas that appear to be labelled open space are of high environmental/biodiversity value and are part of the corridor network. The major east west corridor from Lake Macquarie to the Watagans is the large green area south of the areas mapped for investigation. The map could be amended by changing "open space" to "biodiversity corridor network" in the legend.

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Figure 19 requires review so that it clearly illustrates the text on P 93.

P93, the reference to Item 1 Morisset M1 Interchange Food Production Precinct should be updated to the Morisset M1 Interchange Gateway Corridor, reflecting land and multiple precincts west of the M1 and east of the M1 to Ourimbah Street. The subheader 'Item 2 Morisset M1 Interchange Employment Precinct' should be deleted and the dot points moved to the updated Item 1.

P93 – Delete reference to 'Morisset Urban Area' and move the dot point concerning mixed-use opportunities to beneath Item 4 Morisset Central Precinct. Items on P93 are recommended to be re-ordered such that the current 'Item 4 Morisset Central Precinct' is placed first in the list, to reflect strategic importance, followed by the current Item 1 and 2 (refer above, now the M1 Interchange Gateway Corridor). As per previous advice, remove reference to 'Koompahtoo' and replace with 'Biraban' for Item 6 Urban Expansion Areas. Delete Item 7 Morisset Golf Club and incorporate dot point beneath the new M1 Interchange Gateway Corridor. The Morisset Hospital Site should be identified as a sub-precinct for revitalisation and improved public foreshore access. Figures 16 and 19 also need to show the site of the relocated Myuna Bay Sport and Recreation Centre.

The labelling of some of the Biraban land as "Investigation subject to ecological assessment' is unnecessary as all the land zoned RU6 requires ecological assessment. The Investigation areas to the west of the M1 also require detailed ecological assessment. Marconi Road and the wastewater treatment plant are not marked on Figure 16 or 19.

P93 Point 3 conservation area should include text to the effect of retain and enhance areas of high environmental/biodiversity value and incorporate these into a network of habitat corridors and conservation areas. A strategic approach is the favoured approach to achieving this.

Specific Recommendation 23:

Update figures 10, 11, 13, 15, 16, 19 & 20 to provide consistency and improved depiction of biodiversity and corridor issues as described above and incorporate changes provided in Appendix C.

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Appendix A North West Lake Macquarie Regionally Significant Growth Area



North West Lake Macquarie is a regionally significant gateway and will continue to grow as a housing and employment hub, offering intensive mixed use development; public and active transport; retail; advanced manufacturing and urban services; and office and services employment.

Over the next two decades the existing urban area has potential to grow by 10,000 people, with more than 4,000 new dwellings and the creation of 6,000 jobs. Strategic planning initiatives will support this growth, such as optimising infill development opportunities, enabling flexibility for employment land uses to transition industries into the future, enhancing open space and vibrancy of centres, and investing in critical state and local infrastructure.

A key precinct in the North West Lake Macquarie Regionally Significant Growth Area is the former West Wallsend Colliery located immediately to the west of Cockle Creek and the suburb of Teralba. The area presents a significant brownfield land release and a test bed for innovative re-use of mining lands that supports economic diversification with up to 755Ha of developable land that has the potential to support 20,000 dwellings, tens of thousands of jobs and generate tens of billions of dollars of economic activity.

More detailed planning on North West Lake Macquarie will be included in the review of the Greater Newcastle Metropolitan Plan 2036.

1. Boolaroo-Speers Point Precinct

- Continue to enhance Speers Point Park, Cockle Creek and Cockle Creek foreshore while mitigating flood and lake level rise impacts
- Revitalise Main Road, Boolaroo and Speers Point to reinforce place and support business activation and housing diversity

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- Promote a walkable and cyclable neighbourhood that connects from Munibung Hill, Boolaroo and Speers Point local centres, Speers Point Park and Lake Macquarie foreshore, including pedestrian connection along the Esplanade/Main Road, Park Street and Second Street
- Road, movement and public transport improvements on key State and local roads.

2. Cardiff Advanced Industrial Estate Precinct

- Employment land uses and building provisions are expanded and flexible fostering the transition to an innovative industrial precinct.
- The Munibung Road corridor provides access to national freight networks, public bus services and connects with the principal pedestrian and cycling network
- Explore with TfNSW and Stockland opportunities to upgrade the Glendale interchange, to cater for future land use changes and major transport initiatives, which may include staging of the Pennant Street bridge.
- Amenity and environmental resilience is improving, and land use conflicts resolving between residential and industrial interfaces

3. Cardiff Mixed-Use Precinct

- Promote and create walkable neighbourhoods that connects a diversity of housing, services, jobs and public open space
- Enhance access, connection and visibility of Cardiff Train Station, including commuter car park
- Support improvements and connection for active and other public transport choices
- Intersection improvements and road upgrades occurring on Myall Road, and the Macquarie/Munibung intersection
- Create new public open spaces within the Cardiff strategic centre that facilitates vibrant pedestrian friendly environments and business activation
- Revitalise the Winding Creek Corridor.

4. Cockle Creek Precinct

- Establish an iconic City landmark that will generate excitement, attract visitors, workers and customers from outside of the City
- Provide a diversity of employment opportunities within commercial and employment precincts such as retail tourism, innovative and knowledge-based industries
- Create people-oriented places, that are vibrant, inviting, entertaining, safe, convenient and integrated with efficient active, public transport and transport movement, particularly along TC Frith Avenue, Main Road and Munibung Road
- Expand Cockle Creek train station and explore a multi-modal interchange option to support the precinct's growth
- Enhance open spaces and connect the cultural and recreational potential of Munibung Hill.

5. Cockle Creek West

- The NSW Government and Lake Macquarie City Council will investigate suitable and sustainable reuse of mining land that balances environmental systems while leveraging of existing infrastructure to facilitate a range of employment and urban uses
- Develop plans for transport connectivity and multi-modal opportunities that connect with rail and road from the M1 Motorway to Cockle Creek.

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6. Glendale Retail and Sports Precinct

- Explore with Transport for NSW and Stockland opportunities to upgrade the Lake Macquarie Transport Interchange, to cater for future land use changes and major transport initiatives
- Support the expansion and intensification of the Stockland retail centre with provision of increased street tree coverage
- Support the expansion of the Hunter Sports Centre and Trampoline Centre of Excellence
- Develop plans to support the use and development of vacant surplus lands in ownership of TfNSW for connection with open public spaces and mixed-use development on Main Road
- Improve active transportation connections on Stockland Drive and within the Stockland centre
- Ensure efficient movement of public bus services into the precinct

7. Glendale-Argenton Renewal Precinct

- Facilitate affordable housing choices to capitalise on the proximity to education clusters and Glendale town centre
- Improve amenity of Lake Road and Argenton local centre
- Improve transport networks and services in particular with connecting active transportation networks across Lake Road, Fredrick Street and Main Road
- Facilitate an accessible, mixed-use and educational-innovative hub around Glendale TAFE
- Rejuvenate and connect surrounding public open and recreational space

8. Teralba Precinct

- Support the reinvigoration of the Teralba local centre using heritage as a point of difference
- Protect the heritage values within the Teralba Heritage Conservation Area
- Support improvements to accessibility and multi-modal transport connectivity at Teralba and Booragul Train Stations
- Connect active transportation networks with the wider regional network

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Appendix B

Lake Macquarie City Council's Discussion Paper on Strategic Conservation Planning 2021

Provided separately to the Hunter Central Coast Regional team.

Our reference: D10148737

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Appendix C

Morisset Regionally Significant Growth Area

Mark-ups have been provided separately to the Hunter Central Coast Regional team.

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From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Friday, 4 March 2022 2:03:47 PM

Attachments: staff-submission---draft-hunter-regional-plan-2041---march-2022.pdf

Submitted on Fri, 04/03/2022 - 13:59

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info

Suburb/Town & Postcode

Speers Point

Please provide your view on the project

I am just providing comments

Submission file

staff-submission---draft-hunter-regional-plan-2041---march-2022 pdf

Submission

Please find attached the staff submission to the draft Hunter Regional Plan 2041 from Lake Macquarie City Council.

I agree to the above statement

Yes

From: noreply@feedback.planningportal nsw.gov au

To: DPE PSVC Hunter Mailbox

Subject: Webform submission from: Draft Hunter Regional Plan 2041

Date: Friday, 4 March 2022 2:32:14 PM

Submitted on Fri, 04/03/2022 - 14:31

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name



I would like my submission to remain confidential

No

Info

Email

Suburb/Town & Postcode

2426

Please provide your view on the project

I support it

Submission

From:

Sent: Friday, 28 January 2022 10:11 AM

To: council@midcoast.nsw.gov.au <council@midcoast.nsw.gov.au>

Subject: Rural StrategyPlan

Dear HNTG council,

This is my second edition of my strategy plan for lot 14 Calcal St, Pindimar-sou h.

I purchased my land for camping, I want to keep it for that use, land should remain rural not rezoned E3 which may eliminate camping, and he area is unique because Pindimar Bundabah non urban residents want to continue to camp on heir land because of natural attributes, easy access to water and sandy beach with BBQ area at s h Pindimar, which is very popular for boa ing and locals alike. Or alterna ively I would like the village boundary extended and he area zoned residential which would still allow for camping, but also offer opportuni ies for growth bringing young families to the area and addi ional dollars to MCC.

I believe Councillors should be represen ing their constituents. le Council policy polyandry directions should be directed by community expectations and not by staff who may have other ideas)
This is also in agreement with what Len Roberts said on
21 November 2021 at our regular PBCA meeting. I also had a message from returning officer PBCA who asks us to remember that community issues that directly affect us should not be forgotten ie inadequate pavement on access roads, dangerous sharp curves and lack of street lighting on intersections, sewage issues and continuing fire hazzards/lack of fire break maintenance. MCC is responsible for clearing land they own including all roads as Council has acknowledged ownership of roads.

I already have a portable toilet I bring on every trip, I use the dump point provided by tea gardens at the lookout, my land grasses have been kept low however I have been hesitant to clear trees as concerned I may receive a fine from council. I do not reside at Pindimar (per paper subdivision) I have my own house in Harrington NSW, my partner is a qualified Nurse and myself a 5 star Chef from FNQ Cairns/ Port Douglas and we both would bring employment to the region. Our intentions if (successful on submission) would be to sell up, build a house and live forever, a dream I have had since I

was 6 yo we camped at Jimmys Beach caravan park for 18 years and then my parents bought a set of units in beach st Hawks nest.

Thankyou for allowing me to submit his letter I look forward and respect your decision.

Kind Regards



Sent from my iPad

I agree to the above statement

Yes





4 March 2022

Department of Planning, Industry and Environment PO Box 1226 Newcastle, NSW, 2300

Re: Submission to the Draft Hunter Regional Plan - 2041

Dear Sir/Madam,

The Catholic Diocese of Maitland-Newcastle (CDMN) represents the Catholic Church in the Hunter and Manning Valley Regions. Our geographical area extends from Lake Macquarie to Taree and as far inland as Merriwa and Murrurundi, covering territory of approximately 150,000 Catholics.

We are the second largest private sector employer in the Region, employing more than 3,250 full-time equivalent local staff, who were directly compensated \$295 million in FY2020/21. Over the past five years our capital expenditure budget has risen to record levels, exceeding \$300 million collectively over FY2017 - FY2021.

We provide pastoral, health care, social welfare, mental health, community housing, childcare and educational services for the local communities, both Catholic and Non-Catholic alike. Our core services include:

- 59 Catholic Schools which educate more than 20,000 students in primary and high schools, this includes St Dominic's which educates children with special needs and the St Laurence Flexible Learning Centre in Broadmeadow,
- CatholicCare Hunter-Manning which deliver a wide range of social services including foster care, food programs, counselling, affordable housing and support to refugees and asylum seekers,
- St Nicholas Early Education which supports more than 1,100 families in their childcare needs and a further 5,000+ children in out-of-school-hours care,
- The Rosewood Centre supports people in our community to improve their mental health and wellbeing. The specialist team provide counselling sessions, clinical assessments and behaviour support in eight locations across the Hunter and Mid-Coast Regions, and
- The Catholic Development Fund which facilitates the financial support needed for capital works such as new schools, St Nicholas early education centres and affordable housing, and the support of pastoral programs.

The CDMN is grateful for the opportunity to provide a brief submission to the Draft Hunter Regional Plan - 2041.

Yours sincerely



Diocese of Maitland-Newcastle



Draft Hunter Regional Plan - 2041 CONTRIBUTION









Introduction

The Catholic Diocese of Maitland-Newcastle (CDMN or Diocese) welcomes the Draft Hunter Regional Plans key focus areas of growth, community, resilience and equity.

This resonates well with the Diocese's own goals and mission.

We strongly encourage the adoption of a place-based approach to create sustainable '15-minute regions' supported by local schools, day care centres, health facilities, welfare services, community sports and recreation facilities. The CDMN is a key provider of these services to local communities throughout the Hunter for more than 100 years.

In the following submission, we detail our presence, the impediments to growth, challenges and key recommendations to the Draft Hunter Regional Plan.

Primary and Secondary Education

The Diocese through its Catholic Schools Office (CSO) is the second largest provider of primary and secondary educational services in the Hunter Region, behind only the NSW public school system. The CSO continues to invest heavily in new schools throughout the Region, accounting for the majority of the CDMN's capital expenditure budget. Strong growth is anticipated to continue over the next decade, with a signification pipeline of new opportunities under investigation.

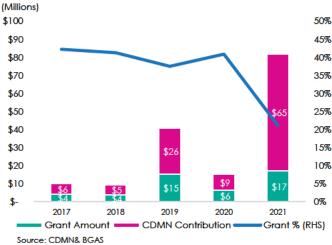
The NSW Government Building Grants Assistance Scheme (BGAS) for Non-Government Schools is the principal avenue of funding for new school builds and upgrades. The CDMN welcomes the recent generalised increase in FY2020/21 funding. However, recent funding for major builds at Medowie, Catherine McAuley Catholic College (Stages 1 & 2) and Chisholm, St Bede's Catholic College (Stages 1 & 2) has fallen substantially.

Historically, we have received around 40% of total new build and upgrade costs from the BGAS.

This has halved to 20% in 2021, which was a record year of capital spend for the CSO.

The CDMN calls upon the State Government to ensure an equitable contribution of funding of non-government schools, particularly in a high-cost escalation environment like the NSW building industry is currently experiencing.

BGAS Grants Vs CDMN Funding



To ensure '15-minute regions' are well serviced, new subdivisions need dedicated land for school developments at favourable rates. The Diocese is often faced with paying residential prices for land within new growth centres. Given the amount of land required to build a K-12 school, this creates a considerable cost barrier and disincentive for the CDMN to invest scarce capital.

Furthermore, continued growth in the school aged demographic across Newcastle and Lake Macquarie Local Government Areas is placing strain on a number of Catholic schools. Councils and the general public need to be more accommodating with traffic management concerns related to the upgrade and expansions of urban Catholic schools in order for enrolment demand to be met.



Early Childhood Education and Care Facilities

The CDMN welcomes the objectives related to childcare centres outlined in the section "Strategy 7.5" of the Hunter Regional Plan. St Nicholas Early Education is the second largest childcare provider in the Hunter Region, with over 1,100 licensed long day care places.

When a child gets off to a good start through early learning and social inclusion it can have a profound impact on a whole range of skills that are important for a child's future. Access to childcare also encourages more women to reenter the workforce and is a big step towards gender equity both in the workforce and society. The burden of childcare is most often borne by women, which has significant adverse consequences on earnings (including superannuation) over the long term.

St Nicholas Early Education continues to expand services in areas of high demand, however, development application approval times for new builds is still of considerable concern.

St Nicholas Early Education currently has five development applications with councils throughout the Hunter, with two that have been with Council for longer than 6 months. Ensuring the objectives stated in the plan related to childcare are met is crucial to the continued rapid growth of the St Nicholas Early Education business.

Growing the Tertiary Education Sector

In line with the Hunter Regional Plans objectives of creating strategic centres that supports employment diversification and creating vibrant local communities, the CDMN believes there is a strong case for the establishment of a new university precinct in the Maitland CBD.

The Maitland Region is the fastest growing statistical area in the Hunter and is a key service centre for the Lower and Upper Hunter Regions.

The Maitland university precinct would further support the ongoing transition away from mining, for which the Region is so dependent, creating 1,000s of new employment and tertiary educational opportunities.

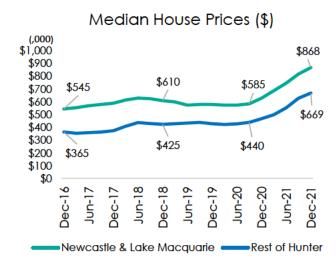
Key offerings could include food and agribusiness (inc. viticulture), tourism, advanced manufacturing, renewable energy, health (with links to the new Maitland hospital) and education.



Boosting Residential Housing Supply

Across the Hunter Region, house prices have increased significantly over the past 18 months, with some suburbs exceeding 50% price growth (CoreLogic). Demand for land continues to outpace supply. The 'Hunter Region Plan' needs to ensure Local and State Government funding and policy meets the requirements of the Region's growing housing demand. This can be done by:

- Ensuring an equitable split of enabling infrastructure works for new subdivisions are shared between developers and Governments,
- An acceleration in the release of land, particularly in the Western-Newcastle growth corridor, Swansea, Medowie, Chisholm, Lochinvar, Gillieston Heights and Cessnock Regions,
- A clear and visible pipeline of future greenfield developments beyond 10 years,
- Further rezoning of residential land along transport corridors to medium and high-density zoning, and
- Ensuring Councils are adequately supported so approvals are efficiently processed and the financial burden is kept to a minimum.



Addressing the Social Housing Deficit

There is widespread acknowledgment of a critical shortage in social housing across the Hunter Region. Over 3,700 general applicants are on the NSW Department of Communities and Justice social housing waiting list across the Region.

There are currently 235 applicants who are considered priority and in desperate need of accommodation. Even more worrisome, the wait period for social housing can often exceeds 10+ years in a number of localities. The clear mismatch in accommodation needs by Region is highlighted in the table below.

Hunter Region Expected Waiting Times for General Applications						
Region	General	Priority	Exp. Wait 1bdr	Exp. Wait 2bdr	Exp. Wait 3bdr	Exp. Wait 4+bdr
Lake Macquarie	544	31	5-10 years	10+ years	5-10 years	5-10 years
Lake Mac. / East	351	20	5-10 years	5-10 years	5-10 years	5-10 years
Maitland	732	32	5-10 years	5-10 years	5-10 years	5-10 years
Merriwa	<5	<5		10+ years	10+ years	
Murrurundi	<5	<5		5-10 years	2-5 years	
Muswellbrook	130	6	2-5 years	2-5 years	2-5 years	5-10 years
Newcastle	1179	98	5-10 years	5-10 years	5-10 years	5-10 years
Port Stephens	151	14	10+ years	10+ years	10+ years	2-5 years
Raymond Terrace	136	9	10+ years	2-5 years	5-10 years	5-10 years
Tea Gardens	12	<5			5-10 years	
Scone	29	<5	2-5 years	2-5 years	0-2 years	2-5 years
Singleton	94	9	2-5 years	2-5 years	5-10 years	5-10 years
Aberdeen	7	<5		2-5 years	2-5 years	0-2 years
Denman	<5	<5	0-2 years	2-5 years	2-5 years	2-5 years
Karuah	<5	<5			5-10 years	10+ years
Dungog	16	<5	5-10 years	5-10 years	10+ years	0-2 years
Cessnock	264	16	5-10 years	5-10 years	5-10 years	5-10 years
Kurri Kurri	102	<5	5-10 years	5-10 years	5-10 years	5-10 years
Total	3747	235				

Rents have also surged in the Hunter Region over the past 12 months, according to CoreLogic. The median weekly rent for Houses leapt 14% to \$508 per week in the 12 months to December 2021. Similarly, rents for Units climbed 9% to \$416 per week over the same period.

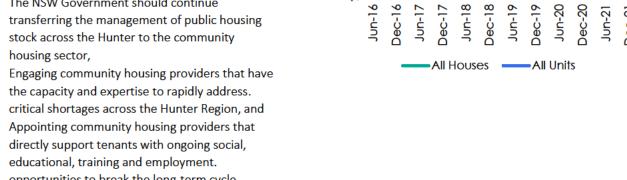
Higher rents, combined with rising fuel and grocery bills, continues to mount considerable pressure on low-income families.



The Hunter Regional Plan needs to address the considerable backlog in demand for social housing across the Hunter Region. This can be done by:

- Undertaking significant expansion of social housing funding programs across the Region to revitalise existing aged-stock and build new fitfor-purpose housing,
- Developing stronger partnerships between Federal and State Governments and the community housing sector,
- The NSW Government should continue stock across the Hunter to the community
- the capacity and expertise to rapidly address.
- directly support tenants with ongoing social, educational, training and employment. opportunities to break the long-term cycle of demand.

Hunter Region Weekly Rents (\$) \$600 \$508 \$500 \$420 \$402 \$400 \$400 \$416 \$300 \$361 \$350 \$322 \$318 \$200 \$100 \$0





Roads, Railways & Ports

The CDMN continues to welcome and support Federal, State and Local Government funding for public infrastructure works that deliver positive economic and social benefits. As the Region grows the CMDN calls on all levels of NSW Government to support growth through the coordinated delivery of the necessary infrastructure needed to support an interconnected and prosperous Hunter Region.

Roads

The CDMN believes more funding needs to be provided to the Hunter to ensure the Hunter Regional Plan goals of creating 15-minute neighbourhoods and 30-minute strategic centres is achieved.

The current Housing Acceleration Fund, which is designed to support the delivery of new homes and jobs, continues to overlook the Hunter Region and needs to be reviewed.

Figures for NSW show that less than 5% of the approximately \$1 billion fund has been invested across the Hunter Region, despite the Region accounting for more than 10% of the State's population.

Allocating a fixed percentage of the fund to the Hunter Region and creating priority programme of works is needed to support housing growth. Key projects should include:

- Lake Macquarie Transport Interchange (Glendale).
- · Link Road Interchanges (Cameron Park),
- Road pinch points at Warners Bay, Charlestown, Kotara, Adamstown, Merewether Heights & Hamilton,
- North West Lake Macquarie Road pinch points and access upgrades (inc. pedestrian bridges to new subdivisions), and
- New roads and pinch points at Chisholm,
 Thornton, Medowie, Cliftleigh, Heddon Greta,
 Gillieston Heights and Lochinvar.

Councils and State Governments also need to work closely to ensure the cost of delivering public infrastructure does not fall on the shoulders of the private sector. Recently, the CSO was required to 'foot the bill' for a set of new pedestrian traffic lights, at the Catherine McAuley College,

Medowie, costing \$4.9 million. The CDMN views this is a clear market failure, detracting capital funding away from the school to fund a State infrastructure project.

Additionally, the Diocese views the proposed Hunter Region Special Infrastructure Contribution rates as excessive. In particular, the rate applied to industrial land per hectare acts as a tax on growth, adding additional costs to new employment growth centres and deterring investment in the Hunter Region.

Railways

Increasing funding to improve the Hunters rail network is called on by the CDMN to unlock growth, provide better experience for public transport and provide integrated transport solutions for the Hunters growing population. The current NSW Transport Access Program (TAP) has overlooked the Hunter in recent years and additional funding is required to service high growth areas between Newcastle and Singleton.

Much of the regions new housing estates are located along this corridor and improving access, including new car parks, disability access and local roads is critical. New train stations should also be considered to support growth and reducing car dependency as part of the Hunter Regional Plan.

Ports

The CDMN views the terms associated with the long-term lease of the Port of Newcastle and the development of a new container terminal anticompetitive and a significant detriment to the people of the Hunter.

A modern and highly efficient container terminal, supported by essential infrastructure, reduces the dependency of the Hunter Region on the Port of Botany and would save primary producers time, money and reduce emission. A new container port would also create billions of dollars of new investment and enduring jobs for Newcastle and the broader Hunter Region.



Mental Health and Social Services Support

Throughout Newcastle, Lake Macquarie, Maitland, the Upper Hunter and Manning, CatholicCare offers support, assistance and education to all families and individuals, regardless of age, gender or religion.

Core to the delivery of social services in the Region is the eight CatholicCare Centres, two Rosewood Centres and a Refugee Hub we operate.

CatholicCare provides foster care, child, youth and family programs as well as community kitchens in Forster, Taree, Newcastle and Maitland areas.

Our two Rosewood Centres support 1000's of people in the broader community by improving their mental health and wellbeing. The dedicated team of experienced psychologists and clinicians are passionate about helping people to live well and work towards their goals and support the Regions lower socioeconomic demographic by providing affordable and high-quality services.

At the Refugee Hub, we support people from refugee, asylum-seeker, and vulnerable migrant backgrounds, often from conflict zones such as Sudan, Sierra Leone and Afghanistan, to settle into life in Australia, apply transferrable skills and integrate into their new community.

The CDMN continues to stress the importance of community based social services that are developed in partnerships with Government's, providers and local communities.

The Diocese encourages:

- Boosting funding for social services across the Hunter Region,
- The expansion of mental health services in the Hunter Region,
- The use of schools as a mechanism to drive the prevention of mental health disorders in the Region from a young age.

Transition to Net Zero

His Holiness Pope Francis's landmark *Laudato Si'* Action Platform takes its name from the 2015 encyclical on the need to protect the environment, reduce wasteful lifestyles, stem global warming and protect the poor from the effects of climate change.

The Diocese, in accordance with the *Laudato Si'* Action Platform, supports the transition away from coal in the Hunter Region and towards Net Zero as a Nation.

We applaud the Government's commitment to the Hunter Renewable Energy Zone, noting an ideal balance between wind, solar and battery technologies needs to be implemented, to ensure the intermittent nature of renewable energy is mitigated when replacing baseload coal fired generators.

We also recognise the direct impact on employment in the Upper and Lower Hunter mining communities as well as the impact on lower socioeconomic groups more broadly.

A 'Royalties for the Region' style fund could be established, allocating a fixed annual percentage of funds received from coal royalties, to assist the transition over the long-term and bring the socio-economic levels of the Hunter Region up to par with the Sydney metropolitan area.





Conclusion

The CDMN would like to thank the Department of Planning, Industry and Environment for opportunity to contribute to the Draft Hunter Regional Plan and would equally welcome any further engagement throughout the process.



From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Friday, 4 March 2022 3:07:03 PM

Attachments: catholic-diocese-of-maitland-newcastle-draft-hunter-regional-plan-submission pdf

Submitted on Fri, 04/03/2022 - 15:01

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info

Email

Suburb/Town & Postcode

Newcastle West 2302

Please provide your view on the project

I support it

Submission file

 $\underline{\text{ca holic-diocese-of-maitland-new}} \\ \underline{\text{ca holic-diocese-of-maitland-new}} \\ \underline{\text{catholic-diocese-of-maitland-new}} \\ \underline{\text{catholic-diocese-of-maitland-ne$

Submission

Please find attached our submission to the Draft Hunter Regional Plan - 2041

I agree to the above statement

Yes





17 February 2022

Department of Planning and Environment PO Box 1226 Newcastle NSW 2300

Dear Sir/Madam,

Biraban Local Aboriginal Land Council and Landcom - Joint submission to the draft Hunter Regional Plan 2041

Landcom is the NSW Government's land and property development organisation. We are a State-Owned Corporation working with government and the private and not-for-profit sectors to deliver exemplary housing projects that provide social and economic benefits to the people of NSW.

Landcom is working in partnership with the Biraban Local Aboriginal Land Council (LALC) to investigate the development potential of the LALC's land holdings in the Lake Macquarie area. The draft Hunter Regional Plan 2041 provides a key strategic document to both the LALC and broader community in the Region.

Landcom and the Biraban LALC thank the Department for the opportunity to provide some comments and observations on this draft Plan. This submission references the draft Plan's page numbers, includes excerpts from the plan and then the organisations comments.

Summary Points

- We commend Department of Planning and Environment for identifying the Aboriginal Land Rights Act, 1983 with the Local Government Act 1993 as influences into regional planning.
- We are pleased to see the Urban Development Program extended to incorporate the land holdings of Local Aboriginal Land Councils; however, we would like to see LALCs included on these committees as Darkinjung LALC has been included on the Central Coast Committee.
- Biraban LALC is currently drafting its Development Delivery Plan (DDP) which sets out short, medium and long-term development aspirations within the State Environmental Planning Policy (Aboriginal Land) 2019. We encourage the Department to review Biraban's draft DDP Attachment 1, and to consider classifying these land holdings, where appropriate, as residential or employment precincts subject to investigation.

This would align with the Department's Objective 2 'Ensure economic self-determination for Aboriginal communities.' If LALC's land isn't or cannot be developed, then the Aboriginal communities cannot utilise it to achieve economic self-determination. We would welcome the opportunity to brief the Department on Biraban's draft DDP with the aspiration that those relevant sites be included in the Hunter Regional Plan 2041.

- Prior to finalising the regional biodiversity corridors, it is encouraged that the Department consider the land interests of the LALC's, including that Crown land which is subject to Aboriginal Land Claim but yet, undetermined.
- Landcom and BLALC are concerned that the large urban investigation area south of Morisset Train Station has not been allocated a Precinct number yet could assist in the growth of the Morisset as a regionally significant mixed-use city. **Attachment 2** illustrates the extent of land that Biraban LALC currently owns within the Morisset area.

Commentary on the draft Plan



Page	Relevant content from Draft HRP2041	Landcom/Biraban comments
9	This draft regional plan has been prepared concurrently with Transport for NSW's draft Hunter Regional Transport Plan	We have not been able to obtain a copy the draft Transport Plan
	Local Government Act 1993 State Environmental Planning and Assessment Act 1979 State Environmental Planning Policies Regional Plan Community Strategic Planning Development Delivery Plan Place Strategy Planning Proposal Aboriginal Land Rights Act 1983 Community Land and Business Plan Place Strategy	DPE is to be commended for identifying the ALRA 1983 along with the LGA 1993 as influences into regional planning.
12	_ •	

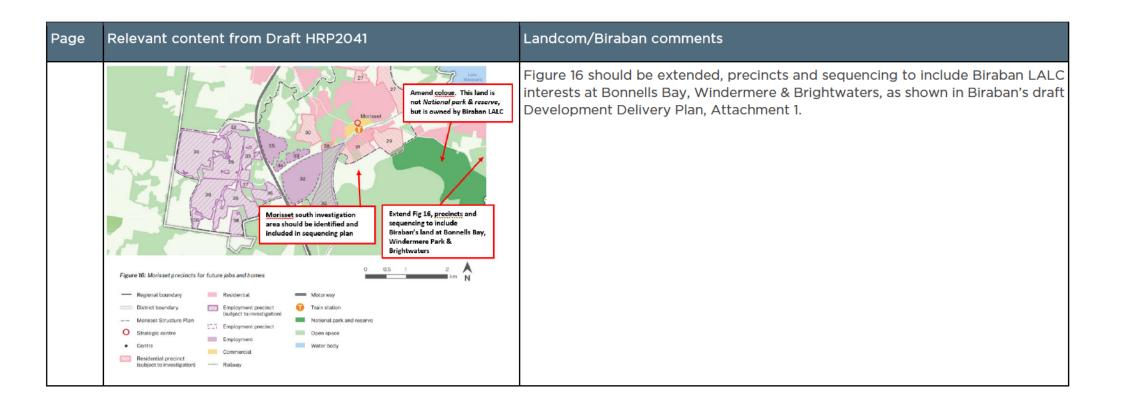
Page	Relevant content from Draft HRP2041	Landcom/Biraban comments
		This aligns with Objective 2 of the Draft (Ensure economic self-determination for Aboriginal communities).
16	An infrastructure-first and place-based approach At present, strategic land use decisions, including those relating to state infrastructure contributions, often precede capital investment planning Consequently, decisions on infrastructure investment often lag behind the identification and development of new growth areas and increased housing in existing places.	We acknowledge the Department's recognition that decisions on infrastructure investment have often 'lagged behind' new growth areas. We would like to be a part of further discussions that will lead to the delivery of catalytic, enabling and supporting infrastructure.
17	demand will enable better decisions on urban renewal priorities, release of land for development and the infrastructure and servicing required to enable delivery The urban development program will also be extended to incorporate the landholdings of Local Aboriginal Land	However, we do note that the draft Plan defines a Hunter UDP Committee <u>BUT</u> does not include Local Aboriginal Land Councils. By contrast, the Draft Central
18	Infrastructure first and place-based framework The department will establish planning pathways to	Biraban LALC is currently drafting Development Delivery Plans for their land holdings. These set out short, medium & long term development aspirations and relate to the SEPP (Aboriginal Land) 2019, Attachment 1.

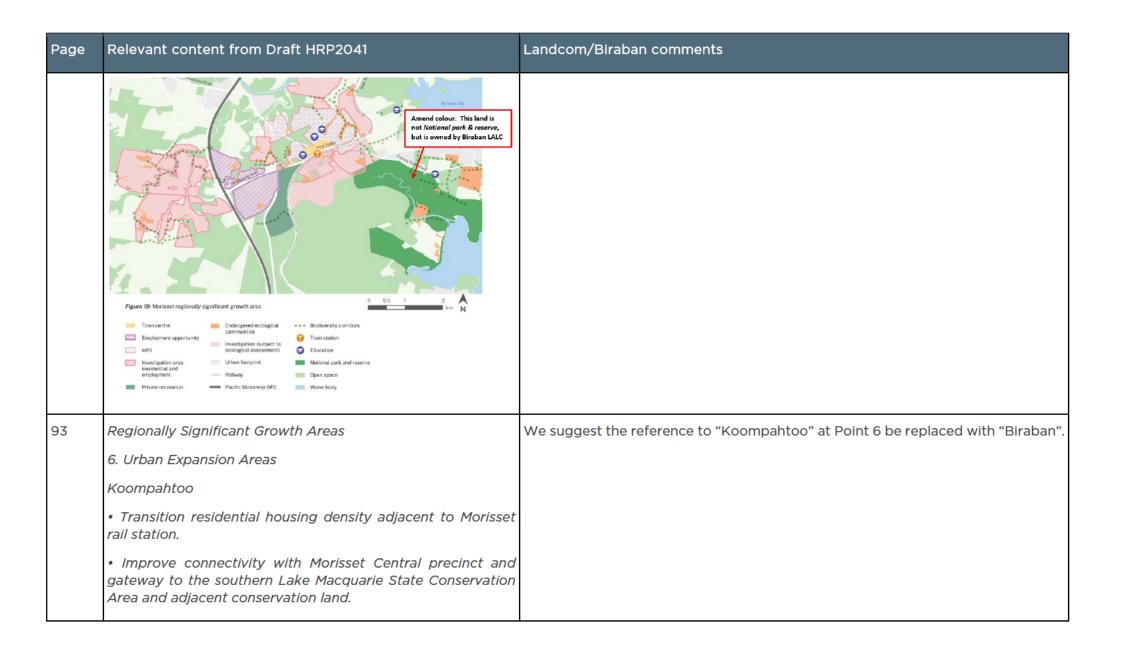
Page	Relevant content from Draft HRP2041	Landcom/Biraban comments	
	align land use and infrastructure planning and provision. 1 — Planning for growth areas in the right places 2 — Analyse infrastructure servicing need 3 — Establish sequence for prioritisation 4 — Develop place strategies 5 — Streamline planning pathway 6 — Provide great places and outcomes Local Aboriginal Land Councils also have a program for short, medium and long-term development and conservation aspirations.		
19			

Page	Relevant conte	nt from Draft I	HRP2041		Landcom/Biraban comments	
20	Purpose	Urban activation and Region shaping Unique industry employment industry precincts opportunities			We are encouraged to see Morisset listed as a Significant Growth Area, as we have commenced investigations into areas of the Morisset surrounds, either already zoned, or identified for future urban release. This includes a significant holding just	
		Focus investment to enable vibrant place outcomes and local jobs	Coordinated industry growth and secure freight capacity	Promote growth leveraging its unique characteristics	south of the Morisset Train station.	
	Hunter Regional Plan Regionally Significant Growth Areas	Broadmeadow Morisset Taree Forster-Tuncurry	Hunter Expressway National Pinch Point (including Beresfield Black Hill)	Hunter Valley Viticulture Precincts Liddell and Bayswater Power Stations Scone Equine Precinct		
	Greater Newcastle Metropolitan Catalyst Areas	North-West Lake Macquarie Newcastle City Centre Kotara	Williamtown Newcastle Port Tomago	John Hunter Hospital and Innovation Precinct Callaghan East Maitland		
	Place strategies will be overseen by a place delivery group chaired by the department, and including relevant public authorities, infrastructure providers, LALCs and councils to address agency referral and place-making matters			relevant public and councils to	•	
27	Objective 2: Ensure economic self-determination for Aboriginal communities				We welcome the recognition and opportunity for improving economic self-determination in Aboriginal communities.	
	The department will continue to strive to remove or reduce the numerous challenges in accessing the opportunities generated from land rights					
	Development delivery plans for a priority LALC land to be considered during the assessment of planning proposals and development applications.					
28	1				Strategy 2.1. 'facilitating the prompt, efficient and equitable return of land to Aboriginal communities' acknowledges the need to better understand the extent of land interests by LALC's across the Lower Hunter (and State) by way of	

Page	Relevant content from Draft HRP2041	Landcom/Biraban comments
	The NSW Government will work with Aboriginal communities to better align strategic planning and Aboriginal community aspirations. In practice, LALC lands will be considered across the hierarchy of strategic plans and environmental matters identified and resolved early in strategic planning	Agrees the State there are approximately 75,000 uprecelyed land claims with
	statements can be aligned to provide a framework to achieving self-determination by: • facilitating the prompt, efficient and equitable return of land to Aboriginal communities;	Unresolved Land claims lead to incomplete planning decisions and delays. The Department is encouraged to continue working with other Agencies including Crown Land, exploring mechanisms which might lead to early resolution of Land Claims, leading to reduced delays and increased certainty to the planning system. We understand that it is beyond the scope of this document to suggest necessary amendments to the Biodiversity Conservation Act 2016 (BCA) to provide greater flexibility to Aboriginal organisations, but this is considered a necessary and fundamental measure to ensure better alignment and consistency of the BCA with the Aboriginal Lands Framework.
	improving the identification and conservation of environmental and Aboriginal cultural heritage values;	Reforms to the BCA will improve the economic self-determination of Aboriginal communities in New South Wales.
37	Strategies and actions to how we will accomplish it Optimum density Strategy 4.1 This optimum urban density will vary by context and planned intention of different places in the Hunter and will be determined by neighbourhood and site-based analysis in development proposals. But, at a minimum development proposals will reflect an urban density of 50-75 dwellings per hectare of developable land, which is a density range considered to be the minimum necessary for there to be reasonable public transport and to support a local mix of land uses	opportunity to review these density bands with the Department to align housing typologies, with feasibility and intended outcomes.

Page	Relevant content from Draft HRP2041	Landcom/Biraban comments
47	Action 2 The Department of Planning, Industry and Environment will continue to progress the Central Coast strategic conservation planning program and consider opportunities to undertake further strategic conservation planning in Morisset. Timeframe: 2022/23	Landcom and BLALC welcome the opportunity to participate in discussions that lead to the Strategic Biocertification of lands within the upcoming Greater Morisset Structure Plan, currently being prepared by Lake Macquarie City Council.
69	North West Lake Macquarie More detailed planning on North West Lake Macquarie will be included in the review of the Greater Newcastle Metropolitan Plan 2036.	Biraban has significant land interests in the Rathmines area, which are illustrated in Biraban's draft Development Delivery Plan, see Attachment 1. We look forward to continued dialogue with the Department in its review of the Greater Newcastle Metropolitan Plan 2036.
83	Central Lakes An inter-regional and coordinated approach across the Central Coast and Hunter is required to balance environmental outcomes and well-planned communities as the district grows Growth around Morisset will be managed to ensure it emerges as a regionally significant mixed-use city There is opportunity to create a green break around Morisset and Cooranbong. Similarly, a regional biodiversity corridor has been identified linking the coast at Lake Munmorah to the mountains via a corridor between Morisset and Wyee.	
87	Refer images below	Landcom is concerned that the large urban investigation area south of Morisset Train Station is not allocated a Precinct number, or shown on Figure 16









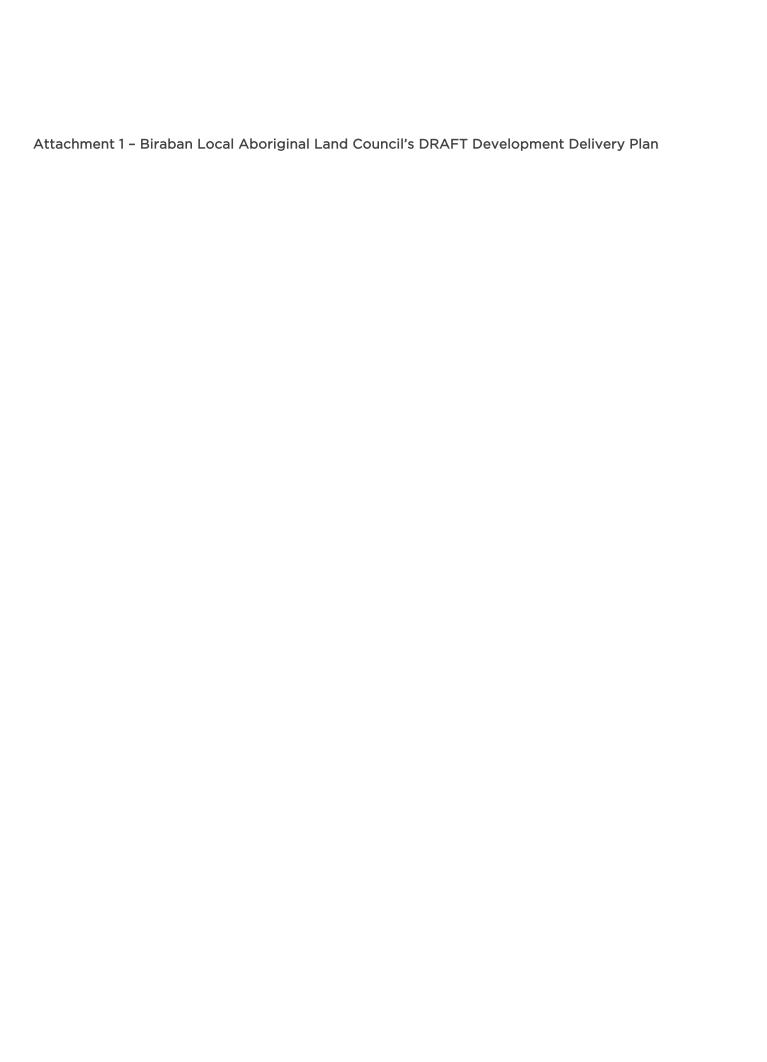
Again, Landcom and Biraban Local Aboriginal Land Council thank the Department for the opportunity to comment on the draft Plan.

We would welcome the opportunity to discuss any of these comments in this submission with the Department.

Yours sincerely,

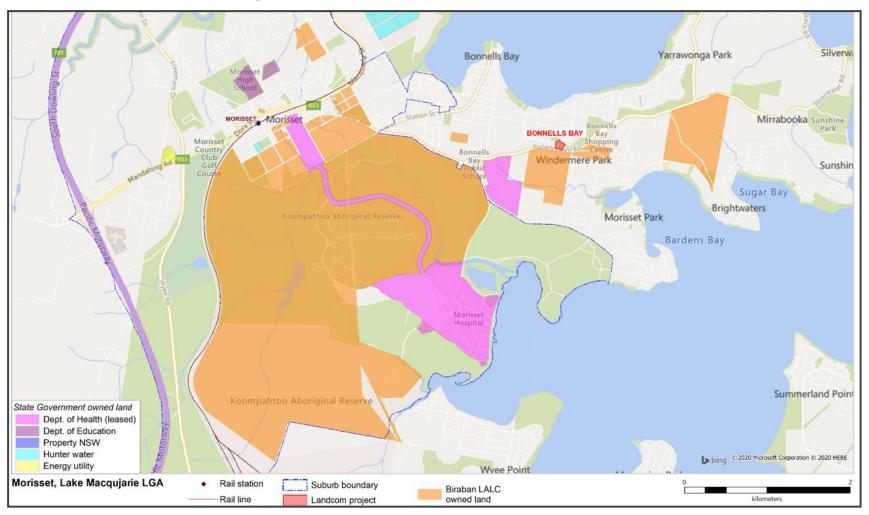


Attachment 1 - Biraban Local Aboriginal Land Council's DRAFT Development Delivery Plan Attachment 2 - Biraban Local Aboriginal Land Council owned land in the Morisset area.





Attachment 2 - Biraban Local Aboriginal Land Council owned land in the Morisset area.



From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Friday, 4 March 2022 3:17:03 PM

Attachments: 220217 hunter-regional-plan biraban-landcom-submission-signed.pdf

Submitted on Fri, 04/03/2022 - 15:14

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info

Email

Suburb/Town & Postcode

Boolaroo 2284

Please provide your view on the project

I am just providing comments

Submission file

220217 hunter-regional-plan biraban-landcom-submission-signed.pdf

Submission

To whom it may concern,

Please find attached a joint submission from the Biraban Local Aboriginal Land Council and Landcom.

Regards,



I agree to the above statement

Yes

From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Friday, 4 March 2022 3:49:24 PM

Submitted on Fri, 04/03/2022 - 15:49

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name





I would like my submission to remain confidential

Info

Email

Suburb/Town & Postcode

6560

Submission

Hi i own land in NAC which is suitable for development due to location (road access) need to expand services to young and old i support sub stainable living culture and environment it would be perfect for the new way of living look at our proposals and make history to benefit all thank you

I agree to the above statement

Yes

Contact Name: Mathew Pringle Contact No: 0265401100 Our Reference: OUT-1169/22



3 March 2022

Department of Planning, Industry & Environment PO Box 1226
NEWCASTLE NSW 2300

Dear Sir/Madam,

Draft Hunter Regional Plan 2041

Thank you for the opportunity to provide a submission on the Draft Hunter Regional Plan 2041.

We provide the following comments on various parts of the draft plan for your consideration.

Strategic Vision, Policy Positions and Objectives

Council generally supports the draft plan's strategic vision for the region and welcomes the inclusion of many of the strategic policy positions and objectives of the plan including:

- A focus on green infrastructure and the natural environment including planning for more trees in urban areas and promoting regional habitat connectivity.
- Responding to climate change and making climate change a guiding principle for all planning decisions.
- Diversification of the Hunter's mining, energy and industrial capacity and promoting a more sustainable circular economy
- A commitment to improving the economic self-determination of Aboriginal communities.

Hunter Urban Development Program Committee

While improved coordination toward urban development based on a strong evidence base is supported, the proposed structure of the Committee and its focus has the potential to mean smaller regional and rural Councils characterised by lower urban growth rates (i.e. those not included in the current Greater Newcastle Metropolitan Plan (GNMP) area) will be considered a lower priority for the Committee, reducing the ability of these Councils to provide development that is needed by their local communities. As such, it is recommended that a Lower Hunter Urban Development Program Committee and a separate Upper Hunter Urban Development Program Committee be established to address the significant differences in urban growth rates and environmental planning issues between the two sub-regions.



General Manager | Upper Hunter Shire Council | PO Box 208, Scone NSW 2337

Phone: Scone Office 6540 1100 | Merriwa Office 6521 7000 | Murrurundi Office 6540 1350

Email: council@upperhunter.nsw.gov.au



Diversify the Hunter's mining, energy and industrial capacity

The draft plan does not give adequate recognition to the importance of the growing renewable energy industry, which is clearly demonstrated by the number of State Significant Development approvals and proposals for wind farms and solar farms across the Hunter region. The renewable energy sector will help to diversify the economy and provide much needed jobs in the future as we transition away from coal to a net zero emissions region. The Energy Corporation of NSW (EnergyCo) is currently considering the establishment of a Hunter-Central Coast Renewable Energy Zone to facilitate and encourage multi-billion dollar investment in renewable energy projects in the Hunter. The draft plan should include strategies to help foster this investment.

Creation of a 15-minute Region

Some aspects of the draft plan are very metropolitan focused with a number of planning principles and concepts that are not suited to the rural parts of the Hunter region. For example, the 15-minute region concept is not a practicable model for the rural parts of the Upper Hunter (outside the main towns) due to the remoteness of some communities. A number of villages and localities including Moonan, Timor, Ellerston and Cassilis are from 30 minutes to 1 hour from a town offering employment, commercial, community, recreation and education services. The lack of public transport in these areas and the limited range of services available in our communities means that the reliance of motor vehicles will continue.

In order to improve connectivity across the region, increased government investment is needed in road and rail infrastructure, public transport, telecommunications and public health and education.

Housing Diversity and Optimum Density

Planning for housing diversity, including more affordable housing is supported. However, the application of an 'optimum density' across the entire Hunter region may be problematic due to the diversity and rural character of our towns. The optimum density in suburban Newcastle would not be appropriate in towns like Merriwa or Murrurundi, which are characterised by much lower densities. Lower densities is what differentiates these communities from larger urban centres and contributes to the unique character of rural towns which is one of the major drawcards for 'tree-changers'. Not everybody wants to live on a 200m² block in a medium or high density residential environment.

Centres and Main Streets

The strategies to promote and enhance the vitality and viability of the Hunter's towns and main streets support Council's plans to revitalise its town centres and invest in community projects such as a new public library, public open space and amenities in Scone. Other Council initiatives including subsidies for shop-front refurbishment and waiving Council fees for outdoor dining and footpath trading are consistent with the strategies to promote town centres (Objective 7). Council agrees that a range of strategies are needed to ensure the sustainability of our towns including investment in town centres; encouraging medium density housing in residential areas around centres; focusing commercial and retail activity in existing commercial centres; supporting business diversity and flexibility and removing barriers to place-making.

District Planning and Growth Areas

• It is noted that the Scone Equine Precinct has been identified as a regionally significant growth area as it provides a unique industry opportunity. Whilst Council supports the growth of the industry and the development of a place strategy, it is unclear who would fund the place strategy, technical studies and operation of the Place Delivery Group.

- In relation to the Upper Hunter section of Part 3 of the draft plan District Planning and Growth Areas (page 109), it is recommended that the examples of the main forms of tourism be expanded to include all of the major community events and festivals across the Upper Hunter including the Scone Horse Festival, Warbirds over Scone, Festival of the Fleeces, Highland Games and King of the Ranges as well as a reference to the numerous horse related shows and events.
- The proposed 'Upper Hunter Rail Trail' between Merriwa and Denman referenced on page 110 is unlikely to proceed and therefore should be removed from the plan.
- It is unclear why, on page 110, it is stated that 'greater connections from tourist gateways from Denman to the viticulture areas will also enhance visitor experiences' when Denman is located outside the Upper Hunter district and there are no viticulture areas within the Upper Hunter district.

Repealed Plans and Strategies

Council supports the repeal of the Upper Hunter Strategic Regional Land Use Plan 2012 which is very much focused on ensuring the sustainability of the coal mining industry in the Upper Hunter. It is clear in the draft plan that coal has a finite lifespan as an energy source and we must now consider how we manage the transition from coal to renewable energy sources.

Please do not hesitate to contact Mathew Pringle, Director Environmental & Community Services, should you have any questions regarding the content of this submission.



From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Friday, 4 March 2022 4:10:42 PM

Attachments: submission---draft-hunter-regional-plan-2041---rev-a.pdf

Submitted on Fri, 04/03/2022 - 16:08

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info

Suburb/Town & Postcode

Please provide your view on the project

I am just providing comments

Submission file

submission---draft-hunter-regional-plan-2041---rev-a.pdf

Submission

See attached submission.

I agree to the above statement

Yes

Innovative Ideas for the Communities of the Future

The North Arm Cove Initiative

#northarmcoveinitiative #northarmcove

DESIM

Design
Engineering
Sustainability
Innovation

Management

Our Path - Change

"You never change things by fighting the existing reality.

To change something, build a new model that makes the existing model obsolete."



Buckminster Fuller



Our Inspiration

Griffins Walter Burley and
Marion Mahony
Environmentalists,
Architects, Planners,
Innovators,
Community Builders

"I am what may be termed a naturalist in architecture. I do not believe in any school of architecture. I believe in architecture that is the logical outgrowth of the environment in which the building in mind is to be located"

Walter Burley Griffin
New York Times,
Sunday June 2, 1912.



Design Engineering Sustainability Innovation Management







Hundred years ago, they created plans for

The Port Stephens City





#NorthArmCoveInitiative

Lost City of Port Stephens North Arm Cove, Mid-Coast LGA, Hunter Region



Unique Australian Cultural Heritage:

"As the world grapples today with the problems of climate change, unsustainable urban growth, social alienation and the despoilment of nature, the Griffins' visionary convictions and their expression through the legacy of the Griffin heritage, are of even greater consequence than in their own time" (Watson, 2015: 18).

Peter Harrison, Australian town planner and a champion of the Griffin Plan for Canberra, described the Griffin's plans for Port Stephens City as:

'one of his most elegant essays in site planning' (Harrison 1995:58).









Mid-Coast LGA has some problems

Economic

According to its own LSPS, Midcoast Council has serious issues:

- 'high levels of retirement and unemployment, and
- low levels of education attainment.
- the household incomes in the MidCoast are significantly lower than other regions' and being '25th most disadvantaged Council area in NSW (out of 131 areas) with a SEIFA index of 928'.



Bushfires, November 2019



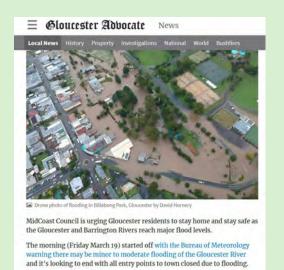
Social

- The statistical area of Tea Gardens has the highest average age of its population among all areas in the country
- skills shortage
- low income levels

Environmental

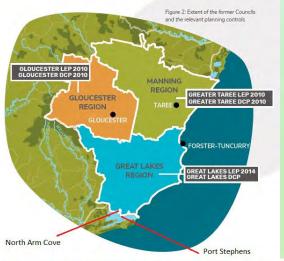
Only in past two years area has suffered from

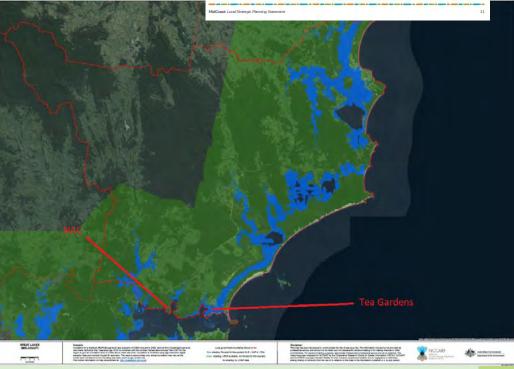
- Catastrophic bush fires
- And flooding
- Damaging coastal erosion
- Endangered biodiversity



North Arm Cove

Last year Mid-Coast Council could not afford a defibrillator for its own Community Centre in NAC (population average age 65, nearest medical centre half an hour away), so residents had to buy their own form donations.





Expected rise in sea levels will further jeopardise many low laying areas.

Mid-Coast LGA proposed urban growth areas

Urban_Release_Areas_Report_July_2021

Proposed growth in population of MCC is about 300/year over next 25 years.

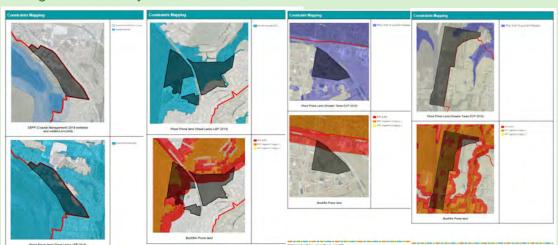
Urban release areas selected for growth all have serious constraints that will create further problems for LGA and NSW

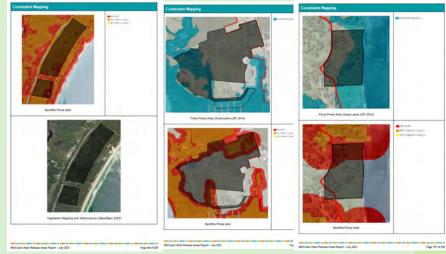
NSW is experiencing extreme weather and it is likely that patterns will continue..

Investment in areas that are likely going to be exposed to flooding, fires or inundations due to sea level rises is irrational. Investment in areas with environmental sensitivities would further endanger biodiversity.



Forster Area





Hawks Nest / Tea Gardens Area

Design
Engineering
Sustainability
Innovation
Management

Various Growth Areas

'Face reality': Don't build in flood prone areas, resilience boss says

By Michael Koziol, Nick O'Malley, Lucy Cormack and Charlotte



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Proposed Kings Hill development

Proposed development at North of Raymond Terrace for 10,000 people is of similar size as North Arm Cove, confirming that there is demand for housing in this area.

However, development of this size in this location could have negative impact on water catchment, being located between Williams River and Grahamstown Dam.

In addition, location is under a flight path of nearby Newcastle Airport / Williamtown RAAF base





Sustainability Innovation Management

Kings Hill – Water Catchment

PORT STEPHENS

CURRENT CIVIL OPERATIONS

BASED ON DATA FROM 1-7 JULY 2019

Williamtown/Newcastle Airport is situated within the Port Stephens Local Government Area, so most communities within this Local Government Area experience civilian aircraft operations to some degree.

Operations so close to an airport are typically below 3,000 feet.

When Runway 12 is in use (which is most of the time):

- the communities of Brandy Hill, Butterwick, Duns Creek, Glen Oak, Nelsons Plains, Raymond Terrace and Wallalong experience concentrated arrival operations due to the location of the RNAV and ILS instrument approach flight paths, which are dictated by the runway orientation
- the communities of Fern Bay, Fullerton Cove, Oyster Cove, Salt Ash, Swan Bay and Williamtown experience concentrated departure operations.

When Runway 30 is in use:

airservices

- the community of Williamtown experiences a concentration of arrival operations
- the communities of Balickera, Eagleton, East Seaham, Fern Bay, Tomago, Williamtown experience a concentration of departure operations.



Source: Airservices Operational Data Analysis Suite; Includes civil aircraft movements only

Raymond
Belia
Restaurant Me

Old Farm Nursery

Webster's Coachworks

Pacific Dur

Belia
Restaurant Me

Mcdonald

Rehardson 8id — Campvale

RAF Base W

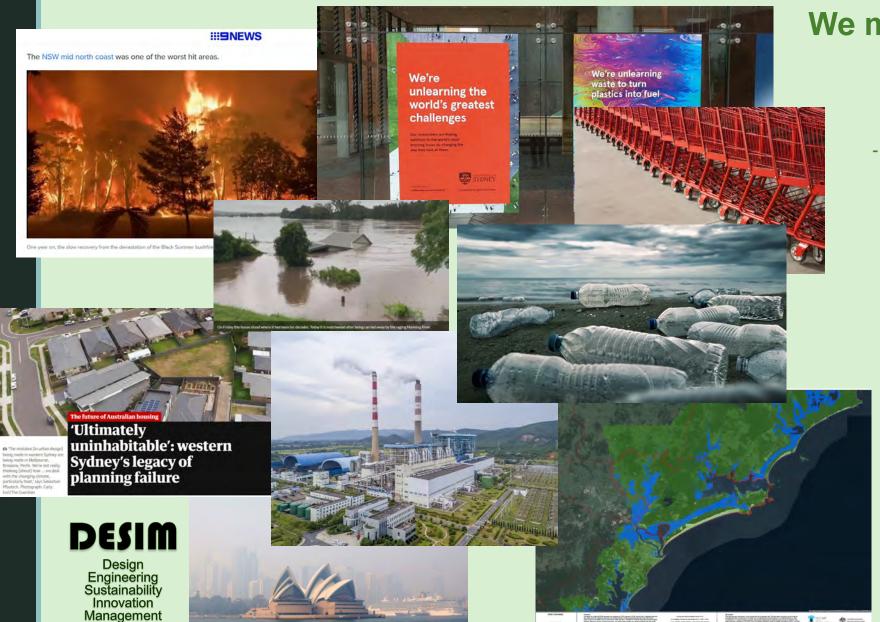
Newwastic
Airporti.

Fighter W

Newcastle Airport flight paths

Kings Hill - General Location

Our Path - Unlearning Past Mistakes



We must change our ways

- Consumerism
- Overuse of Natural Capital
 Overuse of Energy
 - Overuse of Food
 - Overdevelopment
 - Overuse of Medication
 - Health Crisis
 - Pollution
 - Air
 - Water
 - Land
 - Food
 - Changing Climate
 - Bushfires
 - Floods
 - Coastal Erosion
 - Inundation
 - Ocean warming

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Our Path - Unlearning Past Mistakes

"You never change things by fighting the existing reality.
To change something, build a new model that makes the existing model obsolete."

Buckminster Fuller



Our Path - Collaborative Planning



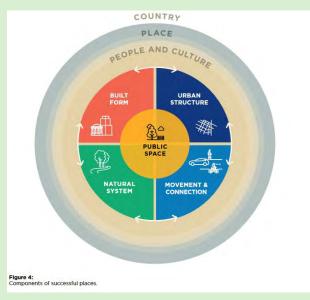
NSW Circular Economy Policy

"You never change things by fighting the existing reality.
To change something, build a new model that makes the existing model obsolete."

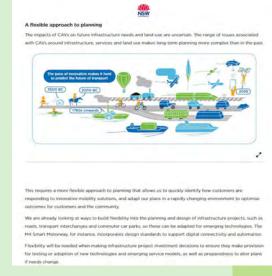
— Buckminster Fuller



NSW Smart Places Strategy



Design & Places SEPP



NSW Future Transport - 2056

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Our Path - Collaborative Planning

Connecting:

standards

· Market demand

- Communities
 - Research
 - Industries
- Government

We have methods and technologies **Green Zoning** Accelerating Smart Growth

ELLEN MACARTHUR

Efficient use our resources:

- **Materials**
 - Space
 - Energy
 - Time
- Information

Circular Economy

- Design out waste
- Extended use of products
- Regenerate natural systems

Innovative ways of using

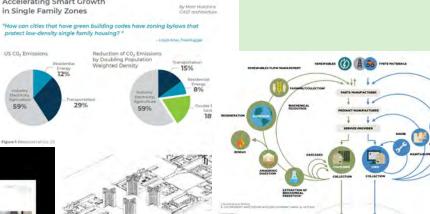
technology

- **Digital Communication**

 - Blockchain
 - Biophilic Design

Creating resilience through:

- Local food generation
- Local power generation
- Local water harvesting and storage
 - Local community engagement
 - **Beyond Net-Zero**



Changing climate and energy efficiency BENEFITS OF A PASSIVE HOUSE Opportunities for Passive House: · Change in regulations and GUIETER INTERIOR ENVIRONMENT · National Construction Code · Education of end users SAVE 70-80% OF HEATING AND

points of future-proof

A2M Architects - Belgium Futureproof Design

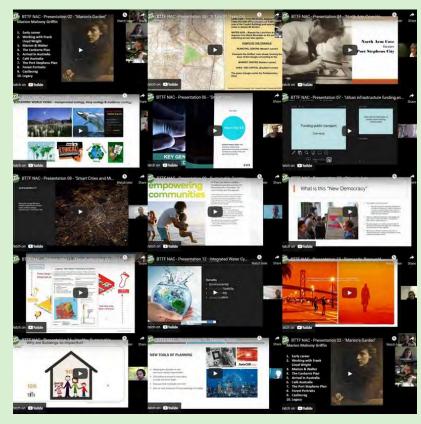
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Our Path - Education

"Back to the future – North Arm Cove" Student competition 2020-21



Design Engineering Sustainability Innovation

Management

www.backtothefuture-nac.com 14 lectures

YouTube DESIM channel

Future created by and for new generation

















earning from the Past

- Successes
- Mistakes
- Locations
 - People

Planning

- Identification
 - **Analysis**

Constraints and Opportunities

- **Design Solution Options**
 - **Implementation**
 - Governance

Circular Economy

- Circular Design
 - **Digital Twins**
- Regenerate natural systems

Measurable outcomes

- **Economic**
 - Social
- Environmental
- **Innovation** #NorthArmCoveInitiative









Our Path - Education

"Back to the future - North Arm Cove" **Student competition 2020-21** Winning Team – "Back on Track"



Winning Team: Sofya Savenkova lina Lohi Noah Watson

Future created by and for new generation

FROM JURY JUDGEMENT

"A well-researched and considered proposal." "General urban design principles are sound and capture original Walter Burley Griffin concept with innovative planning ideas like 'play streets', activation plans, scaled betterment funding, and community hub/satellite planning. The depth of research was demonstrated around designing community places, sustainable energy, water quality and supply, new and emerging technology, and Indigenous values."

"A very well co-ordinated team response. Each component of the proposal fits with other components indicating a very collaborative approach has been adopted to development of this proposal. Presentation has linked back to planning and placemaking philosophies and approaches - e.g. the Venn diagram of people, place, and process; the community hub objectives; the integration of natural and built environments." "Inclusion of funding and governance is important to the success of the proposal. Ideas are generally realistic. The proposed home energy management system is a very practical and worthwhile tool. Algae facades are an Interesting conceptual idea worth further exploration."

"This is good and solid review and research student project. It could have been improved with a bit more research on the existing broader context of NAC, i.e. Hunter Region, proximity to other strategic centres such as Newcastle or even Sydney Metropolitan area. There could have been more on the Strategic planning and activation precincts in the vicinity, such as Williamstown."

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**SARCHITECTURE SOLUTION SOLUTION

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SOLUTION**

Our Path - Circular Economy and SDG **Triple Bottom Line** Air, Water, Soil SOCIAL ENVIRONMENTAL IMPACT IMPACT **ENVIRONMENTAL** SOCIAL **OUTCOMES OUTCOMES ECONOMIC OUTCOMES** DESIM Design Engineering Sustainability Innovation ECONOMIC Management IMPACT #NorthArmCoveInitiative

Our Path – through Collaboration to "Net-Zero" Community



North Arm Cove - Constraints

ECONOMIC

Lack of infrastructure is main constraint for further advancement of either RU5 or RU2 zoned land. Area lacks:

- Sewer
- Water
- Stormwater
- Roads

Lack of employment opportunities Lack of business opportunities Pollution is hazard to oyster industry

SOCIAL

Lack of employment
Lack of social infrastructure
Health hazard
Safety hazard due to uncontrolled use
of non-urban areas

ENVIRONMENTAL

Lack of infrastructure – pollution of waterways

Vegetation, overgrowth – bushfire hazard

Misuse of non-urban land for dumping of waste, old vehicles, illegal logging

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Tenure and subdivision holding pattern

The paper subdivision of North Arm Cove has a highly fragmented pattern of ownership, with approximately 2,850 lots being owned by 2,550 separate owners, and most having a land area of less than two hectares. Most allotments, including larger holdings, do not have public or constructed access and are heavily vegetated.

Nearly 1000 original allotments in North Arm Cove have been transferred into Council ownership, with many already in an environmental zone, reflecting their environmental value. The Council ownership pattern is also, extremely fragmented.

Constraints analysis

LOW	MEDIUM	HIGH
flooding or coastal hazards	Environmentally sensitive vegetation	Legal and constructed public road access
steep land of 18% (32 degrees)	Planning for Bushfire Protection	Configuration and ownership
		reticulated water and sewer services
		OSSM DAF mapping

Midcoast Council On-Site Sewage Management Technical Manual

Table 28 Summary of Existing High Risk Village Assessment

Village	Outcomes	Recommendations
• On-cont cont but I	On-site systems negligible contributor to nitrogen export but likely to be significant contributor to phosphorus export.	Existing Development Provision of a community wastewater scheme or conventional sewerage is the preferred long-term servicing strategy for North Arm Cove. Best Practicable Option (BPO) upgrades to existing systems with failing LAAs will provide limited improvement in health risks (within Wyee). Effluent pump out is not considered an effective strategy based on historical
	High health risks within village (due to surcharging LAAs). Low to moderate health risks in receiving waters.	practices in tanker removal frequency. • Provision of a community wastewater scheme would deliver a comparable benefit to conventional sewerage (elimination of residual health risk) at cost. • Provision of a community wastewater scheme would be the preferred long-term servicing option.

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79

From Draft MidCoast Rural Strategy Paper Subdivisions Analysis Report

Date: June 2021

The paper subdivision of North Arm Cove has a medium to high level of constraint.

Primarily these constraints relate to the number of allotments, very high number of land

owners, lack of access to allotments, environmental constraints that would severely restrict development and on-site sewage management options.

In addition, the single road access represents a significant issue relating to isolation and evacuation on bushfire prone land.

Infrastructure

North Arm Cove is accessed by Carrington Road,
Glen Innes Road, Glencoe Street, Market
Street and The Ridgeway, only these roads
provide constructed public road access to any
properties in the paper subdivision or village.
Remaining roads, including privately owned
roads within the paper subdivision, are
unconstructed and may consist of basic bush
tracks.

North Arm Cove has no reticulated water or sewerage services.

From NAC Community web site

www.northarmcove.nsw.au

After heavy rain, it takes about 6 days for the bacterial levels in the water to return to levels that are safe for swimming.

Oysters cannot be harvested for at least two weeks after heavy rain has stopped as they are filter feeders and concentrate any contaminants in the water. The Cove waters have been closed for harvest since the 22nd December, 2020 and are still closed at the time of writing this article on 3rd January, 2021.

North Arm Cove - Opportunities

ECONOMIC

"Paper Subdivision" has ~3500 urban size lots:

- 500 "village" RU5 lots, about 200 developed with only
- Aprox..3000 "non-urban" RU2 lots
 - 1000 lots owned by MidCoast LGA
 - 2400 lots owned by individual landowners
 - 80 lots owned by Walker Corp

Main constraint for progress of North Arm Cove is lack of basic infrastructure.

North Arm Cove represents about 5% of MCC ratepayers

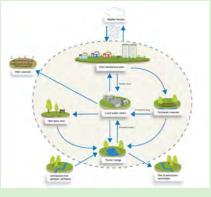
INFRASTRUCTURE

Advancement of technologies has enabled provision of sustainable precinct/communal "micro grid" infrastructure based on Circular Economy principles:

- Integrated water cycle management stormwater harvesting, storage, treatment, distribution, recycling and re-use
- Local power generation, storage and distribution, associated with efficient energy (re)use
- Waste recycling
- Use of smart traffic/road infrastructure technologies in data gathering and distribution for commercial and governance purposes

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VALUE CAPTURE

Provision of infrastructure would more than **10x increase the land value**. That includes increase in value for 1000 land lots owned by council.

Our preliminary calculation is that investment in infrastructure would provide ROI of 400% for local government's land.

IMPACT INVESTMENT

Urban community developed on principles of **Circular Economy** presents extraordinary opportunity to achieve exceptional **SOCIAL and ENVIRONMENTAL ROI**.

INNOVATION – SMART COMMUNITY

Sustainable way of building resilient communities of the future implementing new technologies – IoT, blockchain, AI, energy efficiency, reuse and recycling, data capture.



HOUSING

NSW Housing Strategy calls for building **Affordable and Social Housing** on government land – local government holds 1000 urban size lots

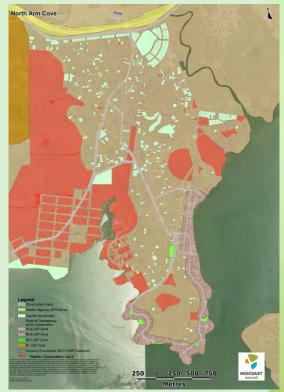
EMPLOYMENT

Creating **Innovation Precinct** for planning, construction, governance of the future urban communities would create opportunities for **high value jobs**.

Community of almost 10,000 would need services, education, health, age and child care, hospitality, retail. **heritage and environmental tourism**.

Planning principles implemented by Griffins are equally relevant today as they were hundred years ago, integrating the urban community with nature (biophilic design) and new technological advances.





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North Arm Cove - Opportunities

SOCIAL

- Rare Cultural Heritage
- Inclusiveness
 - First Nations
 - Intergenerational
 - Multicultural
- Collaboration Citizen's Jury
- Building Resilience
 - Local water harvesting
 - Local energy generation
 - Community gardens
 - Precinct bushfire protection



LSPS planning priorities

P1: One Council, one plan

P2: Foster planning partnershi

Meaningful community
participation in
planning and crating its
own sustainable,
resilient urban
environment

VALUE

STRONG LEADERSHIP AND SHARED VISION



Beyond the metropolis, making the megaregionOverview

The pandemic has created a new "megaregion" consciousness

Rebalancing economic activity between central and suburban CBDs

Greater Sydney

Even if people relocated from cities during COVID, on balance there has not been an exodus from the wider city-region. Including the megaregion in strategic metropolitan planning

Minimising inequity between urbar outer suburban and regional areas

Different levels of government and larger companies are starting to begin this conversation and develop specific working groups.

Living or working 3-4 hours' drive beyond the metropolis



Alianment with CSP

An attractive option for people with the ability to conduct remote, hybrid and flexible work, supported by advances in digital technologies.

Collaboration opportunities with other towns and cities

Alignment with Hunter

Regional Plan 2036 Directions



DESIM

Design Engineering Sustainability Innovation Management L1: We work in partnership with our community and government to ensure council is a trusted and flexible organisation that delivers on their needs

L2: We make opportunities
available for the community to inform decisions that shape our future

L3: We develop and encourage community and civid leadership

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North Arm Cove - Opportunities

ENVIRONMENTAL



1826 - First Australian **Agriculture Company**





1920s





2000s









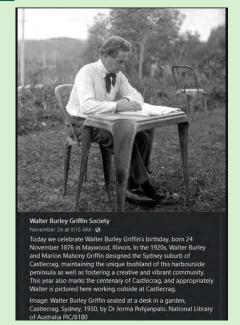




Regenerating natural systems is one of three major points of Circular Economy and we plan to achieve that by collaboration with local Aboriginal community and exploring implementation of traditional land management techniques.

This would be particularly critical in finding innovative ways in providing bushfire protection for the whole precinct. Our intention is to explore flexible use of fire protection zones for food production and recreation.

Original Griffin's plans have over 100ha of communal open space in addition to street planting along wide boulevards and protected foreshore. Providing wildlife sanctuaries in these areas will be explored, in line with Circular Economy principles.



Castlecrag, Sydney -"Paradise on Earth" – How to build town in bush











In his Town planning work Griffin would never allow the surveyors to follow the custom of putting the district to the fire nor cutting swathes through the trees no matter what their majesty. He made this requirement of the men surveying Port Stephens.

Then he was up there he made the acquaintance of King Billy, an aboriginal who worked with the surveyors. Finding Griffin sympathetic King Billy talked freely with him and gave him much interesting information about the native plants. Through him Griffin learned how precise was their knowledge for King Billy could identify at a distance even a dead tree. The aboriginals were interested, as Griffin was, in the character of the form rather than in the minute distinctions which the botanists as a whole center on which in fact gives them the ability to attach names but does not give them real knowledge of the plants they are listing.

Contact with the ancient peoples should awaken us to the fact that they use a different kind of thinking from ourselves an experience which, if we were open minded, would lead us on to the investigating and mastering of that kind of thinking, to take as much pains as we have taken in the mastery of rational thinking in these modern times.

Marion Mahony Griffin, Magic of America

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North Arm Cove - Opportunities

INNOVATION PRECINCT

200 YEARS OF INNOVATION

Modern day innovation in the area started with First Australian Agriculture Company that had headquarter in neighbouring Carrington almost **two hundred years ago** - experimentation started with various types of farming and crops .

In 1918 Griffins have set innovative ways of city planning by selecting, planning and setting out new city:

"Let us face the future of Port Stephens as the New York of Australia and look at the spectacle of a city completely beautiful, correct in its location, in its design and in its solution of its various types of buildings. There is no reason why the earliest buildings as well as the later ones should not be correct and correctly placed and all beautiful for as we have seen in our preceding studies beauty is not an expense but calls simply for the expenditure of mind and spirit which are not depleted by use but the contrary. In other words it calls for the use of human faculties — thinking, feeling and will (doing)."

Marion Mahony Griffin, Magic of America



Design Engineering Sustainability Innovation Management



Planning based on topography 1918



Optimizing house orientation using AI (A2M Architecture)



Circular Economy

- Designing out waste
- Extending use life
- Renewing natural systems



Smart places:

- Internet of Things
- Blockhain,
- Sensors and data acquisition
- Artificial Intelligence
- Digitalization of construction
- Digital Twins

Professor Peter Newman, Curtin University:

" ... new economy, for the next 30 years, is likely to be driven by the Paris Agreement and Sustainable Development Goals (SDGs) agendas (summarized as zero carbon-zero poverty) and will have a strong base in a cluster of innovative technologies: renewable energy, electromobility, smart cities, hydrogen-based industry, circular economy technologies, and biophilic urbanism. The first three are well underway, and the other three will need interventions if not cultural changes and may miss being mainstreamed in this recovery but could still play a minor role in the new economy. The resulting urban transformations are likely to build on Covid-19 through "global localism" and could lead to five new features:

- (1) relocalised centres with distributed infrastructure,
- (2) tailored innovations in each urban fabric,
- (3) less car dependence,
- (4) symbiotic partnerships for funding, and
- (5) rewritten manuals for urban professionals.".

#NorthArmCoveInitiative

Our Team

DESIM-Arch & R&D



Dejan Simovic Architect, Town Planner, Passive House Certified Designer Circular Economy Advisor Technical Advisor UNDP



Tatjana Djuric-Simovic Architect, Town Planner, **NSW Planning Regulation Specialist** Energy efficiency specialist

Back to the **Future** Winning team members

Management



lina Lohi Landscape Architect Master Planner



Noah Watson **Architectural Assistant**

Young company with very experienced professionals.

Design Engineering Sustainability Innovation Management

Sustainability is the center of our approach, enabled by Circular Design, proven Engineering methods, research and Innovation, and effective Management.

For us, design is about solving problems and achieving performance. Not only following procedures but achieving desired outcomes.

Planning is about anticipating problems and addressing them before they are evident.



ALAN JOHNSON Design Consultant Registered Architect NSW Arch RN. 537D(NSW)

Alan Johnson is an award-winning design architect who has delivered iconic projects in Sydney and the Gold Coast during his 30 year career. He is known for his pragmatic but elegant design solutions in complex high-rise mixed use developments of up to 65 storeys as well as for his environmentally responsive façade development in all scales of work. He works closely with clients and consultants to achieve mutual goals, leading multidisciplinary teams for the effective delivery of projects.



EMINE MEHMET Consultant (Interior and Wallbeing)

Wellbeing Strategist (Built Environment) WELL Accredited Professional Fitwel Ambassador

Emine has an extensive background in Interior Design and Project Management for over 20 years. Her portfolio consists of an impressive array of projects ranging from corporate offices. Government and Defence Projects to residential developments. She has worked for companies such as Meriton Apartments and Woods Bagot. She consults on projects to create spaces that support health, wellbeing and engagement



TREVOR JOY BIM Consultant

BIM Specialist, Enravel

As BIM Manager, Trevor leads the Enravel BIM services team locally and internationally. He has long term experience working with leading developers - builders (BIM Manager at Meriton Apartments for 8 years) architectural practices and integrated design teams. He has taken part in developing design and BIM standards for many employers and clients.



ALEX POPOV Building Designer Passive House Certified Designer

Alex has joined DESIM in January 2020 after successfully completing his Passive House Designer certification. Since then he is involved in few very interesting and complex Passive House projects. He is also valuable member of our R&D team.



PIOTR WAWRZYCZNY Building Services Manager

Piotr has more than 20 years experience in building services project and stakeholder management through design, documentation and delivery phases. He has been involved in some of most significant projects working for Mirvac, Westfield, Built and John Holland. His expertise ranges from residential commercial, retail, mixed and master planned high-end projects.



DRAGAN HRANISAVLJEVIC Consultant (Hydro)

Infrastructure, dp8 engineering

Dragan is an accomplished business leader, project manager and water engineer with more than 35 years of experience in water systems engineering and management.

He has held senior management and leadership positions in consulting organisations (MW)-Australia, Water Research Laboratory of UNSW, Hatch Associates), a cutting edge cleantech company (Geo-Processors), a major Australian public sector utility (Sydney Water Corporation), as well as a leading multinational private utility providing water and wastewater management services many countries around the world (Suez Environment)



Harshavardhan Moghe Architectural Assistant

#northarmcoveinitiative www.notharmcove.org.au

https://www.facebook.com/NorthArmCovelnitiative #NorthArmCoveInitiative

Our Team – Smart Places

DLR Group (USA)



project overview.

Dear Sir/ Madam:

DLR group is delighted to be asked by Desim Arch to potentially take part in the re-imagination of the North Arm Cove master plan. Like WB Griffen, our firm has deep roots in the American Mid-West, and like Griffen here in our Seattle office we started designing signature buildings and master plans at the beginning of the 20th Century.

We are centered around the pursuit of sustainability and responsiveness in our designs. WB Griffen's quote expresses this well, if not from another time:

"I am what may be termed a naturalist in architecture. I do not believe in any school of architecture. I believe in architecture that is the logical outgrowth of the environment in which the building in mind is to be located".... From the New York Times, Sunday June 2, 1912.

One of my roles at DLR Group is to lead our Design Agency efforts. This approach to projects is to find ways of letting local communities have a say in their own future, through outreach, empowerment, and equity. The involvement of residents and neighbors will be a key part of this exercise. We have experience with tribal partners here in the states and would look forward to working with local aboriginal neighbors as and when its relevant to them.

Our Research and Development team and our Planning team have been designing smart cities and exploring what the future of these looks like, for a number of years now. Merging our thoughts and efforts with the Smart Places Strategy would doubtlessly bear fruit and indeed teach us a thing or two whilst we are delivering our design. Questions about digital density versus physical density will come to light and will likely be useful in terms of managing local resources and ecosphere needs.

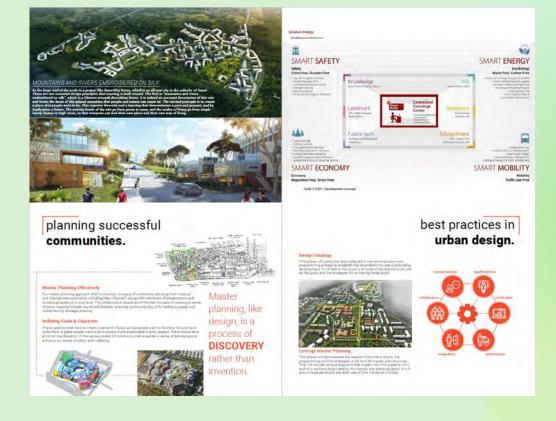
Kind regards





Design Engineering Sustainability Innovation Management









Our Team - Rgenerative Design

A2M Architects (Belgium/USA)

energy targets & environmental objectives

permacity

how are we going to live tomorrow? How are we going to work? How can we create the changing conditions for a future-proof development that answers the issues of

what if the city of the future could not only have a very able to regenerate the environment?

we propose to create a new neighborhood that can embrace the principles of permaculture; the "permacity" in other words, we would create an urban system inspired by the framework of natural ecology in which each individual element contributes to the well-being of others. Therefore, a "permacity" enables a city to function as a sustainable ecosystem.

the term "permacity" is derived from "permaculture" or "permanent agriculture". "One of the fundamental models of permaculture is that of the forest, composed of seven stratas that complement each other and maintain a dynamic and balanced

sharing water and nutrients. As such, a "permacity" would become an urban center that evolves in

we are able to offer:

- > Passivehouse at no "extra cost" > Passivehouse with high-end design (full-glass building and signature architecture, for instance)
- > Passivehouse taken into action from theory to reality together with builders

we hereby suggest three different levels of involvement through which A2M-M2A could become part of your project team:

- > at the building level

a paradise on earth? maybe... regenerate the environment and connecte the city to its people? absolutely!



permacity

A2M

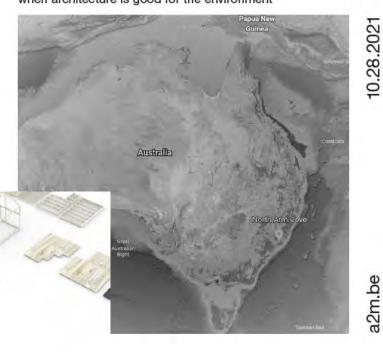
DESIM

Design Engineering Sustainability Innovation Management

not only did we integrate embodied energy studies into our work, but we also enabled the possibility to easily disassemble construction elements to reuse them at the end of each building's life cycle.

NAC's roadmap to zero emission

a suburbian community following the principles of a regenerative system: when architecture is good for the environment



A₂M comfort CO2 neutral WELL A project acting like a forest combining well-being, quality of life and a completely neutral impact on the environment, demonstrating that a decarbonized and responsible savings: 3 017 Teq02/yr future is possible. 1 480 acres of FOREST Paris gardens, squares, parcs. Integration of by creating a - permacity - the project will not only have with savings of more than 3 017 T eg CO2/vr. the project will save as much CO2 as all of the green areas in the nerate the environment.

treatment through storm water infitration together with

case study #2: Arizona

300 houses, a convention center, a hotel & facilities:



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North Arm Cove

australia

Our Team - Infrastructure

Stantec (Au/USA)

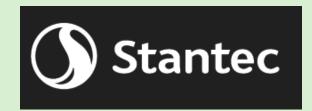
For the North Arm Cove Development Stantec believe we can offer value to the project in the following areas:

- Urban Design;
- Landscape Architecture;
- Sewer Water Treatment and Re-use;
- Rainwater treatment and distribution;
- Site Wide Waste Management;
- Smart Road design (Data capture, traffic management and smart cities technology);
- Roads construction advice;
- On Site Energy production (sustainable production, storage and use of power on site).

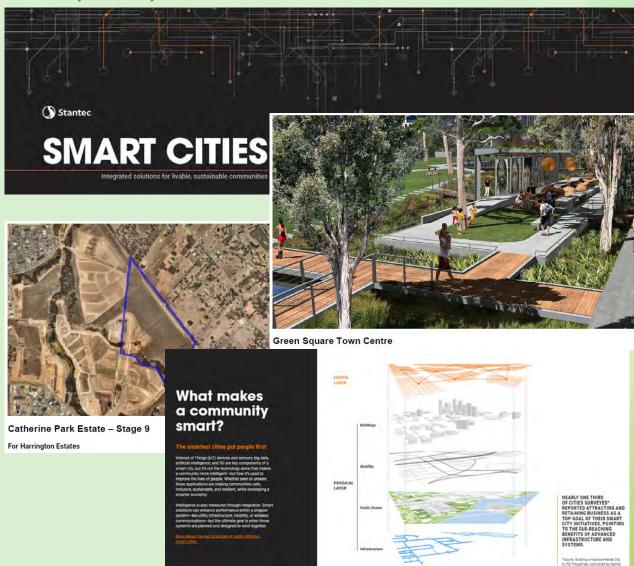
At Stantec, our culture revolves around the key message: **Design with community in mind.**

DESIM

Design
Engineering
Sustainability
Innovation
Management



Smart cities systems achieve their greatest results through data and integration—delivering those solutions is no different. At Stantec, we bring multidisciplinary teams together to uncover unexpected ideas and benefits. It starts by understanding the full ecosystem and bringing the right experts—both in policy development and planning, as well as designers well-versed in the details of smart buildings and infrastructure and pairing all of that with powerful data analytics tools and cybersecurity.



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Our Team - Water

BMT

BMT is a leading international multidisciplinary engineering, science and technology consultancy offering a broad range of services, Water quality particularly in the energy, environment, shipping, ports and logistics and defence sectors.

Operating domestically for nearly 50 years, BMT now has more than 150 professionals based in Australia, specialising in Water and Environmental Management with a track record of successful project delivery. Hydrology and flood hydraulics

Marine, freshwater and terrestrial ecology

Understanding the complexities of water quality dynamics and developing

Environmental approvals and management

BMT specialises in:

- Environmental impact assessments
 - Hydrology and flood hydraulics
 - Floodplain management
 - Flood intelligence
 - Water quality
 - Climate change
 - Marine, freshwater and terrestrial ecology
- Coastal processes and management
 - Integrated total water cycle management
 - Expert services
- Geographic information systems and
 - web development
 - Field data capture
 - TUFLOW software



Flood intelligence



BMT has prepared North Arm Cove Stormwater Management Strategy Report (2017)

MT has developed a suite of flood study add-ons to ensure that the informat developed in flood studies has meaningful, real-world applications. We offer a of services to help councils and emergency services relate real-time information necessary on the ground actions, such as issuing warnings to the community, roads or initiating evacuations.

Climate change

Coastal processes and management





total water cycle management



Management

<u>Our Team – Investment and Delivery</u>

altogether. & Trio

Altogether is Australia's leading independent multi-utility, providing infrastructure that facilitates the efficient delivery of affordable and sustainable communities of the future.



The backbone of Altogether's local energy solution is an Embedded Energy Network ("EEN"). As an authorised retailer, Altogether generates sustainable power behind the 'gate' via a combination of solar farms and solar panels on individual home rooftops, and supplements this 'fill' and solar panels on individual home rooftops, and supplements this 'fill' and the purchased from the grid. Whist customers are at all times free to choosu

2.6 Telecommunications

surchased from the grid. Whist customers are at all times free to choose sltogether's competitive retail pricing, one stop shop packaging and sup-

Telecommunications provides the backbone upon which the entire integrated utilities network is coordinated and predictive efficiencies schieved. It crastes opportunities to embrace future advances in both technology, materials and equipment. With modern society increasingly reliant on a reliable, high speed network, fraggether's network enables local communities to take full advantage of the control the integrated utilities model facilitates.

Rogether has strategic alliances with leading telecoms design & operation FTTP carriers enabling it to fiver white label solutions in direct competition to the existing major suppliers. Our typical







BILL DONOHOE



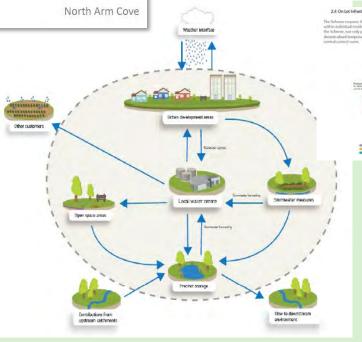
ZOE MELIS



CARLOS LOPEZ

altogether.

Owned by leading infrastructure asset manager HRL Morrison & Co, Altogether has an enviable track record and financial backing, inclusive of both Australian & New Zealand government superannuation funds. Our customer centric, flexible and responsive approach enables Altogether to deliver a superior outcome in terms of timeliness, value for money and sustainability that gives our business partners key competitive advantage





Kurri Kurri Hydro Site (Altogether

Trio Property Group prepared a Request

for Proposals (RFP) for a site in the lower Hunter Valley. The client sought an RFP for

a development partner to join them in the delivery of approx 2,000+ residential

allotments as well as over 200ha of industrial and business zoned lands.

then Flow Systems)



MORRISON&CO

Design Engineering Sustainability Innovation Management Altogether is licensed under the *Water Industry Competition Act 2006* (WICA) to own and operate water infrastructure and to provide multiple water services including drinking water, recycled water, and wastewater services at several communities across New South Wales. It has demonstrable experience managing complex water utility schemes in new communities, for example at Box Hill in Sydney's Northwest Growth Corridor, Central Park at Broadway and Huntlee in the Hunter Valley.

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<u>Our Team – Education, High Performance</u>

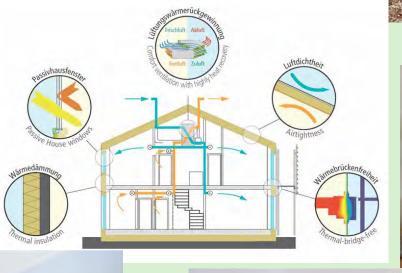
Blue Eco Homes



Certified Passive House Builders

The future of healthy housing is here. Improve your family's health, comfort and environmental impact with a Passive House.















Our Team - Governance

newDEMOCRACY Foundation



IAIN WALKER

lain Walker is Executive Director of the newDemocracy Foundation (nDF) in Australia, a role he has held since 2011. Iain has led over 20 trial projects at local government and state government level including projects for State Premiers on both sides of politics. The topics have ranged from long-term budgeting for the \$4bn City of Melbourne Financial Plan to the potential for a high-level nuclear waste storage facility in South Australia. In the water industry, nDF designed the 2017 Citizens' Jury process for Yarra Valley Water.



POLITA CAMERON

Polita is Director of Engagement & Outreach at the newDemocracy Foundation. She has a background in innovation and community building, having been the National Program Director for The School of Life in Australia.

She has worked extensively in the not-forprofit and arts sector and has over 10 years of experience as a facilitator and program designer.

DESIM

Design Engineering Sustainability Innovation Management

newDEMOCRACY

#NorthArmCoveInitiative

When given the authority, time, and information, everyday people take the tough questions, side-step party lines, and deliver sensible answers.







newDemocracy applies 5 clear principles to all of our work

Random Selection:

Governments inevitably hear from the noisiest voices who insist on being heard. In contrast, society trusts 12 randomly-selected people on a criminal jury to assess evidence, discuss their views and reach a consensus recommendation because random selection generates "people like us". Our process gets beyond the enraged and the articulate because the public would perceive them as having a bias.

Time:

Most policy problems which warrant the investment in a jury will be complex topics, so we need to allow people the time to educate and immerse themselves in the topic. We generally take around six months to deliver the process from beginning to end – as a guide, citizens need at least 40 hours in person, meeting five to six times to meaningfully deliberate and find common ground without feeling pushed toward a preordained outcome.

Information:

Neutrality of information is a core principle, and we are careful to alert all juries that all writers have their own bias and perspective and they need to critically analyse this. To counter the view that "you can find an expert to say anything" we focus the start of a process on asking "what do you need to know... and who would you trust to inform you" – and use this as a way of selecting the speakers and input for subsequent jury meetings.

Clear remit:

A plain English question, phrased neutrally is essential. This is the most time consuming aspect in finding agreement with a sponsoring government body. Everyday people (not impassioned activists) need to instantly understand the problem to care enough to get involved.

Upfront authority:

To get everyday people in the room making a considerable time commitment, they need to know that the recommendations they reach mean something and won't be consumed within the bureaucracy.

<u>Our Goal – Sustainable Community - Masterplan</u>

INNOVATION PRECINCT MASTERPLAN PROJECT

PROJECT SCOPE

There are two major parts of the scope:

- 1. producing content of a master plan for a community based on original Griffin's subdivision layout but transformed into **beyond "net-zero"**, **permacity** type of community:
 - Innovation Precinct applied research, exploring future technologies in infrastructure, construction, community governance
 - Transport local, regional, interstate, international
 - Land uses
 - Housing regional community (about 3500), individual lots already subdivided.
 We'd need to propose morphology most adequate for various parts of subdivision lot sizes vary from 300m2 to 1500m2
 - Employment resilient , post COVID, innovative approaches, shared facilities, etc
 - Tourism close to Newcastle International Airport, Heritage Tourism, Environmental Tourism
 - Education primary, secondary, uni/research campus
 - Retail, Entertainment, Hospitality
 - Parks, Nature reserves, wildlife sanctuaries, recreation
 - · Heritage including Aboriginal
 - Infrastructure location for local infrastructure facilities
 - water harvesting, water storage, recycled water storage, water recycling facility,
 - potential small desalination plant
 - power generation to be incorporated with built environment (roofs), power storage (exploring alternative ways, not only batteries collecting and
 - recycling waste
 - smart roads and traffic infrastructure
 - Data capture, storage, utilization
 - Maritime facilities
 - · Local food production communal gardens combined with education and bushfire protection
 - Bushfire protection including traditional ways of land stewardship
 - Staging of the project
 - Scaling



PROJECTED OUTCOMES

- 1. Master plan
- 2. Digital Twin
- 3. SRCe Pathway to implementation

- 2. Incorporating innovative methods and technologies
 - Energy efficiency
 - Shared economy
 - Flexibility of use
 - Recycling
 - Circular Design, Digital Twin,
 - IoT
 - AI
 - blockchain, smart contracts, P2P
 - · etc.
- Establishing governance body Sustainability Research Centre (SRCe)
 ensuring and maintaining sustainable outcomes. Based on principles of
 collaborative approach, community participation, measurable outcomes economic, social, environmental, technological and impact on urban form.

PROJECT PROGRAM

Overall, we expect about 9-month initial project to achieve a master plan. Timing from March next year to end of 2022



From: noreply@feedback.planningportal nsw.gov au

To: DPE PSVC Hunter Mailbox

Subject: Webform submission from: Draft Hunter Regional Plan 2041

Date: Friday, 4 March 2022 4:32:03 PM

Attachments: north-arm-cove-initiative---mar22---region pdf

Submitted on Fri, 04/03/2022 - 16:26

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

No

Info

Emai

Suburb/Town & Postcode

North Arm Cove

Please provide your view on the project

I support it

Submission file

north-arm-cove-initiative---mar22---region.pdf

Submission

I write with sugges ion for further improvement to proposed amendments. My planning and R&D practice DESIM-Arch is working together with land-owners at "paper-subdivision" of North Arm Cove to include this historic subdivision in future development of the Hunter.

MidCoast Council has neglected development of their sou hern region on shores of Port Stephens for very long time. Results are huge problems for whole LGA.

However, Council owns 1000 urban size lots in this subdivision initially planned by Walter Burley Griffin according to his environmental principles. These lots, if developed could deliver more han \$300mil profit to council, in addition to additional rates, affordable and social housing, employment in innovative future-proof jobs as well as heritage and eco tourism.

Attached here is our proposal to resolve North Arm Cove subdivision through allowing new way doing development - based on Circular Economy, Regeneration, Innovation, Resilience.

We are proposing new way of collaborative planning including community, research and industry. Collaboration through "ci izen's jury" process hat would extend into community governance of their community by forming Sustainability Research Centre and innova ion precinct for implementation of advanced technologies in urban development.

Our proposal is supported by international team of experts in smart, regenerative development, innovative ways of delivering precinct based urban infrastructure, bushfire protec ion, wildlife protec ion, etc.

Our proposal is aligned with State's policies and strategies on Housing, Circular Economy Transition, Infrastructure, Smart Places, Design and Places, etc.

We have support from heritage institutions as well academic institutions.

We have also provided comparative to some other proposed growth areas in Port Stephens and MidCoast council. Lot of hese are examples of placing people and heir houses in dangerous or sensitive areas.

I agree to the above statement

Yes



Mr Dan Simpkins Director, Central Coast and Hunter Region Planning and Assessment NSW Department of Planning and Environment PO Box 1226 NEWCASTLE NSW 2300

via email: hunter@planning.nsw.gov.au

Dear Dan

Re: Draft Hunter Regional Plan 2041

Thank you for the opportunity to make a submission to the draft Hunter Regional Plan 2041 (the regional plan).

The vision, objectives, strate

• evidence-based decision making informed by the use of data from the Urban

for consideration in the finalisation ning, process reform, and

A collaborative flutter approach to rezonling

artment of Planning and Environment ollaborative approach to rezonings in the rezonings and achieve the

- Streamine, simping and standardise processes for Hunter councils and proponents
- Target key barriers to delivery in the planning proposal process, and
- Ensure Hunter councils and the Department see a return on the investment in regional and local strategic planning and the adoption of local strategic planning statements.

PORT STEPHENS COUNCIL



At a workshop in September 2021 hosted by the Hunter JO, the following matters were identified as key areas to improve in order to achieve a better rezoning process:

- A standard process for the resolution of agency issues
- · Standard agency advice on specific issues
- Standard Gateway information requirements
- Standard Gateway conditions
- · Planning proposal templates, and
- Lodgement forms.

At the workshop, a standard process for the resolution of agency issues, as well as standard agency advice on specific planning issues, were identified as key issues in the planning proposal process. The inclusion of more detailed strategies and actions in the regional plan on these matters will assist in achieving the resolution of any agency issues that may arise during the rezoning process. This could potentially be achieved by further detailed guidance on the regional interpretation of Ministerial directions and the Minister's Planning Principles.

Any related supporting administrative measures and regional plan during the rezoning process has merit. With the finalisation of the regional plan, Port Stephens is eager to continue its involvement in 'A collaborative Hunter approach to rezoning' with the Hunter per collaboration on strategic Hunter region.

stephens) was adopted in 2020. achieve the following priorities:

Facilitate liveable communities.

ue to see local strategic plans
on. The inclusion of direct actions in the
strategic plans (for example the Port
Port Stephens and local place plans) is

The regional plan should include strategies and actions that directly support streamlined processing of planning proposals for housing, where consistency with local housing strategies is demonstrated. In Port Stephens, a 'criteria-based' approach is adopted for the consideration of greenfield sites. It is requested that the regional plan include this flexible local criteria-based approach to the consideration of greenfield housing sites. This

PORT STEPHENS COUNCIL



approach contributes towards the supply of land for housing and facilitates the implementation of Live Port Stephens.

NSW Regional Housing Taskforce

The need to address housing affordability in regional areas is acknowledged through the establishment of the NSW Regional Housing Taskforce (the Taskforce). The decision to establish the Taskforce to address the critical issue of housing affordability in the regions is to be commended. It is important to note that housing affordability has worsened during the COVID-19 pandemic within the region, including Port Stephens. This issue is becoming more critical to address.

The release of the Taskforce's Recommendations Report in October 2021, coinciding with the exhibition of the regional plan, provides an opportunity to take meaningful action within the Hunter region and Port Stephens to address housing affordability. It is highly recommended that, prior to finalisation, the regional plan is reviewed to ensure it includes strategies and actions that directly respond to each of the recommendations in the Taskforce's Recommendations Report.

eed for greater alignment of infrastructure with planning decisions. The 'infrastructure first and place-based framework' should be strengthened within the regional plan wherever possible. This could be

with the infrastructure plans of (for example Transport for NSW

I housing affordability through the Affordability Delivery Program is y centres, explore opportunities for come fragmented land ownership estyle estates. The regional plan assist councils in the preparation

NCW Diamaina Datara

e program of reform to streamline, achieve improved planning outcomes.

- The Minister's Planning Principles
- Ministerial Directions
- SEPPS (including the Design and Place SEPP)
- Employment Zone Reforms and
- Contributions Reforms.



For 'line of sight' the regional plan should be reviewed prior to finalisation, to ensure that it aligns with these reforms to the planning system and their intended outcomes. This will provide greater certainty that local place plans and planning proposals, prepared to be consistent with the regional plan, will be prepared and implemented efficiently.

Ensuring alignment of the regional plan with statewide planning system reforms will assist councils and proponents in meeting new benchmark timeframes set by the Department and improve the consistency of planning proposals with the provisions of the new Local Environmental Plan Making Guideline (NSW Department of Planning, Industry and Environment, December 2021).

PART 1 MAKING IT HAPPEN

<u>Urban development program, Infrastructure first and place-based framework (including appendix C infrastructure first and place-based delivery)</u>

Evidence based planning in relation to housing supply, through greater use of the Urban Development Program, is a o accommodate evidence from councils and the housing industry that demonstrates the need for additional land for housing supply, particularly given the current housing affordability crisis. In particular, there cknowledge the potential shortfall in tely to occur prior to its next review.

Il severely limit the opportunity for planning is being undertaken to evelopment, consistent with the Port Port Stephens. However, there lan of the variation across the for infill development. Port

The regional plan should be amended prior to finalisation, so that it does not preclude the rowth areas, including at Walllalong portfalls in housing supply. Provision tes. Precluding these sites from removes the flexibility to respond to oming critical in Port Stephens. The

regional plan should support a place planning approach for these areas, supported by demonstration of demand, site and strategic merit and 'infrastructure first', to enable their consideration on planning merit.

The draft regional plan has a focus on large scale place planning (refer to Table 3 Hunter regionally significant growth areas). The regional plan should confirm the type and scale of

benchmarks intended by the

housing supply.

tres. Greenfield urban development



a project that is not required to be considered by the place-delivery group, and remains primarily a local place planning matter.

The regional plan should support place-planning being undertaken at the smaller local scale, under frameworks that have already been established by local councils. Port Stephens has established its own framework to facilitate the preparation of local place plans. Local place plans are currently adopted or under preparation for Karuah, Shoal Bay, Medowie, Anna Bay and the Rural West. The regional plan could include strategies and actions to support and streamline the preparation of smaller scale, local place plans. This should include an action to work with councils to identify agency consultation and study requirements for the preparation of local place plans, and strategic Gateway determination functions for place plans to reduce time frames for their implementation.

PART 2 OBJECTIVES

OBJECTIVE 1 DIVERSIFY THE HUNTER'S MINING, ENERGY AND INDUSTRIAL CAPACITY

This objective is heavily foci

rence to the role of key

manufacturing and industrial areas and employment opportunities in the Hunter region and

in Port Stephens.

al employment areas of Tomago d be highlighted in the regional stle, the Williamtown SAP, the Port estment and employment o and Heatherbrae will assist in the uraging infill development in nearby

Inded objectives of the proposed , which includes Tomago. Tomago Iminium, and a number of other

major industries, businesses and renewable energy projects that will benefit from

rgy Zone. The Renewable Energy Zone newable energy industry into the future rsify the Hunter's mining, energy and

RMINATION FOR ABORIGINAL

COMMUNITIES

The objective to ensure economic self-determination for Aboriginal communities is supported. Port Stephens Council has a positive relationship with the Worimi Local Aboriginal Land Council and the Karuah Local Aboriginal Land Council. The potential for inclusion of further strategies and actions to achieve the objectives of this action, in

PORT STEPHENS COUNCIL



consultation with Aboriginal communities, should be considered in the finalisation of the plan.

OBJECTIVE 3 CREATE A 15 MINUTE REGION MADE UP OF MIXED, MULTI-MODAL, INCLUSIVE AND VIBRANT LOCAL COMMUNITIES

The vision and objective for the creation of 15 minute neighbourhoods from urban to rural communities, and 30 minute connected communities has the potential to achieve substantial social, economic and environmental benefits. Many of the existing centres, towns and villages in the Port Stephens LGA display the characteristics of the 15 minute region, and have the potential to build upon this objective under the regional plan.

To further achieve the objective of mixed, multi-modal, inclusive and vibrant local spaces, investment in high quality public spaces, town centres, facilities and transport is needed. Councils often have limited funding capacity for this supporting infrastructure. Port Stephens is consistently working to plan for and invest in its local community infrastructure and public spaces.

The draft regional plan shou

bjective. This should include more

detailed strategies and actions for funding programs and partnerships to assist in implementation of the Raymond Terrace Public Domain Plan and the Nelson Bay Public

ese two key strategic centres will by the regional plan.

DS DIVERSE HOUSING AND

Swan Bay' are identified as
r to being finalised any reference in
dated to 'Swan Bay' only. This will
posed 'potential future growth area'
d for housing, to be developed
an should include actions to ensure

growth within Karuah will continue to be considered consistent with existing local plans.

s a future growth area in the regional of accommodate future population dhousing in Port Stephens.

proportion of infill development in centres aligns with a number of Outcomes and Priorities of Live Port Stephens and the Port Stephens Local Strategic Planning Statement. Within Port Stephens, the strategic centres of Raymond Terrace and Nelson Bay provide the greatest potential for achieving the intended infill benchmarks. The regional plan could be updated to directly encourage infill housing in these centres, in particular in Raymond Terrace. One way to achieve this, is to include a specific action to support infill housing in

PORT STEPHENS COUNCIL



Raymond Terrace, including an increase in building heights to facilitate redevelopment and encourage investment. Another action should be to support the continued implementation of the Nelson Bay Strategy.

The aim for an optimum density of 50-75 dwelling per hectare is a substantial increase from existing densities in Port Stephens. The regional plan should clarify those centres where an increase in density of this amount is sought by the Department and how it will be achieved.

Illustrations could be included in the regional plan to communicate the intended planning outcome of development at the various intended densities under the regional plan.

The provision in the regional plan for support for community driven innovative housing solutions, such as prefabricated and manufactured housing, 3D printed housing, and tiny houses, is supported to assist in addressing housing affordability. The regional plan should include more specific actions on how councils can facilitate the delivery of community driven innovative housing solutions. An example may be through publishing user friendly guidelines on approval pathways or exemptions for innovative housing, for example a regional guide to the plannir

The identification of potential future growth areas at Wallalong and Swan Bay is supported. Subject to place planning, including demonstration of site and strategic planning, and

eclude the investigation and g during the 'lifespan' of the diversity of housing choice, and re part of the key outcomes for Statement.

ousing requires review to ensure it part of Kings Hill and Fairlands , Port Stephens is able to assist the shown in Figure 2 is current.

gional plan is supported (Strategy

4.7 Lifestyle villages, page 43). Live Port Stephens acknowledges the appeal of lifestyle

ing supply. Live Port Stephens inclusion in the regional plan, to guide Port Stephens, page 30). The regional ction to set a suitable LEP framework e demand for this housing choice and pply and diversity. Port Stephens is

seeking to address this type of housing in its Housing Affordability Delivery Program and would benefit from further guidance to provide for this type of housing in the regional plan.



OBJECTIVE 5: INCREASE GREEN INFRASTRUCTURE AND QUALITY PUBLIC SPACES AND IMPROVE THE NATURAL ENVIRONMENT

The regional plan should be updated to include acknowledgement of the connection between water and settlements in the Port Stephens Local Government Area. This includes locations such as Seaham, Medowie, and areas located in proximity to Grahamstown Dam, the Williams River Catchment, and the Tomago and Tomaree Sandbeds. Raymond Terrace also has close connections to the Hunter River for historical, commercial, recreation and amenity purposes that should be acknowledged.

The regional plan would benefit from the inclusion of objectives, actions and strategies to support the protection of koalas and koala habitat in the region, particularly given the significance of the koala population in Port Stephens and the recent release of the NSW Koala Strategy. The draft plan should also consider the significance of local and regional biodiversity corridors in Port Stephens, which provide critical connectivity for local populations such as the Port Stephens Koala population. The cumulative impacts of development must also be considered when balancing the outcomes of sustainable development.

Programs under preparation by Hunter Councils to help inform coastal management and identify coastal hazards in planning decisions in the regional plan.

<u>RESILIENCE AND SUSTAINABLE</u>

that many commercial town re subject to flooding risk. The enable the consideration of all centres, that can contribute to the region, including at Raymond ood prone land that responds to s.

OBJECTIVE 7: PLAN FOR BUSINESSES AND SERVICES AT THE HEART OF

ct reference to Raymond Terrace as a rlestown, Morisset and Maitland aring the Terrace Economic Zone investment in, the commercial core of

Raymond Terrace. The regional plan should include an action to support the delivery of the TEZ project to assist in its implementation, including any related planning proposal.



OBJECTIVE 8 BUILD AN INTERCONNECTED AND GLOBALLY FOCUSED HUNTER

Figure 5 Hunter inter-region transport connections should be updated to identify Raymond Terrace. The map should also be updated to identified the route of the proposed M1 extension. The location of Raymond Terrace adjacent to Pacific Highway Corridor provides it with close transport connections to the wider region, particularly to Newcastle, Newcastle Airport and the Port of Newcastle. The proximity of Raymond Terrace to transport infrastructure and global Gateways provides an excellent opportunity for its future that needs to be reflected in the regional plan.

The regional plan should include more strategies and actions for the improvement of public and private transport links between regional centres and global gateways. For example, Raymond Terrace is located a 15 minute drive from Newcastle Airport, making it the closest strategic centre in the Hunter region to this facility, the RAAF Base Williamtown, and the Williamtown SAP. The regional plan should include a strategy and action for increased public transport investment in Raymond Terrace.

PART 3 DISTRICT PLANNING AND GROWTH AREAS

The inclusion of Raymond Terrace, Medowie, Nelson Bay and Fern Bay as priority

Priorities 'Housing within 30 is supported. Actions and ousing in these locations needs to

he implementation of the Fern Bay s Council and the City of Newcastle gy has the ability to provide nities within 15 minutes of the

s one of the stand-alone 'District

Planning Priorities' (similar to the inclusion of Newcastle City Centre, Maitland Strategic

Terrace plays an important role as a ent nodes (including Williamtown, in the Hunter. People stop to use and facilities, and it has the potential to assengers travelling to and from the lude increasing building heights in the

Raymond Terrace commercial centre, support for the TEZ project, and improvements to the public domain through the continued implementation of the Raymond Terrace Public Domain Plan.



Figure 7 – Greater Newcastle district should be updated to include the identification of Fern Bay – North Stockton centre, following the adoption and ongoing implementation of the Fern Bay and North Stockton Strategy by Port Stephens Council and the City of Newcastle in 2020.

Figure 8 – Williamtown regionally significant growth area. The status of a number of sites indicated in this Figure requires review. Prior to being finalised, Port Stephens is able to assist the Department in ensuring that the status of various sites is current.

HINTERLAND DISTRICT

The inclusion of the priority in the plan for rural enterprises and diversification is supported. This aligns with the Port Stephens Rural Economic Development Planning Proposal (PP-2021-4405). A local Rural West place plan is also under preparation to: define local character and aspirations; address tourist and visitor/agritourism product development; support proactive community groups and businesses; identify future opportunities; and provide an action plan for economic development and events. The regional plan should reference support for the preparation of local place plans that align with its priorities for rural enterprises and diversi

The inclusion of Wallalong and Swan Bay as 'potential future growth areas' is supported, with the flexibility within the regional plan for the consideration of these areas as outlined

the delivery of outcomes including his should include for example, a and water infrastructure to facilitate

ence 'Swan Bay' instead of 'Karuah

The regional plan should include reference to Nelson Bay strategic centre. This will reflect,

Nelson Bay Strategy and Delivery
Land the community. Consideration
ne Tomaree Peninsula, given its
ues and the demand for housing in
sing options in the Coastal District
For example, the Taskforce has

identified that the cost of housing for essential local workers is identified as an issue that needs to be addressed in regional areas. There is growing evidence that housing affordability for essential workers is becoming a pressing issue in the Coastal District and in Port Stephens. The regional plan needs to include strategies and actions to address this issue.



The acknowledgement of the importance of oyster farming and aquaculture in the Coastal District is supported. Port Stephens is host to a significant oyster and aquaculture industry. Prior to being finalised the regional plan should be updated to include the importance of this industry in the Port Stephens LGA.

The regional plan should also include reference to the importance of regionally significant wetlands and their importance and provisions for their protection under various policies including State Environmental Planning Policy (Coastal Management) 2018.

Figure 28 – Coastal district should be updated to acknowledge or identify additional significant local centres in the Port Stephens LGA. This includes Salamander Bay, Soldiers Point, Tanilba Bay and Lemon Tree Passage.

Thank you for the opportunity to make a submission to the regional plan. Council looks forward to working with the Department to continue to achieve innovative and sustainable planning outcomes under the regional plan.

Should you have any questions or would like to discuss the matters raised in this submission, please contact



4 March 2022

From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Friday, 4 March 2022 5:00:36 PM

Attachments: psc-submission-to-hunter-regional-plan-2041---4-march-2022 0.pdf

Submitted on Fri, 04/03/2022 - 16:58

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info

Suburb/Town & Postcode

Raymond Terrace 2324

Submission file

psc-submission-to-hunter-regional-plan-2041---4-march-2022 0.pdf

Submission

Please refer to attached submission PSC Hunter Regional Plan 2041 - 4 March 2022

I agree to the above statement

Yes

SUBMISSION ON DRAFT HUNTER REGIONAL PLAN 2041

SUMMARY

I am the owner of the land at 234 Carrington Road, North Arm Cove (MidCoast Local Government Area, Coastal Hunter district), currently without dwelling entitlement and part of paper subdivision.

In general, I support all big ideas and the vision presented in the Draft Hunter Regional Plan 2041 (Draft RP).

However, I would like to propose that North Arm Cove (NAC) is included as one of the growth areas where future urban development should occur in collaboration between more than 2,500 existing individual landowners, the Council, State Government and infrastructure providers.

I support the sustainable development of NAC and successful realisation of the original subdivision created more than 100 years ago by Walter Burley Griffin. The NAC existing subdivision should be listed on the NSW State Heritage Register. It is an important National and State cultural heritage location, equal to the existing subdivision of Castlecrag (Willoughby Council, Sydney) or the original plans for Canberra.

Considering current disastrous flooding in NSW, it must be noted that North Arm Cove is not at risk of flooding, unlike the area of Tea Gardens/Hawk Nest or Karuah- Swan Bay identified as future growth areas.

North Arm Cove is 30 minute drive from the Williamtown Special Activation Precinct and can be identify as one of the priority locations for future housing.

PROPOSAL

As outlined in the draft Regional Plan Hunter 2041¹,pg. 16, 'place-based approach to development planning requires infrastructure providers, the development industry and public authorities to take an integrated and coherent place-based approach to land use planning. For NAC it means a collaborative effort of thousands of individual landowners and enabling and supporting State and local public authorities. A catalytic opportunity-link infrastructure is already in place in the form of existing historical subdivision and a built road network.

The best way to protect the heritage of North Arm Cove is to:

- a) recognise development potentials as future urban community and include the subject land in the Hunter Region Urban Development Program at State level and council's Housing Strategy at local level due to its existing subdivision pattern of high urban design quality, and
- b) implement a mechanism to overcome longstanding barriers to realise the development potential of paper subdivisions as outlined in the NSW Planning for Paper Subdivision Guidelines (i.e., establish a Development Authority to manage the reinstatement of dwelling entitlements, prepare a Development Plan based on Griffin's urban design and planning principles and new innovative technology for infrastructure provision and keep the existing historic subdivision intact, wherever possible).

1

¹ https://dpe.mysocialpinpoint.com.au/hunter-2041

This plan of action is considered to be in the best interest of both residing and non-residing members of the NAC community, as well as the whole local government area.

Planning for growth areas in the right place is nowhere more obvious than in NAC, the settlement chosen and approved by a local council as the location for a new town 100 years ago. NAC subdivision was approved by Stroud Shire Council in 1918. More details on the history of NAC in an article published in the Walter Burley Griffin Society Newsletter, Sep 2019) in **Attachment 1.**

The anomaly and injustice of 'paper subdivisions' in the NSW planning system is even more obvious considering that there has been a continuity of legal framework in NSW since 1901. The principles behind the minimum of private property rights have not changed. More than 3000 undersized lots in North Arm Cove cannot be an anomaly, it is rather that the zoning of those lots is wrong. Application of rural zoning to the area planned and approved as urban is not valid.

The first stage of Griffin's plans for NAC (known at the time as 'Port Stephens City') has already been developed in the form of existing 150+ dwellings. Erroneous application of Standard Instrument LEP zone, RU5 Village, is evident in the zoning of these existing houses in North Arm Cove. RU5 is 'a flexible zone for centres where a mix of residential, retail, business, industrial and other compatible land uses may be provided to service the local rural community'². RU5 is the equivalent of a town centre to a smaller scale settlement. In the case of NAC, there is only a centre zoned area, without any other central use built (no commercial, no facilities) and without a town itself.

It is not contributing to the integrity of the planning system to continuously impose mostly unjust and arbitrary development restrictions for paper subdivisions. *NSW Government Planning for Paper Subdivision Guidance (2013)* published by NSW Department of Planning and Environment (then NSW Department of Planning & Infrastructure) is only a small step towards resolving the issues with NAC 'non-urban land'. State Government and Councils should pro-actively work with 'non-urban land' and 'urban land' communities to progress towards the fair and just resolution of this issue.

The lack of reticulated water or sewerage services do not present obstacle to further development of NAC anymore. The innovative, off-grid technology is available and already has been built in places around Australia (e.g. NSW, Hunter Region, Central Coast) and overseas. The new ways of providing infrastructure in residential development is supported by innovative ways of funding and private providers schemes

The big ideas published in the draft RP that are directly relevant to reinstatement of dwelling entitlement in affected parts of North Arm Cove are:

- A new approach to how we sequence planning for new land uses and infrastructure to accelerate proposals that will support the vision and bring even greater public value.
- A focus on creating a region made up of 15-minute mixed-use neighbourhoods in various contexts as a response to the new ways people live and work in light of the COVID-10 pandemic, including the value people place on local, vibrant, neighbourhoods where most needs can be met within a 15-minute walk, bike or drive if you are in a rural area.
- Reinforcing the importance of equity so that people have greater choice in where and how they live, how they travel and where and how they work. (pg.11)

² DPIE, LEP Practice Note, PN 11-002, https://www.planning.nsw.gov.au/-/media/Files/DPE/Practice-notes/preparing-LEPs-using-the-standard-instrument-standard-zones-2011-03-10.pdf

MidCoast Council Local Strategic Planning Statement (LSPS) does not include NAC as area of growth. On the contrary, the Council in their draft Rural Strategy (public exhibition closed end of Feb 2022) proposed that the land in North Arm Cove, under paper subdivision should be rezoned from Rural (RU2) to Environmental (E2 or E3) without any justification or merit.

The draft RP map of land uses (pg. 13) reveals that the land in and around North Arm Cove are identified as 'Production' or 'Residential'. There is no evidence-based decision for council's proposal to rezone land from RU2 Rural Landscape to E2 Environmental Conservation or E3 Environmental Management. NAC should be included as one of the Hunter Regional Plan Significant Growth Areas, listed in draft RP on pg. 20.

In line with Objective 3 of the draft RP, NAC should be developed as a 15-minute mixed, multi-modal, inclusive, and vibrant local community making a 30-minute connected community with Tea Gardens/Hawks Nest, Karuah, or Nelson Bay (ferry). The original subdivision created fine-grained urban morphology that has not prioritised cars. The walkthroughs within the blocks of individual lots, parks and open spaces, and access to waterfront have been created to facilitate walking and cycling.

Draft RP (pg. 33) advocates for the implementation of the 15-minute concept within existing towns and villages, and within rural areas. The aspiration will be to achieve a mix of local supporting uses within such context, supported by density and variety of housing types. Rural town and villages should aspire to represent 15-minute neighbourhoods, so that people nearby need only travel to one place for most of their everyday needs. At this point in time there is no diversity of contexts, no development such as commercial, retail, amenities, services or similar in NAC. The table on page. 33 of the draft RP should include North Arm Cove as 'Incomplete towns/villages' like Karuah.

Already sustainable, the existing historical subdivision pattern of North Arm Cove can provide for diverse housing and sequenced development as well as for 'nimble neighbourhoods' described in Objective 4 of the draft RP. More housing would reduce the upward pressure on house prices. It would also align with aims and objectives of the NSW Housing Strategy 2041³.

Draft RP on pg. 37 notes that 'Smart and strategic new housing construction is fundamental to the Hunter's economic, social and environmental success. The right house-building contributes to the region's economy, generates employment and provides the kind of homes that can sustain and enhance 15-minute neighbourhoods, and the many other objectives of this plan'. North Arm Cove should be identified as one of the potential future growth areas in the draft RP, Figure 2 (pg. 40).

Development of North Arm Cove 'non-urban land' would support the aim of the Council's Housing Strategy and NSW Housing Strategy 2041 which is to provide housing supply, choice, and diversity in the MidCoast council area. The proposed major release areas of Brimbin and North Tuncurry will provide housing supply to the northern area only. Allowing development of North Arm Cove 'non-urban land' will provide some housing supply in the southern areas of the LGA, complementary to the development at Williamtown Special Activation Precinct.

The release of North Arm Cove and removal of dwelling prohibition is compliant with Objective 4 of the Draft Regional Plan 2041 which plans for 'nimble neighbourhood's, diverse and accessible housing

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³ https://www.planning.nsw.gov.au/Policy-and-Legislation/Housing/A-Housing-Strategy-for-NSW

and sequenced development. Development of NAC will provide a greater diversity of housing and improve housing affordability (the existing lot sizes vary from approx. 350m2 – 1,000m2).

Draft RP (Objective 4, pg. 37) set out requirements for housing development in the Hunter. Amongst the ones listed is the need to avoid further expansion into areas of natural hazard. Most of the historical subdivision in NAC has NOT been identified as the land that would be affected by coastal flooding resulting from climate change, unlike the significant portion of land in Tea Gardens and Hawks Nest (see Figure 1 below). In light of this information, the strategic planning for the south part of MidCoast Council should be reviewed, and revised Urban Development Program should include North Arm Cove rather than other, hazard prone areas in this area.

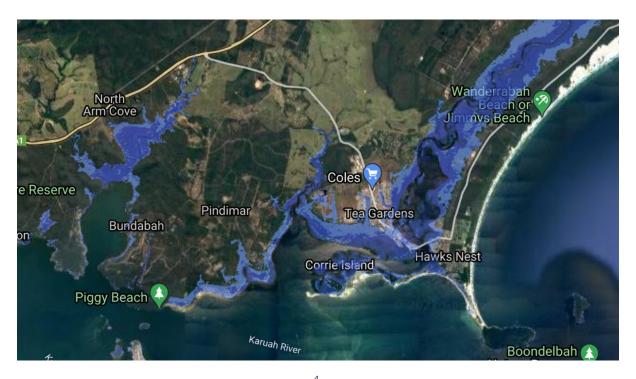


Figure 1: Predicted Inundation Scenario, Highest Tide in 2100⁴

The Hunter Regional Plan 2036 identifies the priority to 'ensure growth is serviced by enabling and supporting infrastructure'. MidCoast Council persistently refuses to recognise that there are numerous ways to provide infrastructure in innovative, off grid and more sustainable ways that differs from the traditional networks. Council's strategic planning work does not reflect the NSW Government policy on Smart Places, draft Design and Place State Environmental Planning Policy 2021 or State integrated water management plan.

NAC has easy access to the M1 Pacific Motorway which makes it connected to centres such as Williamstown, Lower Hunter, or Newcastle. The new technologies and solutions for the provision of water, electricity and treatment of sewage will provide 'enabling and supporting infrastructure' for NAC.

⁴ https://www.coastalrisk.com.au/viewer, assessed 12 Jan 2022. The site is maintained by the CSIRO, Geoscience Australia and the National Estuaries Network with contributions from many others.

Neither The Hunter Regional Plan 2036 (Figure 3 and Figure 10 – Proposed Biodiversity Corridors) nor draft Regional Plan 2041 identify NAC as the land affected by Biodiversity Corridor or National Park and Reserve/State Forest.

A heritage assessment study is required to be undertaken to confirm the State and National significance of the North Arm Cove subdivision created by Walter Burley Griffin, world renowned urban planner and architect who left considerable legacy in Australia. The only way to conserve Griffin's work in North Arm Cove is to allow settlement built with the original subdivision and his urban design principles which are very closely related to the First Nation relation with Country. There is evidence that W.B Griffin liaised with the local Aboriginal population when assessing the site at North Arm Cove. He was impressed with their connection with the land and nature, as documented in the Memoirs of Marion Mahony Griffin, Walter's wife, titled Magic of America⁵:

The location of the eastern port of Australia as New York is the Eastern Port of the United States. Like New York, Port Stephens has sea level entrance to the interior of the continent. It is in close contact with vital mineral supplies and Newcastle is an already established industrial center near by...

During that first year in Australia Griffin advised clients of the nature of this district between Sydney and Brisbane and they purchased this strategic promontory. He designed the city. It was surveyed, the allotments staked out and the whole was sold from the plan in the Sydney real estate office. This meant contour surveys were made in the course of which he became personally acquainted with Aboriginals.

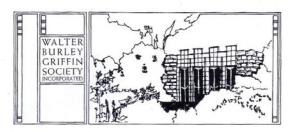
Port Stephens as the natural Eastern Continental Sea Port of Australia can stand as the keystone for metropolitan, urban, suburban and rural development or Australia for some time to come—as a pattern.



-

⁵ https://archive.artic.edu/magicofamerica/, assessed Jan 2022

ATTACHMENT 1



News Update 72

September 2019

PORT STEPHENS CITY

North Arm Cove village of around 450 people lies 200kms north of Sydney on a northern shore of Port Stephens in the Mid North Coast area of NSW. The possibility of railway extension into the region mooted by the 1911 NSW Royal Commission as to Decentralisation in Railway Transit excited many observers including land developers (Fraser 2002:19). The area was considered as a possible site for the national capital before Canberra was chosen.

Although losing out to Canberra for the prestige of being a national capital, the site was still intended to be developed for another new major city and the New South Wales seaport – 'the New York of Australia'. While still working on the Canberra design project, Walter Burley Griffin was commissioned by Austin Chapman's company 'Land Limited' to prepare the masterplan for this site. The plan, centred on the area occupied by present day North Arm Cove village, was approved by resolution passed at a meeting of Stroud Shire Council held on 6th May 1918 (Figure 1). The future urban settlement was given the name of Port Stephens City.

Marion Mahony Griffin credited her husband with the identification of the locality as one of only two 'natural seaports' in Australia. She wrote that 'in his innocence he interested a client, who was carrying on a considerable real estate business, in the opportunity offered at Port Stephens ... It was surveyed and staked out and the allotments rapidly sold'.

In Marion's opinion, the ultimate failure of Port Stephens City lay with the unimaginative foolishness of government bureaucracy in matters of regional and national development, as well as the limitation, in law, of the building and operation of railways by private enterprise: 'If the railroads had not been nationally owned, the settlement of Port Stephens would have taken place long ago'.

Unlike the previously made plans for octagonally shaped Canberra or Griffith (1914), Port Stephens City was designed to fit into the narrow finger shaped bay peninsula. It provided for various urban city functions grouped into precincts or urban zones. The major railways and rail-water interchange (the port) was planned on the western side of the peninsula, towards the Carrington village, with nearby Custom House and Administration Centre occupying the land to the East of the rail and port links. Adjacent to the north of this governance district the land was reserved for Commercial Centre and Factory District forming an employment zone of the future city. Further North there was a retail district lining the main Boulevard with Markets square and a Wholesale district conveniently located to the east of the main railway station. A Residence District was planned to the North towards the old Pacific Highway. Within the

residential zone Griffin had also reserved 3 large lots for two primary schools and one high school, a church site, 2 theatre sites, library centre and public recreation reserve.

Resembling Griffin's later urbanistic work at Castlecrag (Sydney) in 1921, the subdivision pattern of Port Stephens City reveals roads that follow the topographic contours of the peninsula. The main avenue (present day The Ridgway) runs north south, along the top of the ridge and ends at the intersection where a triangular traffic island was planned for (Figure 2). The black rectangle drawn in line with the avenue indicated the position of the landmark City Hall building. Knowing Griffin's work at other locations in Australia, it can be assumed that the open space, green islands scattered around the settlement would be planted with native vegetation.

The plan aimed to provide spatial connectedness between various city zones with parks and bushland reserves peppered throughout the settlement. The foreshore is kept as public open space, accessible to all residents, while the most southern tip of the peninsula is marked as Oversea Gate. It was probably an access for passenger vessels to the City, encircled on the original plan and linked to the rail interchange connecting other commercial wharves (Sea Gate and Harbour Gate) along the waterfront. Recognisable in this plan are also Griffin's attention to walkable neighbourhoods with irregularly shaped green public walkthroughs running at the back of two row of houses in residential blocks.

The subdivision and sale of lots commenced in 1918, the outline of which can still be seen from the air today (Port Stephens Council 2019)(Figure 3).

In early 1919 'Land Limited' went into liquidation and ownership of the subdivision passed to Henry Ferdinand Halloran (1869–1953), land developer and surveyor. Halloran known as the 'builder of dreams' was successful in "interlinking the worlds of planning and private land development and achieving such thorough vertical integration of the design, development and promotion of his estates" (Freestone & Nicholls 2010:05.2). Halloran amended the original plan, by adding an area at least as large to its north. He also converted some open public space from the waterfront into more private lots which increased the number of parcels to more than 4000 (Figure 4).

Peter Harrison, Australian town planner and a champion of the Griffin Plan for Canberra, described the Griffin section as 'one of his most elegant essays in site planning'(Harrison 1995:58). Halloran's extension expressed his dramatic wheelspoke style rather than the more sensuous Griffin mix of grid and curvilinear planning (Freestone & Nichols 2010: 05.11).



Figure 1: The plan was signed off by Walter Burley Griffin, Landscape Architect and H. Sheaffe, Surveyor and Architect. NSW Stroud Shire Council & Land Ltd (1918). Plan showing 10 feet contours, Land Ltd's estate, Port Stephens. National Library of Australia

The city never eventuated. In 1924, the State Government decided that only Newcastle was to be developed as a port and not Port Stephens, ending all speculation in the area (Russell 2016:25).

In 1963, the then Great Lakes Council closed most of the roads planned in Griffin's subdivision, setting aside a small area for residential development, while the rest of the area was proclaimed to be non-urban.

Today, most of the land planned for Port Stephens City by Griffin is zoned RU2 Rural Landscape without dwelling entitlements tlandowners have no rights to build a house on their land – Figure 6). Within the existing NSW planning system, the land is classified as 'paper subdivisions' which means that it consists of lots that have recognition only on paper, have no built roads nor other urban infrastructure.

Castlecrag neighbourhood in Sydney with its urbanistic uniqueness and beauty is a garden suburb of world significance. At the time it was "a new vision of suburbia – one that celebrated the natural Australian environment rather than being embarrassed by its non-Europeanness" (Watson 2015; vi). The one hundred-and-one-year old Griffin plan for Port Stephens City has not lost any of its relevance for modern sustainable living in harmony with nature. Long forgotten and disregarded plans can be modified to resurrect another wonder of the modern urbanism. A village could be built with tucked away houses orientated towards views rather than aligned with street frontages, no fencing among the reserves and kerbless street. Griffin's 'poetry' of the gum trees and architecture that appeals directly to the soul could be brought to life with the adoption of proper development standards and heritage conservation controls for the village.

The Gooreenggai on Baromee Hill, in the middle of North Arm Cove peninsula, has been registered as an item in the State Heritage Inventory. In pre-1788 times, Gooreenggai was used for male initiation ceremonies. Today, it covers approximately 5.35ha and remains an important place for local Aboriginal people. The Griffin plan reserved the area for the government administrative centre with 2 free standing buildings within the kidney shape open space. Halloran's plan marked the same area as 'site for park' which makes existing subdivision pattern suitable for protection of this important heritage site.

North Arm Cove will not rival Canberra, rather, if built, it will be an opportunity to preserve Griffin's legacy and prove that ingenious urban plans do not lose their value and human dimensions over time. Griffin's ideas of a habitat with specific environmental, spiritual and social qualities reflect aspirations of contemporary Australia.



Figure 4: Henry F. Halloran & Co amended plans for Port Stephens City subdivision, National Library of Australia, accessed May 2019, http://nla.gov.au/nla.obj-231550750/view



Figure 3: Google Satellite view of todays' North Arm Cove (formerly Port Stephen City)

"As the world grapples today with the problems of climate change, unsustainable urban growth, social alienation and the despoilment of nature, the Griffins' visionary convictions and their expression through the legacy of the Griffin heritage, are of even greater consequence than in their own time" (Watson, 2015: 18).

ENDNOTES

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Tatjana Djuric-Simovic

noreply@feedback.planningportal nsw.gov au DPE PSVC Hunter Mailbox From:

To:

Subject: Webform submission from: Draft Hunter Regional Plan 2041

Date: Friday, 4 March 2022 5:46:27 PM

Attachments: 20220304 submission-draft-hunter-regional-plan-tds.pdf

Submitted on Fri, 04/03/2022 - 17:44

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name



I would like my submission to remain confidential

Info

Suburb/Town & Postcode

North Arm Cove NSW 2324

Please provide your view on the project

I object to it

Submission file

20220304 submission-draft-hunter-regional-plan-tds.pdf

Submission

I am the owner of the land in Nor h Arm Cove, MidCoast LGA. I propose hat North Arm Cove is included as a location for future urban growth. The rationale and jus ification are presented in the attached document.

Thank you

I agree to the above statement



4 March 2022

COPRAD Pty Limited ABN: 43 108 573 935 PO Box 358, Kiama NSW 2533 www.coprad.com.au

Department of Planning & Environment

PO Box 1226 Newcastle NSW 2300

By website upload: https://www.planningportal.nsw.gov.au/draft-hunter-regional-plan-2041

To the Department of Planning & Environment,

Re: Submission to Draft Hunter Regional Plan 2041

Thank you for the opportunity to provide a submission to the *draft Hunter Regional Plan 2041* (**Draft Plan**) and to attend a workshop. This submission to the NSW Department of Planning & Environment (**DPE**) is on behalf of MPT Farms, the landowner of 967 Wingham Road, Wingham (**Property**), also known as Lot 11 in DP1240421.

The purpose of this submission is to:

- 1. Submit the Property for inclusion as an investigation area in the Barrington region; and
- 2. Request that the Draft Plan be clear on the required planning pathway for the rezoning of properties not identified within the Draft Plan.

This submission details the site-specific and strategic merit of the Property for further investigation as an urban growth area including existing site features, economic analysis, infrastructure requirements and inclusion within strategic framework documents. Further detail is then provided specific to the Draft Plan and future planning implications.

Wingham

Wingham is the oldest town on the Barrington Coast and has retains a remarkable history of heritage buildings listed on the National, State and Local registers as well primary industries including timber, dairy and beef. The town hosts Wingham Brush Nature Reserve, museums, scenic beauty from open space and the Manning River, and hosts a strong tourism trade from reputable cafes, various events and fresh food markets.

Wingham is identified as a Rural Centre in the MidCoast Local Strategic Planning Statement (**LSPS**) and has been the subject of various upgrades by MidCoast Council (**Council**) with further works planned following the recent approval of the Wingham CBD streetscape concept plan. An aerial of Wingham is provided in Figure 1 with land zoned B2 Local Centre outlined in blue and the Property outlined in green.



Figure 1: Aerial of Wingham (original image sourced from Google maps)

Despite the existing and increasing attractiveness of Wingham as a location to reside, it has experienced minimal population growth due to a severe lack of quality housing releases over the past three decades. In consultation with Council, COPRAD prepared a 'Wingham Residential Land Supply Assessment' in July 2018 which undertook detailed analysis of existing supply of zoned residential land as well as recent releases. To analyse the Wingham market more comprehensively, MacroPlan, which as a strong understanding of the LGA based on previous works for Council, prepared a Demand Assessment in February 2020. Conclusions of the assessments included:

- Limited supply has been released to the market in Wingham in recent years, particularly that which is of high amenity and is well-located.
- There are major supply constraints due to monopolistic land ownership with one landowner controls over 80% of the land likely to provide housing supply to Wingham.
- In the three years to issue of the MacroPlan report, the median house price in Wingham increased 26.4% compared to 12.2% in the MidCoast LGA, representing an undersupply and latent demand for residential properties.
- The Wingham rental market was extremely tight with vacancy at just 1.0% in July 2019 and the median asking rental for a 3-bedroom house increasing 14.0% in the prior three years demonstrating strong demand for residential properties in Wingham.
- Wingham has a self-sufficiency rate of 44.6% meaning that over half the workforce live outside Wingham (this compares to the MidCoast LGA which has a 94.7% self-sufficiency rate). When considered with the high level of constraints to acquire new property, this demonstrates further demand for housing.
- Despite the above, Wingham experienced population decline of 20 people over the eight-year period from 2010 to 2018.

The high demand for quality accommodation in Wingham is evident however without corresponding supply, there has been no opportunity for growth. Stifled population growth in Wingham has been misconceived as low demand for years on end resulting in neglect for new urban growth opportunities when the actual problem has been the cause of low population growth – constrained supply.

Our concerns with the urban land monitor exhibited by Council with the draft Housing Strategy is that the lack of population growth is recognised but the investigation does not dig any deeper to determine the cause. We have collected letters from local real estate agencies, builders and the Chamber of Commerce which support a new high quality masterplanned community in Wingham, noting the existing shortage of supply. We strongly support the Draft Plan's position of Urban development program (quoted below) but emphasise that the evidence needs to be more considered than simply relying on historical population growth data.

"Better coordination begins with a strong evidence base. Regular monitoring of land supply, dwelling production and demand will enable better decisions on urban renewal priorities, release of land for development and the infrastructure and servicing required to enable delivery."

There has been a recent trend of decentralisation of the population from major centres to regional areas coupled with higher retention of population of regional areas. We accept the general trend of population growth gravitating to coastal areas rather than inland however we consider Wingham to be an exception. Coastal areas have been far too heavily relied upon for the provision of new housing supply and 'tree change' movement has been given little consideration in comparison to that of the 'sea change'.

The DPE Interactive map associated with the Draft Plan includes commentary for Wingham of "Housing diversity and sequenced development" with an intention "to deliver new and more complete communities that are well-planned and serviced" however we are unclear from review of the Draft Plan how this is to be implemented.

967 Wingham Road, Wingham

The 63.5-hectare 'Property' zoned RU1 Primary Production is largely cleared of vegetation and the topography slopes gently downward towards Cedar Party Creek to the north and east. As can be observed from Figure 1, the Property is in proximity to the Wingham town centre just 300 metres away at the closest point offering high accessibility and connectivity with the established town.

The Property benefits from extensive frontage to Wingham Road generally along the south and all major services are located within or adjacent to the Property and are understood to have sufficient capacity to service future development. We agree with the concept outlined in the Regional housing benchmarks of the Draft Plan that acknowledges "the greater the savings in public infrastructure spending" associated with infill development however specific to the Property, significant public spending is not anticipated.

The MidCoast Settlement Expansion and Redevelopment Opportunities Analysis Report (**Growth Areas Report**) assesses the constraints of the Property to be "LOW" which combined with ease of access to existing amenities and infrastructure provide the Property with very strong site-specific merit.

In relation to strategic merit, the Property has been earmarked for urban growth for over 15 years having been first identified for Proposed Future Urban Release Area in the *Mid North Coast Regional Strategy 2006-2031*. More recently, part of the Property has been identified for urban growth in the MidCoast draft Housing Strategy (denoted by '3' in Figure 2 below) and the Growth Areas Report in 2021 recommended the Property to "be nominated as an Urban Release Area to be rezoned in the Medium-Term (6-10 years) to provide low density residential development, subject to a Planning Proposal".

The MidCoast LSPS did not map growth area properties however this omission is addressed by the Growth Areas Report, subject to DPE's adoption.



Figure 2: 'Wingham' (MidCoast Council draft Housing Strategy, January 2020)

A letter from Minister Stokes, the then Minister for Planning & Open Spaces, dated 28 April 2020 (**2020 Letter**) observed that the Property is not identified as an urban release area in the Hunter Regional Plan 2036 seemingly implying that accordingly, the Property could not be supported for rezoning.

The letter goes on to suggest that the Property is not identified in the MidCoast draft Housing Strategy "as part of a future urban release area" which is clearly incorrect based on Figure 2. We note that the same address (967 Wingham Road) is applied to two different properties being Lot 11 DP1240421 (the Property) and also Lot 10

DP1264398 which is on the other side of Wingham Road to the Property. On reflection we query whether the incorrect property was considered in preparation of the 2020 Letter.

We are informed that in recent years, DPE has been hugely reluctant to consider planning proposals within the Manning Valley, at least in part due to the misconception that the new town of Brimbin will provide residential supply. This neglect of Wingham in particular has been hugely damaging to the local economy with the only recent rezoning in recent years being an infill site that with respect, is not well-located and will not provide the high-quality outcome that pent up demand is seeking.

MPT Farms' vision for the Property is consistent the Draft Plan in that it would provide a rural diversification to the growth concentrated in coastal areas and would greatly improve housing choices within Wingham. We envisage a considered masterplanned community with high levels of amenity including access to the Cedar Party Creek and direct access to the town centre of Wingham and nearby facilities such as the Wingham Pool, cafes, shops and the Wingham Central Park.

We understand that the MidCoast Growth Areas Report was submitted to DPE for endorsement and in our view, properties earmarked for investigation as potential growth areas should be included in the final version of the Draft Plan. We note that in the whole of the Barrington region, there is currently only mapping with "investigation areas" for Taree.

We request that DPE include the Property, as well as other properties within the Growth Areas Report, for urban growth consideration within the final Draft Plan.

Draft Hunter Regional Plan 2041

We accept that the Draft Plan intends to identify "regionally significant growth areas and actions" and that as a plan for the largest regional economy in Australia there needs to be a focus on large-scale priorities however there has been a long history of neglect for smaller communities within such frameworks which has limited the ability and interest of councils to progress land use change.

The Draft Plan "draws from each council's local strategic planning statements prepared in accordance with section 3.9 of the EP&A Act. It acknowledges common interests without duplicating aspects of land use planning." As the MidCoast LSPS does not map growth areas, the Draft Plan should capture the urban growth areas of the Growth Areas Report as this will not result in duplication.

Including these properties would provide greater direction for localities within MidCoast and enable growth where it can be demonstrated as appropriate. The Draft Plan asserts to complement local planning strategies which we fully support although note this differs greatly to the circumstances of the past where Council has been willing to support the assessment of planning proposals but has instructed against lodgement on the basis that DPE has continually communicated a resistance to even consider in locations where residential supply is incorrected considered to be sufficient.

The DPE Discussion Paper for 'A new approach to rezonings' (December 2021) provides for a review process where there is a delay or lack of support from a council or where the proponent or Council are dissatisfied with a gateway determination. However there is no mechanism for the scenario that Council acknowledges and supports a planning proposal but DPE refuses to consider which can be on the grounds of lack of regional significance which shows a great disservice to local communities.

Conclusion

Generally we support the Draft Plan and applaud DPE for its direction however we feel strongly that additional consideration needs to be given to smaller centres, and if this is to be the role of local planning statements, then greater detail of how local councils will be empowered needs to be considered.

967 Wingham Road, Wingham (Lot 11 in DP1240421) should be included for investigation to accommodate urban growth based on its extremely strong site-specific merit and long history support within strategic planning frameworks. We are eager to work with Council to "to deliver (a) new and more complete communities that are well-planned and serviced" that meets the expectations of the community, Council and DPE.

We would be happy to meet with DPE to discuss this submission further and thank you for the opportunity to comment. Please do not hesitate to contact me if you have any questions.



From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Friday, 4 March 2022 6:21:16 PM

Attachments: 220304-wr-hunter-regional-plan-submission-to-dpe.pdf

Submitted on Fri, 04/03/2022 - 18:20

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info

Suburb/Town & Postcode

KIAMA 2533

Please provide your view on the project

I am just providing comments

Submission file

220304-wr-hunter-regional-plan-submission-to-dpe.pdf

Submission

Refer attached.

I agree to the above statement

Yes

North Arm Cove Rate Payers Association Inc.

2001397

Phone: 0411344609 Email: <u>nacrpa@gmail.com</u> <u>www.northarmcove.org.au</u>



4 March 2022

SUBMISSION FOR THE DRAFT HUNTER REGIONAL PLAN 2041

Executive Summary

The North Arm Cove Ratepayers Association proposes that the Paper Subdivision land at North Arm Cove be included in the Hunter Regional Plan 2041 and re-zoned to allow the existing subdivision to be developed for residential purposes.

There is pressure on government to release new urban land due to the exodus of people from the cities, affordable housing issues, climate change related policy and opportunities for more sustainable living practices making North Arm an ideal option for the release of the non-urban land.

Only 30 minutes north of Newcastle and adjoining a major arterial road the A1, North Arm Cove's existing 3000+ house-size lot subdivision is a prime location for development, and would also provide much-needed stimulus to Hunter's economy.

So far, all we get is rhetoric from politicians and public servants, but what we need is an authority brave enough to tackle the future problems and actually implement a project that is in line with its own state policies.

The existing State and Local Regional Plans both identify existing coastal areas for land release, but many of them are not as suitable as North Arm Cove.

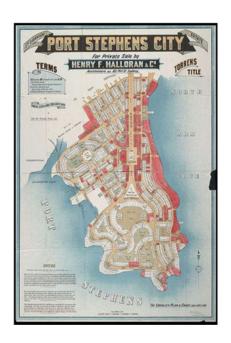
We ask that our submission be seen as providing solutions to the challenges facing our regional communities.

Background

First identified in the early 1900's as an ideal place for a port city, Walter Burley Griffin together with his wife, Marion, designed a city of around 4000 lots which was considered as an option for the capital of Australia. With Canberra chosen as the preferred capital (as it was inland and more secure from naval attack), the Griffin's vision can still be seen in an aerial view today, and also realised with the Castlecrag development in Sydney.

A plan for the subdivision was created and registered in the Land Titles Office and Certificates of Titles were issued. NAC has more than 130 streets and roads.

In the 1950s Council decided to release several hundred lots for residential purposes, but held off on re-zoning the remainder, presumably to allow for further growth before release.



Current Issues affecting Regional Growth

• Migration of population from the cities.

The pandemic has activated behavioural change in society. The Australian Bureau of Statistics has identified a net migration from cities to be around 40,000 annually in the past two years. The ability to work remotely has inspired many to seek a better lifestyle. The majority seeking relocation are heading towards the coast, and the mid-coast of NSW is seeing the result of this migration.

Climate Change

Bushfires, floods, drought and rise in sea-levels are important considerations in future planning documents, with any future land releases viewed in terms of the level of constraints assessed for these factors.

Affordable Housing

The younger generation have been shut out of the property market due to a combination of rising house prices due to low interest rates and easy credit. Solutions are required urgently and the Reserve Bank Governor has highlighted the need for more land releases as a clear solution to the problem. Council owns 1000 lots, so providing affordable housing opportunities for our most vulnerable is something within their remit.

• Regional Communities

Many regional communities do not provide adequate further education or employment opportunities required to keep young adults in their home towns, forcing them to move away. Given MidCoast Council LGA has one of the biggest ageing population, we have an increased need for aged care or similar services. Further, many migrant families are landowners, looking to realise their dream of retiring to North Arm Cove.

Reaching Net Zero

The Australian government have committed to achieving Net Zero by 2050. This will require much higher BASIX conditions and develop a need for 'green' infrastructure. The use of renewables, smart technologies and environmentally sustainable development feature very highly in the vision for the future.

• State Government Initiatives

On the 7th May 2021 the Morrison Government announced a \$66 million project to widen the airport's runways to increase domestic, international travel and freight options, and increase local export opportunities. The intended result: 4,400 full-time jobs, an additional 850,000 visitors to the region and add \$12.7 billion to the local economy over the next 20 years. North Arm Cove is ideally located only 20 minutes from the Newcastle Airport, and could easily house those who have gained employment or looking to visit the area.

Reasons why North Arm Cove should be included in the Hunter Regional Plan 2041

- 1. North Arm Cove has an *existing* subdivision layout and therefore development doesn't need to start from scratch. Initial investigations into the provision of infrastructure such as sewer, stormwater and power show economic viability, and the costs could easily be met by the total individual landowners.
- 2. Paper subdivisions are covered by specific legislation and the pathway to development is clear.
- 3. We are a rare and fantastic opportunity to create a template for future subdivisions which require zero carbon, environmentally sustainable outcomes using innovative technologies.
- 4. MidCoast Council currently owns around 1000 lots which could be used for affordable housing, or many other community benefits, which align perfectly with NSW Government policies and initiatives.
- 5. North Arm Cove is 20 minutes from the Newcastle airport and Williamtown Air-force Precinct, and therefore offers housing options for those that are employed there.
- Constraints such as bushfire, flooding and flora and fauna protection are described as "moderate" in an independent report commissioned by MidCoast Council, which indicates solutions are not significant or insurmountable.
- 7. Land releases have been approved for neighbouring Tea Gardens, however future climate mapping identifies these areas as flood prone and unsuitable. North Arm Cove is NOT in a flood prone area.
- 8. Other land releases identified by MidCoast Council for residential use do not meet the needs of the migrating population, who would rather be closer to Sydney and Newcastle and the coast. Harrington, Old Bar and Diamond Beach are identified for future land release but have minimal land that is suitable. Taree is seen as one of the main areas of land release but it is inland and not as attractive in terms of location. It is also having major social and crime related problems.
- 9. North Arm Cove's proximity to the A1 Highway would be ideal for electric vehicle charging stations and provide additional commerce to the area.
- 10. A new town or village would bring much needed services such as shops, childcare, medical centres, aged care services etc. which enhances the local and surrounding communities of Karuah, Pindimar Tea Gardens and also increasing employment and economic benefits.
- 11. The current zoning of RU2 has created many problems including illegal structures, rubbish dumping, vandalism and shipping containers due to the lack of options for the use of land. It has created an ugly landscape which will only get worse as more landowners try and find uses for their land.
- 12. The fact that land owners have been levied rates from the date of purchase is legally sound but morally corrupt. The zero provision of services in return for significant amounts of rates should form part of a re-zoning objective that makes it fair for all.
- 13. Creating trails for walking and cycling as part of any new development will showcase the importance of integrating with nature which amazingly, was identified by Burley Griffin 100 years ago.

In closing, if the NSW State Government is serious about economic recovery after the pandemic, reaching its environmental mandate on net zero, or addressing future planning and community needs, it should grab North Arm Cove and use it as an example for the rest of Australia, if not the world.

Action, not words!

On behalf of North Arm Cove Rate Payers Association NACPRA From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Friday, 4 March 2022 10:45:34 PM Attachments: hunter-regional-submission.pdf

Submitted on Fri, 04/03/2022 - 22:40

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

Info

Suburb/Town & Postcode

Balmain East

Please provide your view on the project

I am just providing comments

Submission file

hunter-regional-submission.pdf

Submission

Submission from NACRPA is attached

I agree to the above statement

Yes

From: noreply@feedback.planningportal nsw.gov au

To: DPE PSVC Hunter Mailbox

Subject: Webform submission from: Draft Hunter Regional Plan 2041

Date: Friday, 4 March 2022 11:13:16 PM

Submitted on Fri, 04/03/2022 - 23:13

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name



I would like my submission to remain confidential

No

Info

Email

Suburb/Town & Postcode

Hamilton South 2303

Please provide your view on the project

I am just providing comments

Submission

Hunter Regional Plan 2041 - Submission

A submission on the Draft Hunter Regional Plan from the Newcastle Greens Local Government Reference Group **

Background

The Newcastle Greens Local Government Reference Group welcomes the opportunity to update and renew the Hunter Regional Plan 2036. Rapid changes in the economic and environmental conditions that affect our region, and changes in government policy that reflect this, require a review of the current plan.

We are pleased to see new objectives included in the 2040 plan, in particular the move to '15-minute' neighbourhoods as a planning goal for new developments, the need to align all planning with the objective of achieving net zero emissions by 2050, and the recognition that the regional economy is moving quickly away from coal mining as a major industry to a new, green, and more diverse regional economy. We support these new directions and make some sugges ions below about they may be more fully incorporated in the Draft Plan.

Our response is to issues of regional significance or hat are specific to the Greater Newcastle planning area and, in particular, the Newcastle LGA. We have not considered issues specific to the other planning areas.

Making it happen

It is concerning to us that, after outlining nine 'big ideas' about the new draft regional plan, to 'make it happen' we jump straight to an 'urban development program' that will 'ensure a pipeline of land that is available from potential future growth areas, investiga ion areas and zoned and serviced land ready for new homes and jobs'. While we support the provision of sufficient housing and industrial land to support our regional popula ion, the rate and footprint of this outcome can only be considered in the context of the opportunities and constraints presented by the other 'big ideas' such as the 15-minute neighbourhood, achieving net zero emissions, and a focus on green infrastructure, public spaces and nature. Assessing how the aim to continue the supply of land and housing to meet demand will fit with the 'big ideas' is made harder when the draft plan does not provide any clear forecasts of this demand, the likely land requirements, and the distribution across planning districts. This is 'implied' by some of the mapping, for example, but is not clearly set out with expected demand, ime frames etc.

• Recommend: Include a table showing, over time, the forecast population growth, housing requirements, predicted land take assuming a particular mix of infill/greenfield development, employment growth etc... hat the plan is based on.

We note the role of the 'Hunter urban development program committee' (page 17) who will be involved in the implementation and monitoring of the Plan and reporting on its progress. The membership of the committee covers organisations responsible for infrastructure planning and provision, and land planning, and development, including organisations who represent private developers who have a direct interest in the decisions of the committee.

To ensure the committee can fully understand and consider the new 'big ideas' that are now central the plan, to expand the knowledge base, and to improve the transparency and accountability of the committee, its membership should be expanded to include organisations who have specialist knowledge and a regional overview of issues such as a path to zero emissions, First Nations stewardship and ownership of land, social infrastructure requirements to achieve equitable communities, and the need for 'green infrastructure, public spaces and nature'. We will not suggest specific organisations, but we are aware of several who could readily fill these briefs.

• Recommend: Expand the Hunter Urban Development Program Committee to include representative organisa ions with knowledge and regional understanding of issues such as a path to zero emissions, First Nations stewardship and ownership of land, social infrastructure requirements to achieve equitable communi ies, and the need for 'green infrastructure, public spaces and nature'.

The committee's brief includes to 'remove barriers and disincentives for infill housing' and to 'identify opportunities to accelerate the supply of land for housing and employment including improvements to land rezoning, release and servicing'. Similar actions are mentioned elsewhere in he plan. Unfortunately, these outcomes have often been achieved by removing planning and development decisions from local councils, reducing the assessment requirements for new land releases and developments, and 'standardising' housing types and design standards to meet a minimum threshold.

We argue that this approach is counter-productive, especially as we face the new challenges of building zero-emissions climate-resilient communities and local economies. It results in a 'meet minimum requirements' culture for developments, that increases chances of objections and disputes wi h

local au hori ies and communities that can delay rather than accelerate approvals.

Design excellence, innovation, and careful stewardship of the natural environment are essential to achieve the aims of this plan. This can only be achieved by setting high thresholds for land release approvals and then allowing those with the local expertise decide what is the best development for their local landscapes and communities. If his becomes the 'norm' then planning au horities, development assessors, and developers will quickly adapt to he new expectations and standards, and approval times should not be affected.

• Recommend: Measures to 'accelerate' and 'remove barriers to' development and land release should not be at the expense of environmental protections, design excellence, innova ive design and technology for a changing climate, and community engagement in decision making.

Place strategies

We note the inclusion of Williamtown in the place strategies as a 'region shaping gateway and industry precinct'. We raised objections to this during the preparation of the Newcastle Local Strategic Planning Statement. We suggested hat infrastructure, industrial and residential development around Williamtown should be limited due to several constraints:

- o The effect of flooding and rising groundwater and sea levels on low-lying land, services, and transport infrastructure
- o The limits on land use as a result of noise from aircraft and contamina ion by PEAS
- o The likely reduction in mass air travel as carbon budgets limit aircraft use and raise fuel costs
- o The incompatibility of industries based on weapons manufacture and delivery with the aim of a peaceful sustainable society
- o The continuing frictions caused by the dual use of Williamtown as a military and civilian airstrip
- o The limited land suitable for residential development which prevents airport and associated industry workers from living close to their place of employment, increasing travelling times and car dependency

We believe the airport would be better served by a modern, fast, and frequent transport shuttles to key des inations in Newcastle, Port Stephens and the Lower Hunter and that development around he airport should be limited to manufacturing and services that deliver directly to the airbase and airport. More general aviation and aerospace research would be better located close to urban settlements and in one of the industry and innovation catalyst areas identified in the Regional Plan, such as Callaghan.

So, gateway perhaps, but industry precinct no.

• Recommend: Limit development of Williamtown as an industrial and research precinct and direct activities to o her industry and research catalyst areas closer to services and residen ial accommodation such as Callaghan

Objectives

Objective 1: Diversify the Hunter's mining, energy and industrial capacity

Reuse of rehabilitated mining land is flagged as an opportunity for adding new infrastructure, developable land and biodiversity land. However, there is a high level of uncertainty over the successful rehabilita ion of land, the time it will take, and the suitability of rehabilitated land for a particular land use. This is particularly problematic with land for future agriculture and biodiversity uses, as it is easy to say loss of these current land uses to urban development will be 'offset' by future by gains of rehabilitated mining land.

- Recommend: Mining sites and infrastructure should be repurposed to support new and emerging industries where possible, but mining land should not be included in calcula ions of land available for future land uses until such times as the completion or near-completion of successful rehabilitation. New infrastructure and industries are required to diversify our economy and respond to the climate crisis and achieve net zero emissions by 2050. This provides opportuni ies for new industries in the Hunter that capitalise on our energy infrastructure and expertise and our excellent port facilities. They will provide employment and export opportunities for those workers and businesses such as coal miners who will be affected as we transition from fossil fuels. These opportunities will pose planning requirements that should be incorporated, or at least acknowledged, in this plan. They include: o Infrastructure such as shore support and transmission lines for offshore wind farms
- o Manufacturing, construction and maintenance services for wind and solar generators, electricity storage facilities, and green hydrogen production and transport
- o Identifying and protecting land that may be required for local-scale pumped hydro $\,$
- o Identifying the land use and infrastructure needs of the emerging green hydrogen industry

The NSW and Federal Governments are investing significantly to establish the Hunter as a renewable energy zone and hydrogen hub, along with hundreds of millions in private investment, and the Regional Plan should make sure we are ready and able to benefit from this opportunity.

• Recommend: The Regional Plan should include specific reference to emerging industries such as solar electricity generation and storage, offshore wind generation and green hydrogen and identify and accommodate their land use and infrastructure needs in the plan (or set up a process to do so in the near future).

Objective 2: Ensure economic self-determination for Aboriginal communities

Empowerment and control over decisions that affect people and their communities is at the core of self-determination – economic and otherwise. As a minimum, Aboriginal communities need to be given a place on the committees that are tasked with implementing and reporting on this plan and the ac ions in it.

Objective 3: Create a 15-minute region made up of mixed, multi-modal, inclusive and vibrant local communities

We are excited to see the Regional Plan adopt a goal of '15-minute' neighbourhoods and '30-minute communities'. The provision of cycling and all-ability walking access to neighbourhood shops, services, and public spaces will presumably become a design and development requirement for all new urban release areas.

However, he retrofitting of existing urban areas to achieve this is not so easy and, as 60%-80% of planned new development is in-fill, ways will have to be found to ensure his is achieved through developer levies, design requirements and direct public investment. This would fund construction of continuous bike networks in existing city and suburban area, upgrading of neighbourhood facilities to support a wider range of services, and improvement in the quality and extent of neighbourhood public spaces.

• Recommend: All zoning changes allowing in-fill development in existing urban areas should be accompanied by a comprehensive assessment of the goods, services and leisure needs of the new residents and their neighbourhood access to these, and a plan (including estimated costs) of ensuring these services are accessible via safe all-abili ies pedestrian pathways and dedicated cycleways. Who is responsible for preparing, paying for and implementing these plans may depend on the type, scale and loca ion of the release area or development.

Public transport is a key element of moving people away from car-dependency and providing 30-minute connections between larger centres that provide specialist services such as medical, higher education and legal facili ies. While buses will continue to be the mainstay of public transport around the region, the existing rail network plays an important role, and the expansion of the urban footprint and densifica ion of exis ing settlements offers the opportunity to expand and improve the rail network.

Our industries also depend on he rail network for freight transport, particularly in and out of the Port of Newcas le. Whether using fossil fuels or electricity, rail is a much more energy efficient way of transport that cars, trucks and buses, so will be important in achieving net-zero emissions. Improved suburban services would also open new opportunities to develop in-fill precincts around railway stations.

- Recommend: The Regional Plan should include actions to improve the existing rail network and iden ify potential needs and opportunities to extend it. Our suggestions include:
- o Upgrading the inter-city line to provide a 90-minute Sydney-Newcastle journey and a sub-2hr journey to Maitland
- o Electrifying all lines, particularly passenger lines, in he Hunter
- o Introducing metro-style and/or light-rail suburban services in the greater Newcastle area with fast and frequent services covering, say, Morisset to Maitland
- o Improving the frequency and standard of services on the Dungog and Singleton lines
- o Implementing the dedicated Sydney-Brisbane freight line by-pass and develop plans to service the 'National Pinch Point' areas around Black Hill and link it to a dedicated port-side line that takes freight off the suburban Newcastle network

- o Complete he construction of the Glendale interchange
- o Identify and protect rail corridors hat may support future extensions to he Lower Hunter Rail network especially in suburban growth areas such as Cessnock, Branxton, Minmi, Glendale and west Lake Macquarie

Objective 4: Plan for 'Nimble Neighbourhoods', diverse housing and sequenced development

Diverse housing should mean all new developments include a range of housing types, affordable and social housing, more sustainable housing designs, and houses with smaller footprints. However, the strategies in the plan do not provide any clear mechanisms or pathways to achieve these outcomes. If left to the market, the majority of new housing on greenfield sites will be single-storey bungalows at a price suitable for working couples, or retirement villages for over 55s. In both the new development areas and in-fill developments interventions in the market are required if the plan is to achieve a diversity of housing types and uses.

There are plenty of examples of such market interven ions such as government subsidies and developer levies, direct purchase by government and non-profits, and mandated provision as a condition of consent.

However it is achieved, we suggest there should be a minimum provision of 30% of new dwellings for affordable, special-needs and permanent social housing. This housing should be integrated across he development to prevent concentrations of disadvantage but should be situated close to public transport and services.

• Recommend: That all approvals for new estates and urban up-zonings include a provision for the supply of social, affordable and special needs housing. Social housing should be owned by government or non-profit agencies for that sole purpose. The plan should make estimates of the demand and provision for these types of housing in planning districts up to 2040.

Objective 5: Increase green infrastructure and quality public spaces and improve the natural environment

Urban greening is restricted by, among other things, the tendency for new and infill housing to have an increased footprint on their site, making it difficult to support large trees or on-site water infiltration. We suggest there should be a 'Basix' type requirement for some minimum vegetation and shade cover for all new buildings which, in infill development could include green roofs and walls or street setbacks to allow greater street canopy, and in new developments could include a ratio of canopy cover to building footprint or roof area across the whole estate or on individual sites. We note that one western Sydney Council has introduced a requirement of a large mature tree per building on a new estate.

The current focus in the plan is for urban shading and canopy to be provided in public places and infrastructure. However, with 60% or more of land in towns and suburbs in private ownership, these requirements must also apply to private land to reduce energy use for cooling and prevent urban heat island effects.

• Recommend: That a planning or development requirement be introduced through Basix or other suitable mechanism for all new developments to provide a minimum level of canopy or green cover.

Improving the natural environment is, of course, best achieved by preventing any further loss of natural areas from encroachment and clearing for development. This is especially true in areas such as Greater Newcastle that have already lost nearly all of their natural areas and what remains is mostly small, isolated remnants.

In par icular, natural waterways and their riparian zones, wetlands, and the immediate coastal zone should all be protected from development. The Watagans to Stockton link, first proposed in the 1970's as a biodiversity corridor and identified for protection in previous regional plans is under serious threat from developments that have cleared bushland around Minmi and Black Hill, and from proposed new rail and road construction along the M1 corridor. What remains of this corridor needs to be protected if it is to retain any value as a functioning biodiversity corridor.

• Recommend: The remaining land in he Watagans to Stockton corridor such as Stockrington Valley, he western margins of Hexham Swamp, and the Tomago riverfront should be added to the reserve system and key private land in the corridor needs to be permanently zoned for environmental protection to prevent further biodiversity losses.

Objective 6: Reach net zero and increase resilience and sustainable infrastructure

Given 'the regional plan seeks to make climate change a guiding principle for all planning decisions' this section is inadequate, only dealing with natural hazards, air quality and car use. There are elements of net zero and climate change adaptation incorporated in the other objectives, but in general the plan is 'business as usual' – identifying and providing suitable infrastructure and services to allow release of new land for industry and suburban housing.

We have already made suggestions above for how the plan can help achieve net zero or adapt to changing economic and climate conditions. It is not possible to re-write the whole plan to properly 'make climate change a guiding principle', so we will provide one example of how 'business as usual' fails this objec ive.

A new estate, house or apartment block built today has a useful asset life of about 100 years and may undergo a significant upgrade once or twice in that time. That means that to be 'zero emissions' by 2050, new estates and new buildings need to be zero emissions today, as they are unlikely to be replaced or significantly modified over the next 25 years. Does this plan consider this? Not thoroughly. To make 'climate change a guiding principle', this plan would ensure that proposed new release and infill development areas are designed and situated to:

- Remain safe and liveable during extended periods of above 40-degree temperatures
- Use building materials that have minimal embodied carbon emissions and that can be readily recycled and reused
- Take advantage of their natural settings such as shade, aspect, slope, vegetation, and si ing to reduce energy requirements and exposure to natural hazards
- End reliance on fossil fuels for heating, cooling, cooking and transport
- Be adapted to suit different occupation requirements such as extended families or people with limited mobility
- Anticipate and be easily adapted to accommodate zero-emissions technologies such as solar access for panels, heat-pump hot water systems, and charging stations for electric vehicles
- Use paving materials for roads and public spaces that reflect heat and allow water infiltration

This list provides some examples of the requirements for a truly zero emissions and climate change adapted development model for housing and industrial estates. Achieving this is made difficult by the 'exempt and complying' development provisions hat approve most dwellings providing they meet certain minimum requirements. These approval thresholds could be raised by improving building standards, si ing requirements and Basix requirements. While the Regional Plan is 'big picture' and does not do detail well, it must recognise that without these sorts of attention to detail in the approval process it cannot achieve net zero or adapt to climate changes and, in fact, it may well make things worse.

- Recommend: The Regional Plan make reference to the need for a review of building standards and Basix requirements if they are to achieve net zero and climate adaptability for new developments
- Recommend: New developments will not require connection to gas supply

Objective 7: Plan for businesses and services at the heart of healthy, prosperous and innovative communities

Objective 8: Build an interconnected and globally focussed Hunter

See previous comments re rail infrastructure and defence precinct at Williamtown.

District planning and growth areas

Greater Newcastle

Our response on many issues relevant to Greater Newcastle are included in earlier comments including he Williamtown defence precinct, the urban and freight rail network, the western biodiversity corridor, and development standards for infill development.

We would add:

• Recommend: Planning for the Broadmeadow catalyst area includes 'Hunter Park', the Broadmeadow railway yards and the 9-ways and Brunker Road precinct and be done as an integrated plan involving NSW and local governments, community and business stakeholders, and local residents.

- Recommend: A study be undertaken to identify industrial and other sites, such as the Wickham fuel depot and Carrington coal loader, that may be rehabilitated or moved to facilitate urban consolidation and new industries and, if necessary, schemes such as the grouting scheme be considered to rehabilitate sites to make them suitable for urban development.
- Recommend: Place Delivery Groups include members from effected or adjacent communities, local Land Councils, and independent planning and climate change experts.
- ** The Newcastle Greens Local Government Reference Group is a group of Newcastle Greens members delegated to consider, discuss and comment on issues relating to local government in the Newcastle LGA.

For all correspondence contact

, Convenor of the Newcastle Greens Local Government Reference Group

Hunter Regional Plan 2041 - Submission

A submission on the Draft Hunter Regional Plan from the Newcastle Greens Local Government Reference Group **

Background

The Newcastle Greens Local Government Reference Group welcomes the opportunity to update and renew the Hunter Regional Plan 2036. Rapid changes in the economic and environmental conditions that affect our region, and changes in government policy that reflect this, require a review of the current plan.

We are pleased to see new objectives included in the 2040 plan, in particular the move to '15-minute' neighbourhoods as a planning goal for new developments, the need to align all planning with the objective of achieving net zero emissions by 2050, and the recognition that the regional economy is moving quickly away from coal mining as a major industry to a new, green, and more diverse regional economy. We support these new directions and make some sugges ions below about they may be more fully incorporated in the Draft Plan.

Our response is to issues of regional significance or hat are specific to the Greater Newcastle planning area and, in particular, the Newcastle LGA. We have not considered issues specific to the other planning areas.

Making it happen

It is concerning to us that, after outlining nine 'big ideas' about the new draft regional plan, to 'make it happen' we jump straight to an 'urban development program' that will 'ensure a pipeline of land that is available from potential future growth areas, investiga ion areas and zoned and serviced land ready for new homes and jobs'. While we support the provision of sufficient housing and industrial land to support our regional popula ion, the rate and footprint of this outcome can only be considered in the context of the opportunities and constraints presented by the other 'big ideas' such as the 15-minute neighbourhood, achieving net zero emissions, and a focus on green infrastructure, public spaces and nature. Assessing how the aim to continue the supply of land and housing to meet demand will fit with the 'big ideas' is made harder when the draft plan does not provide any clear forecasts of this demand, the likely land requirements, and the distribution across planning districts. This is 'implied' by some of the mapping, for example, but is not clearly set out with expected demand, ime frames etc.

• Recommend: Include a table showing, over time, the forecast population growth, housing requirements, predicted land take assuming a particular mix of infill/greenfield development, employment growth etc... hat the plan is based on.

We note the role of the 'Hunter urban development program committee' (page 17) who will be involved in the implementation and monitoring of the Plan and reporting on its progress. The membership of the committee covers organisations responsible for infrastructure planning and provision, and land planning, and development, including organisations who represent private developers who have a direct interest in the decisions of the

To ensure the committee can fully understand and consider the new 'big ideas' that are now central the plan, to expand the knowledge base, and to improve the transparency and accountability of the committee, its membership should be expanded to include organisations who have specialist knowledge and a regional overview of issues such as a path to zero emissions, First Nations stewardship and ownership of land, social infrastructure requirements to achieve equitable communities, and the need for 'green infrastructure, public spaces and nature'. We will not suggest specific organisations, but we are aware of several who could readily fill these briefs.

• Recommend: Expand the Hunter Urban Development Program Committee to include representative organisa ions with knowledge and regional understanding of issues such as a path to zero emissions, First Nations stewardship and ownership of land, social infrastructure requirements to achieve equitable communi ies, and the need for 'green infrastructure, public spaces and nature'.

The committee's brief includes to 'remove barriers and disincentives for infill housing' and to 'identify opportunities to accelerate the supply of land for housing and employment including improvements to land rezoning, release and servicing'. Similar actions are mentioned elsewhere in he plan. Unfortunately, these outcomes have often been achieved by removing planning and development decisions from local councils, reducing the assessment requirements for new land releases and developments, and 'standardising' housing types and design standards to meet a minimum threshold

We argue that this approach is counter-productive, especially as we face the new challenges of building zero-emissions climate-resilient communities and local economies. It results in a 'meet minimum requirements' culture for developments, that increases chances of objections and disputes wi h local au hori ies and communities that can delay rather than accelerate approvals.

Design excellence, innovation, and careful stewardship of the natural environment are essential to achieve the aims of this plan. This can only be achieved by setting high thresholds for land release approvals and then allowing those with the local expertise decide what is the best development for their local landscapes and communities. If his becomes the 'norm' then planning au horities, development assessors, and developers will quickly adapt to he new expectations and standards, and approval times should not be affected.

• Recommend: Measures to 'accelerate' and 'remove barriers to' development and land release should not be at the expense of environmental protections, design excellence, innova ive design and technology for a changing climate, and community engagement in decision making.

Place strategies

We note the inclusion of Williamtown in the place strategies as a 'region shaping gateway and industry precinct'. We raised objections to this during the preparation of the Newcastle Local Strategic Planning Statement. We suggested hat infrastructure, industrial and residential development around Williamtown should be limited due to several constraints:

- o The effect of flooding and rising groundwater and sea levels on low-lying land, services, and transport infrastructure
- o The limits on land use as a result of noise from aircraft and contamina ion by PFAS
- o The likely reduction in mass air travel as carbon budgets limit aircraft use and raise fuel costs

- o The incompatibility of industries based on weapons manufacture and delivery with the aim of a peaceful sustainable society
- o The continuing frictions caused by the dual use of Williamtown as a military and civilian airstrip
- o The limited land suitable for residential development which prevents airport and associated industry workers from living close to their place of employment, increasing travelling times and car dependency

We believe the airport would be better served by a modern, fast, and frequent transport shuttles to key des inations in Newcastle, Port Stephens and the Lower Hunter and that development around he airport should be limited to manufacturing and services that deliver directly to the airbase and airport. More general aviation and aerospace research would be better located close to urban settlements and in one of the industry and innovation catalyst areas identified in the Regional Plan, such as Callaghan.

So, gateway perhaps, but industry precinct no.

• Recommend: Limit development of Williamtown as an industrial and research precinct and direct activities to o her industry and research catalyst areas closer to services and residen ial accommodation such as Callaghan

Objectives

Objective 1: Diversify the Hunter's mining, energy and industrial capacity

Reuse of rehabilitated mining land is flagged as an opportunity for adding new infrastructure, developable land and biodiversity land. However, there is a high level of uncertainty over the successful rehabilita ion of land, the time it will take, and the suitability of rehabilitated land for a particular land use. This is particularly problematic with land for future agriculture and biodiversity uses, as it is easy to say loss of these current land uses to urban development will be 'offset' by future by gains of rehabilitated mining land.

- Recommend: Mining sites and infrastructure should be repurposed to support new and emerging industries where possible, but mining land should not be included in calcula ions of land available for future land uses until such times as the completion or near-completion of successful rehabilitation. New infrastructure and industries are required to diversify our economy and respond to the climate crisis and achieve net zero emissions by 2050. This provides opportuni ies for new industries in the Hunter that capitalise on our energy infrastructure and expertise and our excellent port facilities. They will provide employment and export opportunities for those workers and businesses such as coal miners who will be affected as we transition from fossil fuels. These opportunities will pose planning requirements that should be incorporated, or at least acknowledged, in this plan. They include: o Infrastructure such as shore support and transmission lines for offshore wind farms
- o Manufacturing, construction and maintenance services for wind and solar generators, electricity storage facilities, and green hydrogen production and transport
- o Identifying and protecting land that may be required for local-scale pumped hydro
- o Identifying the land use and infrastructure needs of the emerging green hydrogen industry

The NSW and Federal Governments are investing significantly to establish the Hunter as a renewable energy zone and hydrogen hub, along with hundreds of millions in private investment, and the Regional Plan should make sure we are ready and able to benefit from this opportunity.

• Recommend: The Regional Plan should include specific reference to emerging industries such as solar electricity generation and storage, offshore wind generation and green hydrogen and identify and accommodate their land use and infrastructure needs in the plan (or set up a process to do so in the near future).

Objective 2: Ensure economic self-determination for Aboriginal communities

Empowerment and control over decisions that affect people and their communities is at the core of self-determination – economic and otherwise. As a minimum, Aboriginal communities need to be given a place on the committees that are tasked with implementing and reporting on this plan and the ac ions in it.

Objective 3: Create a 15-minute region made up of mixed, multi-modal, inclusive and vibrant local communities

We are excited to see the Regional Plan adopt a goal of '15-minute' neighbourhoods and '30-minute communities'. The provision of cycling and all-ability walking access to neighbourhood shops, services, and public spaces will presumably become a design and development requirement for all new urban release areas.

However, he retrofitting of existing urban areas to achieve this is not so easy and, as 60%-80% of planned new development is in-fill, ways will have to be found to ensure his is achieved through developer levies, design requirements and direct public investment. This would fund construction of continuous bike networks in existing city and suburban area, upgrading of neighbourhood facilities to support a wider range of services, and improvement in the quality and extent of neighbourhood public spaces.

• Recommend: All zoning changes allowing in-fill development in existing urban areas should be accompanied by a comprehensive assessment of the goods, services and leisure needs of the new residents and their neighbourhood access to these, and a plan (including estimated costs) of ensuring these services are accessible via safe all-abili ies pedestrian pathways and dedicated cycleways. Who is responsible for preparing, paying for and implementing these plans may depend on the type, scale and loca ion of the release area or development.

Public transport is a key element of moving people away from car-dependency and providing 30-minute connections between larger centres that provide specialist services such as medical, higher education and legal facili ies. While buses will continue to be the mainstay of public transport around the region, the existing rail network plays an important role, and the expansion of the urban footprint and densifica ion of exis ing settlements offers the opportunity to expand and improve the rail network.

Our industries also depend on he rail network for freight transport, particularly in and out of the Port of Newcas le. Whether using fossil fuels or electricity, rail is a much more energy efficient way of transport that cars, trucks and buses, so will be important in achieving net-zero emissions. Improved suburban services would also open new opportunities to develop in-fill precincts around railway stations.

- Recommend: The Regional Plan should include actions to improve the existing rail network and iden ify potential needs and opportunities to extend it. Our suggestions include:
- o Upgrading the inter-city line to provide a 90-minute Sydney-Newcastle journey and a sub-2hr journey to Maitland
- o Electrifying all lines, particularly passenger lines, in he Hunter
- o Introducing metro-style and/or light-rail suburban services in the greater Newcastle area with fast and frequent services covering, say, Morisset to Maitland
- o Improving the frequency and standard of services on the Dungog and Singleton lines
- o Implementing the dedicated Sydney-Brisbane freight line by-pass and develop plans to service the 'National Pinch Point' areas around Black Hill and link it to a dedicated port-side line that takes freight off the suburban Newcastle network
- o Complete he construction of the Glendale interchange
- o Identify and protect rail corridors hat may support future extensions to he Lower Hunter Rail network especially in suburban growth areas such as Cessnock. Branxton, Minmi, Glendale and west Lake Macquarie

Objective 4: Plan for 'Nimble Neighbourhoods', diverse housing and sequenced development

Diverse housing should mean all new developments include a range of housing types, affordable and social housing, more sustainable housing designs, and houses with smaller footprints. However, the strategies in the plan do not provide any clear mechanisms or pathways to achieve these outcomes. If left to the market, the majority of new housing on greenfield sites will be single-storey bungalows at a price suitable for working couples, or retirement villages for over 55s. In both the new development areas and in-fill developments interventions in the market are required if the plan is to achieve a diversity of housing types and uses.

There are plenty of examples of such market interven ions such as government subsidies and developer levies, direct purchase by government and non-profits, and mandated provision as a condition of consent.

However it is achieved, we suggest there should be a minimum provision of 30% of new dwellings for affordable, special-needs and permanent social housing. This housing should be integrated across he development to prevent concentrations of disadvantage but should be situated close to public transport and services.

• Recommend: That all approvals for new estates and urban up-zonings include a provision for the supply of social, affordable and special needs housing. Social housing should be owned by government or non-profit agencies for that sole purpose. The plan should make estimates of the demand and provision for these types of housing in planning districts up to 2040.

Objective 5: Increase green infrastructure and quality public spaces and improve the natural environment

Urban greening is restricted by, among other things, the tendency for new and infill housing to have an increased footprint on their site, making it difficult to support large trees or on-site water infiltration. We suggest there should be a 'Basix' type requirement for some minimum vegetation and shade cover for all new buildings which, in infill development could include green roofs and walls or street setbacks to allow greater street canopy, and in new developments could include a ratio of canopy cover to building footprint or roof area across the whole estate or on individual sites. We note that one western Sydney Council has introduced a requirement of a large mature tree per building on a new estate.

The current focus in the plan is for urban shading and canopy to be provided in public places and infrastructure. However, with 60% or more of land in towns and suburbs in private ownership, these requirements must also apply to private land to reduce energy use for cooling and prevent urban heat island effects

• Recommend: That a planning or development requirement be introduced through Basix or other suitable mechanism for all new developments to provide a minimum level of canopy or green cover.

Improving the natural environment is, of course, best achieved by preventing any further loss of natural areas from encroachment and clearing for development. This is especially true in areas such as Greater Newcastle that have already lost nearly all of their natural areas and what remains is mostly small, isolated remnants.

In par icular, natural waterways and their riparian zones, wetlands, and the immediate coastal zone should all be protected from development. The Watagans to Stockton link, first proposed in the 1970's as a biodiversity corridor and identified for protec ion in previous regional plans is under serious threat from developments that have cleared bushland around Minmi and Black Hill, and from proposed new rail and road construction along the M1 corridor. What remains of this corridor needs to be protected if it is to retain any value as a functioning biodiversity corridor.

• Recommend: The remaining land in he Watagans to Stockton corridor such as Stockrington Valley, he western margins of Hexham Swamp, and the Tomago riverfront should be added to the reserve system and key private land in the corridor needs to be permanently zoned for environmental protection to prevent further biodiversity losses.

Objective 6: Reach net zero and increase resilience and sustainable infrastructure

Given 'the regional plan seeks to make climate change a guiding principle for all planning decisions' this section is inadequate, only dealing with natural hazards, air quality and car use. There are elements of net zero and climate change adaptation incorporated in the other objectives, but in general the plan is 'business as usual' – identifying and providing suitable infrastructure and services to allow release of new land for industry and suburban housing

We have already made suggestions above for how the plan can help achieve net zero or adapt to changing economic and climate conditions. It is not possible to re-write the whole plan to properly 'make climate change a guiding principle', so we will provide one example of how 'business as usual' fails this objec ive.

A new estate, house or apartment block built today has a useful asset life of about 100 years and may undergo a significant upgrade once or twice in that time. That means that to be 'zero emissions' by 2050, new estates and new buildings need to be zero emissions today, as they are unlikely to be replaced or significantly modified over the next 25 years. Does this plan consider this? Not thoroughly. To make 'climate change a guiding principle', this plan would ensure that proposed new release and infill development areas are designed and situated to:

- Remain safe and liveable during extended periods of above 40-degree temperatures
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This list provides some examples of the requirements for a truly zero emissions and climate change adapted development model for housing and industrial estates. Achieving this is made difficult by the 'exempt and complying' development provisions hat approve most dwellings providing they meet certain minimum requirements. These approval thresholds could be raised by improving building standards, si ing requirements and Basix requirements. While the Regional Plan is 'big picture' and does not do detail well, it must recognise that without these sorts of attention to detail in the approval process it cannot achieve net zero or adapt to climate changes and, in fact, it may well make things worse.

- Recommend: The Regional Plan make reference to the need for a review of building standards and Basix requirements if they are to achieve net zero and climate adaptability for new developments
- Recommend: New developments will not require connection to gas supply

Objective 7: Plan for businesses and services at the heart of healthy, prosperous and innovative communities

Objective 8: Build an interconnected and globally focussed Hunter

See previous comments re rail infrastructure and defence precinct at Williamtown.

District planning and growth areas

Greater Newcastle

Our response on many issues relevant to Greater Newcastle are included in earlier comments including he Williamtown defence precinct, the urban and freight rail network, the western biodiversity corridor, and development standards for infill development.

We would add:

- Recommend: Planning for the Broadmeadow catalyst area includes 'Hunter Park', the Broadmeadow railway yards and the 9-ways and Brunker Road precinct and be done as an integrated plan involving NSW and local governments, community and business stakeholders, and local residents.
- Recommend: A study be undertaken to identify industrial and other sites, such as the Wickham fuel depot and Carrington coal loader, that may be rehabilitated or moved to facilitate urban consolidation and new industries and, if necessary, schemes such as the grouting scheme be considered to rehabilitate sites to make them suitable for urban development.
- Recommend: Place Delivery Groups include members from effected or adjacent communities, local Land Councils, and independent planning and climate change experts.
- ** The Newcastle Greens Local Government Reference Group is a group of Newcastle Greens members delegated to consider, discuss and comment on issues relating to local government in the Newcastle LGA.

For all correspondence contact , Convenor of the Newcastle Greens Local Government Reference Group

PS: I'm sorry to have to paste my submission into this window but I tried unsuccessfully to upload the PDF file of the formatted submission. I will be happy to forward you the PDF file if you email me.

I agree to the above statement

Yes

From: noreply@feedback.planningportal nsw.gov au

To: DPE PSVC Hunter Mailbox

Subject: Webform submission from: Draft Hunter Regional Plan 2041

Date: Friday, 4 March 2022 11:59:22 PM

Submitted on Fri, 04/03/2022 - 23:59

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name



I would like my submission to remain confidential

No

Info



Suburb/Town & Postcode

Narara

Please provide your view on the project

I am just providing comments

Submission

Dear Dr Robert Stokes

I have found this plan to be very innovative, but have not been able to access the interactive hub site tonight (the last night) to provide my full feedback, getting the error message "This site is protected" when I login. Furthermore, my region has been affected by flooding and I would appreciate ano her 7-14 days to comment if possible.

I made one comment on he hub re 2 forms of enabling low cost housing via Community Land Trusts and SEPP 15 developments.

Another important aspect is to guard against the immediate effects that are being felt about climate change already (Australia and NSW has increased its temperature 1.4 degrees C since 1850 and is in a particularly vulnerable position already for bushfires, heatwaves, flooding, coastal erosion and droughts). There is much that can be done from an adaptation point of view that I feel is not captured in this plan:

- .. while infill development assists population increase by using existing infrastrucutre, care must be taken not to encorach on green spaces to combat Urban Heat Islands
- .. proper retrofitting of existing houses can lower the number of heatwave deaths
- .. careful management of development in floodplains and protection or retreat of housing from Low Elevation Coastal Zones (LECZs)

These are the only comments I can provide at the moment, but would appreciate a further discussion, having been the main author of the Beyond Zero Emissions submission into the NSW Energy and Resources Sustainability Inquiry and also the author of the BZE book "Cooling Your Home".

Kind regards,

I agree to the above statement

Yes



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NSW Department of Planning and Environment PO Box 1226, **NEWCASTLE NSW 2300**

E: hunter@planning.nsw.gov.au

4th March 2022

Subject: Submission - Draft Hunter Regional Plan 2041

The Councils of the Hunter region, through the Hunter Joint Organisation (JO), acknowledge the efforts of the Department of Planning and Environment (DPE) in preparing the draft Hunter Regional Plan (Regional Plan), and welcome the opportunity to review and provide a submission. The objectives identified within the draft Regional Plan are generally supported, and demonstrate a high level of alignment with the strategic directions for the region identified by Member Councils through the Hunter JO Board (read more on these strategic directions in our submission). This reflects well on the DPE officers who have worked to engage local government in preparation of the draft and they should be commended.

The areas for significant improvement to the draft Regional Plan relate to critical silence and/or ambiguity on enabling factors, which are indispensable to the realisation of the Plan's stated Vision and Objectives. These are:

1. Competitive Access to Global Markets

While the airport and port are referenced in relation to global connectivity, the document is silent on the role of the NSW Government in policy, funding and infrastructure that is essential to international air travel and containerisation as well as the intra-region transport connectivity to make both these gateways competitive access points to global markets.

Irrespective of the role of the NSW Government, we only need ask ourselves 'what are the likely future products and services coming from the Hunter?' and 'what markets will we service?' to realise that lack of competitive access to global markets undermines the draft Regional Plan entirely.

Increased certainty on this issue is critical to catalyse the volume of future investment to keep the Hunter in its current position, much less for it to grow.

2. Intra-region connectivity, specifically public transport

Many of the Objectives within the draft Regional Plan are drawn from global exemplars. Yet the plan lacks credible reference to a vital element that makes these exemplars function ... public transport. The metropolitan heart of the region immediately needs a vision and credible concept plan for an integrated public transport solution, followed by a staged delivery plan. The surrounding strategic centres need the same vision, concept plan and staged delivery plans for consistent, rapid



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services into the metropolitan heart, with sufficient increased frequency to make them a practical commuter option.

Increased certainty on this issue is critical to equity and productivity for current and future citizens as well as to retain and attract talent in a global market place that sees a viable public transport option as a critical marker for liveability.

3. Governance

Our submission explores this issue further but, in short, clarity on governance in turn supports clarity and execution with respect to how the Objectives are to be realised and who will be accountable for their delivery. In short, we are unsure how governance will work in light of recent announcements.

Our Submission

The important observations above should be read in conjunction with the information included in the following submission, which focuses on those areas where alignment across Member Councils has been identified. Broader and more detailed feedback on the draft plan as it relates to specific Council areas will also be provided by individual Member Councils separately to this regional submission.

Feedback provided in the submission is focused on the following areas:

- 1. Strategic Alignment and Direction
- 2. Population Forecasts
- 3. Governance Alignment and Implementation
- 4. Connectivity
- 5. Individual Plan Objectives

We would welcome the opportunity to further discuss our comments and recommendations.

Should you have any further queries or to discuss any aspects of our submission, please don't hesitate to contact me on

Yours Sincerely





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Submission by the Hunter Joint Organisation on the draft Hunter Regional Plan 2041

Introduction

The Hunter Joint Organisation is a statutory local government entity established by the NSW Government, through the NSW Local Government Act 1993, to support councils work together for better rural and regional outcomes, and to enhance the way local and state governments work together to plan and deliver important regional infrastructure and investment.

Member Councils of the Hunter JO include:

- Cessnock City Council
- **Dungog Shire Council**
- Lake Macquarie City Council
- Maitland City Council
- MidCoast Council

- Muswellbrook Shire Council
- City of Newcastle
- Port Stephens Council
- **Singleton Council**
- **Upper Hunter Shire Council**

The core statutory functions established for the Hunter JO are:

- 1. Strategic planning and priority setting to establish strategic regional priorities for the Joint Organisation area and to establish strategies and plans for delivering those priorities
- 2. Intergovernmental collaboration to identify and take up opportunities for intergovernmental cooperation on matters relating to the Joint Organisation area.
- 3. Shared leadership and advocacy to provide regional leadership for the Joint Organisation area and to be an advocate for strategic regional priorities.

The information provided in this submission focuses on those regional scale issues, priorities and responses on which Member Councils are aligned regarding the focus and directions that are identified in the draft Hunter Regional Plan.

Overall comments

1. Strategic Direction and Alignment

At an overall level the objectives identified within the draft Hunter Regional Plan are generally supported, and demonstrate a high level of alignment with the strategic directions for the region identified by Member Councils through the Hunter JO Board, which include:



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Strategic Priority	Focus
Connectivity	A globally focused Hunter connected to international markets will underpin the successful economic evolution of the region
	Efficient and effective access to global markets will be key to ensuring the region's competitiveness in the global marketplace.
	Addressing the existing transport infrastructure deficit and improving intra- regional connectivity is key to realising the broader aspiration and strategic goals for the region (i.e. economic evolution, liveability and resilience)
Jobs and a Growing Economy	As we transition to a clean energy future, we need to evolve the Hunter's economy to replace the dominance of coal with other products and services, at a level that will replace and ideally provide more jobs than those currently provided by the coal industry.
	Access to global markets to attract investment and talent to evolve our economy, and to sell our products and services on the world stage, will be key to the Hunter's economic evolution
Liveability	Creating a highly liveable region and facilitating ease of access to that lifestyle via global connections and improved inter and intra-regional connectivity is key to attracting and retaining skills and talent in the region, and providing a high quality of life for local communities.
Resilience	Ensuring the region is prepared for change, and able to withstand and recover from natural and human induced risks (i.e. natural disasters, climate change, economic and social disruption and change)

The objectives of the draft plan are also generally consistent with the Local Strategic Planning Statements and Housing Strategies of Member Councils that aim to increase urban consolidation in and around centres, housing diversity, walkable neighbourhoods, quality public places and green infrastructure, and access to jobs and services, as well as conservation of important biodiversity and natural areas.

While this alignment is welcomed, it has been identified that the draft Plan represents a significant shift in focus and direction from the previous Hunter Regional Plan 2036. As a general principle, if such fundamental shifts were to occur every five years, it has the potential to compromise the ability of Councils to take a long-term planning approach for the Hunter both locally and regionally.

From a delivery perspective, it is noted that the objectives included in the draft plan are quite broad, with limited detail on how they are to be realised and who will be accountable for their delivery. For those areas where Local Councils will have responsibility for delivery, it is recommended that clear principles be provided that can be used by Councils when assessing planning proposals, in line with the various governance arrangements that are in place. It is also recommended that a monitoring and reporting framework be established, implemented and regularly reported on by the NSW Government to ensure transparency and accountability around delivery of the Regional Plan.



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2. Population Forecasts

Recent work completed by the Hunter JO, which draws on the expertise and data of Councils, State Government Agencies and Authorities, and key regional stakeholders, is forecasting that the region is more likely to experience a 50,000 -100,000 population estimate above the NSW Government official population forecasts by 2041. This will require additional infrastructure, services, jobs and housing across the region to meet these needs. This potential increase in population will also impact objectives 3 and 4 bringing congestion, connectivity and housing issues into the future over and above the existing planning horizons identified in the draft plan.

A potential solution would be to build in regular population review mechanisms every 2-3 years that assesses the trajectory of population using a broad scope, similar to the population scenario planning work recently undertaken by the Hunter JO. The assessment would include 'trigger points' for population projections that invoke additional infrastructure, services, jobs and housing planning to meet future needs. The trigger points would be designed to meet preparatory planning needs (i.e. 5-10 years for planning to delivery of rail and road improvements, 3-5 years for housing developments etc.)

3. Governance Alignment and Implementation

At an overall level, it is the policy position of the region's councils, through the Hunter JO Board that the following is needed regarding the delivery of key regional planning documents such as the **Hunter Regional Plan:**

- Greater regional input and influence in decision making is required on projects and initiatives that will principally shape the region and its future
- Increased local (regionally based) leadership and involvement in tactical decision making, to facilitate understanding of and accountability around decision making at a local level, and to avoid a disconnect with place by State Government decision making around the delivery of local resources and programs.
- Greater accountability around the prioritisation, sequencing and resourcing of delivery of regional plans. Responsibility and accountability for the delivery of actions is dispersed and fragmented across a range of agencies and stakeholder organisations.
- Greater accountability within central government for prioritising the policy framework and resourcing needed to deliver key State Government Planning documents.
- More sophisticated approaches to planning and investment. Coordination of planning, infrastructure and budgets across delivery agencies will deliver better outcomes from public investment in the region.
- Improving the currently fragmented governance approach to the delivery of regional plans is required, to enhance strategic planning and investment in the region, at a time when such investment is critical to support the region transform and diversify its economy in the face of major structural adjustments in the energy, resources and manufacturing sectors.

It is noted that the draft plan identifies specific new governance arrangements regarding the delivery of the Hunter Regional Plan, including extension of the Urban Development Program Committee to encompass all of the Hunter Region, and the establishment of a Place Delivery Group to address agency referral and place-making matters. Specific feedback on these new arrangements



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are provided below, however at an overall level regarding governance arrangements proposed in the draft plan, the following comments are provided:

- In December 2021, the NSW Government announced the establishment of the Greater Cities Commission, which will now incorporate Newcastle, and potentially the broader GNMP area. Clarity regarding the involvement or relationship between the Greater Cities Commission and both the Hunter Regional Plan and GNMP needs to be clearly identified within the Hunter Regional Plan, to ensure accountability around decision making and plan delivery is clear.
- Other key regional strategies and reforms have also recently been released or are on the verge of being released. The relationship between these and the frameworks and responsibilities included in the draft regional plan are unclear. It is recommended that these strategies and reforms be considered concurrently, to ensure alignment between them and with the regional plan prior to it being finalised. This will provide greater certainty that planning proposals, consistent with the regional plan, will align with the statewide reforms and achieve more efficient implementation. Examples of these recent strategies and reforms include:
 - Transport for NSW's draft Hunter Regional Transport Plan
 - The Minister's recently released Planning Principles
 - Ministerial Directions (to come into place in March 2022)
 - · Recently revised SEPPS
 - Employment Zone Reforms
 - Greater Hunter Regional Water Strategy
 - Lower Hunter Water Security Plan, all of which have direct implications for the Hunter Regional Plan.
 - Regional Housing Task Force Recommendations Report

Hunter Urban Development Program Committee

The draft plan identifies the expansion of the Urban Development Program to encompass all of the Hunter Region, and to also "incorporate the landholdings of Local Aboriginal Land Councils to integrate these sites more effectively into an overall program of urban development". While improved coordination toward urban development based on a strong evidence base is supported, the following limitations with the approach identified in the draft plan have been identified by Councils:

- Councils to which inclusion in the Committee will be extended, will experience even further impositions on their already limited resources arising from both participation in the Committee itself and the requirement to prepare information and reports for the Committee. It should be noted that these Councils are generally more resource constrained than those participating in the existing UDP Committee for the Greater Newcastle Metropolitan Area. To assist with managing these resourcing impacts, it is recommended that a template for monitoring land availability should be created by DPE and financial assistance provided to councils to:
 - develop mechanisms to readily report on key parameters; and
 - develop place strategies without undue increases in demand on council resources.



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- The draft plan identifies a broad remit for the extended UDP Committee. Given representation proposed for the Committee includes a number of industry and professional stakeholders (eg. UDIA, Property Council), this could create the perception of bias toward development industry outcomes. This could be addressed by refining the scope of the Committee to a very specific role, or potentially broadening membership to reflect specific objectives and outcomes identified by the draft plan. For example, expanded membership could include:
 - NSW Communities and Justice to provide a focus on addressing housing issues around quality, availability and affordability
 - · Aboriginal representation, particularly given the integration of the landholdings of Local Aboriginal Land Councils within the remit of the Committee
 - Other relevant specialist State Government Agency representatives (eg. Department of Planning & Environment Biodiversity and Conservation Division) to ensure that all aspects of planning are considered.
- The current structure of the Committee and its focus has the potential to mean regional Councils characterised by lower urban growth rates (i.e. those not included in the current GNMP area) will be considered a lower priority for the Committee, reducing the ability of these Councils to provide development that is needed by their local communities

Place Delivery Group

The draft plan identifies that place strategies will be overseen by a place delivery group chaired by the Department, and including relevant public authorities, infrastructure providers and LALC's and councils. Improved alignment of infrastructure, planning and collaboration across government through the Place Delivery Group (PDG) is welcomed. To function successfully (i.e. with efficient and effective decision-making) and to provide certainty when planning significant growth areas it is recommended that the Place Delivery Group:

- Include all relevant State agency and utility representatives, such as Hunter Water and Ausgrid, to allow the group to consider all infrastructure simultaneously in planning for growth areas.
- Be provided with certainty on the provision of infrastructure in precinct planning. There is concern the PDG will have difficulty achieving this as most State agencies are unable to commit to infrastructure provision without funding available.
- Be clear on how commitments to Place Strategies and the associated infrastructure is to be addressed.
- Have quick and helpful direction for transitioning existing projects into the new process.

To be effective at a broader governance level, the PDG therefore requires the necessary authority and/or statutory backing to be able to compel or make agencies and other delivery partners accountable for the delivery actions assigned to them. This will be necessary to overcome primary challenges arising from portfolio driven governance arrangements independently driving the priorities of agencies that can contribute to sub optimal outcomes including misaligned sequencing of infrastructure and service delivery. Ensuring that the delivery, monitoring and evaluation systems established by the PDG are clear around delivery responsibility, the outcomes to be realised, the



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reporting obligations of delivery partners and the triggers / processes for amending priorities will be critical to successful implementation of the plan's objectives.

4. Connectivity

The region's councils, through the Hunter JO have identified intra-regional connectivity as a primary regional issue that will need to be addressed to effectively deliver on the objectives identified in the draft Regional Plan. The Hunter region is comprised of different communities, assets and features, that while individually unique, effectively function as a connected and collective whole that together underpin the identity, lifestyle and functioning of the region. Improved, effective connectivity within the region will be critical to successfully delivering the range of objectives included in the draft plan. Intra-regional connectivity will underpin the ability to provide affordable housing; to attract and move skills and talent throughout the region; facilitate the movement of goods and services efficiently and effectively (including to the regional's two major international gateways); and to provide the vibrant and liveable communities to which the plan aspires.

The place based planning approach underpinning the draft plan is recognised and supported, and will assist in maintaining and adding value to these local characteristics. It is recommended however, that the plan's narrative also strongly recognise the importance of maintaining and improving connectivity between these diverse communities, features and assets, to maintain the value proposition that this provides to residents and visitors to the region.

While the draft plan acknowledges that connectivity plays an important role in linking the region's diversity together, the objectives and strategies within Objective 8, focus predominantly on interregional and global connectivity. While this broader connectivity is central to the region's future economic evolution and liveability, it is recommended that an increased emphasis be included in the plan around "intra" regional connectivity, which will be crucial to ensuring that the region itself will be able to best capitalise on the opportunities from enhanced global connectivity provided through Newcastle Airport and the Port of Newcastle.

While the plan addresses the identification and prioritisation of infrastructure on a place based / structure planning basis, it is unclear how the identification and prioritisation of regional scale infrastructure required to underpin connectivity between "places" will be identified and prioritised. This will be important to ensure that key intra-regional infrastructure needs are strategically identified and planned for, and to ensure that the impacts of local place based planning don't negatively impact on regional infrastructure connectivity, for example, the creation of new transport pinch pints within another place arising from planning decisions occurring elsewhere that have not adequately considered the broader impacts of place based planning decisions.

<u>Standardisation / Streamlining of Delivery Processes</u>

It is noted that the Infrastructure First Place-based Delivery process is an approach that is also reflected in the recommendations of the Regional Housing Taskforce Recommendation Report. The Infrastructure First Place-based Delivery process identified in the draft regional plan however, can currently be interpreted as having a bias towards streamlining greenfield development over infill development to cater for growth. It is recommended that the process:



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- Streamline planning processes to support infill development and growth outcomes; not only greenfield land release. The vision of the draft Hunter Regional Plan is unlikely to be realised without State Government action and funding support to unlock infill development and improvement of existing urban environments in line with the Better Placed and Greener Places guidelines.
- Provide a genuine streamlined process that does not simply replicate the existing rezoning process.
- Provide an appropriate funding mechanism to enable councils to more actively pursue strategic goals rather than relying on proponents to fund planning investigations.
- Consider the priorities within each Council area and not just the priorities of high growth locations (eg. the residential yields and minimum lot sizes will differ significantly between metro locations and regional towns)

To this end the Hunter JO has been working on a project with stakeholders to achieve 'A collaborative approach to rezoning in the Hunter region', to investigate a common approach to rezoning processes to achieve the following objectives:

- Streamline, simplify and standardise processes for Hunter councils and proponents.
- Target key barriers to deliver in the planning proposal process.
- Ensure Hunter councils and DPIE (and the community) see a return on the investment in regional and local strategic planning and the adoption of local strategic planning statements.

Supporting processes and frameworks will be essential to ensure successful delivery of the regional plan. This includes measures that:

- Can be put in place at the regional level within the regional plan, to provide greater certainty and efficiencies during the planning and rezoning process.
- Are supportive of reform to processes 'behind the plan' at the regional level to achieve collaboration, and efficient implementation of strategic planning outcomes.

At a workshop in September 2021 hosted by the Hunter JO, the following matters were identified as key areas to improve to achieve rezoning (in order):

- Standard process for resolution of agency issues
- Standard agency advice on specific issues
- Gateway information requirements
- Standard Gateway conditions
- Planning proposal templates
- Lodgement forms

At the workshop, agency consultation and resolution of agency issues was identified as a key issue in the planning proposal process. Including processes and measures in the regional plan that provide further guidance on the resolution of agency issues 'up-front' during the strategic planning and planning proposal process would be of benefit.

This project is ongoing, and the Hunter JO and member councils look forward to continuing to collaborate with the DPIE Hunter office on it to achieve these objectives, which would support the implementation of the regional plan when finalised.



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5. Comments Specific to individual draft plan objectives

Objective	Comments
Objective 1. Diversify the Hunter's mining and industrial capacity	The Plan highlights a shift in the government's approach to post-mining land use considerations. Rather than returning land to its pre-mining state, or as agricultural or biodiversity land, the Plan states there may be opportunities to utilise mining infrastructure to leave an economic legacy for the community, with opportunities for future investors to develop the land post-relinquishment.
	This approach is supported, as is the action identified in the draft plan for the Department to investigate site compatibility mechanisms to allow development applications to be lodged for non-permissible uses and associated subdivision for the areas of interest parts of mine sites consistent with the Hunter Regional Plan, and considering mechanisms to provide more flexibility in post mining land uses as part of the development consent process. It is recommended that when implementing this action the following be considered: • Proximity - Implementing this action is particularly relevant to circumstances where mines are not too remote from other services and amenities, or the site will be able to provide these as well. • Managing industrial capacity and creating flexible planning and development controls will need to respond to new opportunities and technologies, including catalytic investments and transition to net zero emissions. This may mean a shift from traditional industrial and manufacturing into advanced and smart manufacturing, artificial intelligence and robotics, or more distributed manufacturing. Ecommerce is increasing demand for warehouse and logistic properties to accommodate automated warehousing.
	Compatibility criteria should actively facilitate the implementation of industries and practices that align with the NSW Governments' targets and objectives for "Net Zero by 2050" and the Hunter Renewable Energy Zone, and the region's move toward a Circular Economy.
	Strategy 1.4 Circular Economy – the inclusion of Circular Economy within this objective is welcomed, as are the range of focus areas identified within the Strategy. It is recommended however, that an additional action be included to remove barriers / provide incentives and planning support to facilitate the establishment of knowledge and innovation hubs within circular economy precincts.







Objective	Comments
Objective 2	Comments This shipsting is supported the property of the shipsting in the
Objective 2 - Ensure economic self- determination for Aboriginal communities	This objective is supported. However, as identified previously in this submission, while the expanded focus of the UDP Committee identifies an expansion of scope to include the landholdings of Local Aboriginal Land Councils within its remit, there is no representation from Aboriginal communities on the proposed UDP Committee. Building capability and capacity within Aboriginal communities and organisations to ensure economic self-determination will also require significant support and resourcing. It is recommended that the NSW Government provide the necessary resources to support this process.
Objective 3. Create a 15- minute region made up of mixed, multi- modal, inclusive and vibrant local communities	This objective is supported, however as acknowledged in the plan, it represents a significant change in approach for the region, given that for many decades, growth in the Hunter has assumed that cars would continue to underpin most of our needs, often involving travelling long distances to do so. As a consequence, regional growth has developed both in land use, urban design and transport infrastructure, in a way that has made personal vehicle use the most attractive choice, and indeed often the only realistic choice.
	The following factors need to be considered regarding delivering on this objective: Greater clarity is required as to how this objective will be achieved in regional towns and villages where the public transport (school based) and pedestrian/cycle paths are limited, and where the current density ratios and percentage of infill versus greenfield development are substantially different to more urban areas, which is often a reflection of lifestyle choice (i.e. a desire for larger lots in peri-urban and rural areas) To be successful, integration of this objective will be required within other key regional planning strategies, activities and services (e.g. Regional Transport and Health Services strategies). This objective can be supported substantially through the establishment and/or protection of regional corridors to facilitate both local and regional interconnectivity. For example, the region has a number of existing regional corridors including existing or former rail lines, that if proactively preserved have the potential to provide: Future routes for light or heavy passenger rail Bus routes Recreational walking and cycling routes Development of an assessment matrix would assist councils and/or applicants to determine how easy and enjoyable it is for a person to access their local centre. Walkability studies and cycling studies will need to be developed to support the 15-minute neighbourhood concept. A matrix should be included to allow councils to determine future residents' accessibility to local centres in a relatively comparable and consistent way.







Objective	Comments
- Dijective	Work undertaken by the Hunter JO during 2021 has identified the significant
	potential to link existing and planned cycleway infrastructure across all council areas; to create an integrated region wide network. The "Shiraz to Shore Cycle Trail", connects the picturesque wine country to the spectacular coastal beaches and lakes, providing the spine to a much broader connected regional cycleway experience. The Shiraz to Shore concept takes advantage of the Hunter's flat river valley to create a truly accessible cycle experience that doesn't require a high level of the fitness or skill. In addition to improving local connectivity between centres, the project would be a showpiece regional asset and experience that would attract cycle tourism to the region, which is well documented as a driver of visitor spend and overnight stays. The inclusion of "Shiraz to Shore" as signature connectivity project within the strategy would be welcomed.
Objective 4. Plan for "Nimble Neighbourhoods", diverse housing and sequenced development	While increasing population density is supported, achieving an urban density requirement of 50-75 persons per hectare region-wide will be very challenging. One way to address this may be to set more specific targets and timeframes for high and low growth areas rather than establishing one target for the whole region. Such targets could reflect the particular lifestyle and characteristics of localities (e.g. coastal and rural features).
	Clarity is needed on how the minimum of 50-75 dwellings per hectare is to be applied. Housing as "complying development" does not necessarily trigger a council's involvement and existing greenfield developments in the Hunter are currently not meeting this target. There needs to be clear direction and possibly modelling in areas where it can be achieved to assist and encourage its take-up.
	The Regional Housing Taskforce Recommendation Report (October 2021) makes a number of recommendations that are consistent with achieving this objective. It is recommended that these be considered and reflected within the plan, particularly given the challenges surrounding housing affordability in the region.
	The draft regional plan discusses the need for a range of housing types – including affordable, diverse, and accessible. To achieve these outcomes, Councils welcome further support from the NSW Government. For example, at a practical level this could include photos and videos showing how well-designed smaller dwellings and infill can work. These could show how affordable and diverse housing can be well integrated, with real examples to help pave the way for the region rather than each council try to sell this important message on an individual basis. Financial or planning incentives could also be provided to encourage adaptable housing that enables people to live through different stages of their life without having to sell and move.







Objective	Comments
	Disability inclusion and accessibility are key principles that Councils are required to address in local planning processes. It is recommended that a stronger emphasis be placed on these aspects within the objectives and principles of the regional plan.
Objective 5. Increase green infrastructure and quality public spaces and improve the natural environment	Recognition by the plan of the importance of connection to nature, and that it is increasingly important to provide access to nature and green infrastructure is strongly supported. Coastal environments (lakes and beaches) and natural areas (waterways and biodiversity) are environmental assets at the core of the region's "value proposition", and a strategic regional approach to their planning and management is paramount to the future liveability and economic evolution of the region. This includes consideration of the strategic opportunities for realising regional biodiversity outcomes that can be realised from the future management and rehabilitation of mining lands.
	The draft plan identifies (Strategy 5.6) the need for "strategic land use planning to identify and take account of the location and extent of areas of high environmental value, including areas of high environmental value, including areas of potential serious and irreversible species, threatened species, biodiversity corridors and koala habitat". This strategy is strongly supported, however in order to be effectively realised, there is a need to undertake a strategic region-wide biodiversity conservation assessment process, and from the outcomes of this process, develop a Regional Biodiversity Conservation Plan or equivalent. Such a plan would identify regionally significant biodiversity assets and corridors and guide the effective conservation, restoration and management of biodiversity and natural areas across the region, including but not limited to the areas of habitat connectivity identified in the draft plan (p48). As well as taking a broad region-wide approach to biodiversity assessment and planning, a plan of this nature would provide a strategic context within which to direct the identification and implementation of biodiversity offsets generated from development processes to locations of strategic priority and value across the region.
	While waterways are identified within the draft plan (Strategy 5.10 and 5.11), these strategies are quite limited in scope and focus predominantly on development assessment. The potential to rehabilitate and reconnect the region's waterways with the community is substantial, and would provide environmental, economic and recreational benefits for local communities right across the region, as has been demonstrated in other cities and regions around the world where substantial waterway restoration initiatives have been undertaken. It is recommended that the regional plan take a more strategic approach to the planning and rehabilitation of the region's waterways to realise these potential benefits right across the region.







Objective	Comments
	Building on the above comment regarding Strategies 5.10 and 5.11, creating more green space and opportunities for community activity in direct proximity to the region's waterways could also be activated by planning strategies and mechanisms that encourage more adaptive, softer approaches to flood mitigation and drainage (e.g. the restoration of concrete drainage channels to more natural waterways and reduced "hard' engineering solutions for managing flood risk.
Objective 6. Reach net zero and increase resilience and sustainable infrastructure	From the perspective of building resilience to the impacts of climate change, this objective focuses predominantly on natural disasters / resilience to shocks. It is recommended that greater recognition be included within this section of the need for the region to proactively plan for the longer term risks and opportunities that will arise from forecast changes in climate. These risks and opportunities span all aspects of the region's communities and economic activities, including agriculture, mining, food security, water management, retail and tourism.
	Particular reference should be made to the Hunter Central Coast Adaptation Strategy developed by DPIE and endorsed by the Hunter Central Coast Regional Leadership Executive in late 2021. This strategy seeks to guide regional collaboration and complementary approaches to increase regional resilience to climate change impacts, across a number of focus areas that are strongly aligned with those of the draft Hunter Regional Plan. Through the strategy, government will build adaptive capacity in the Hunter and Central Coast regions to respond to the negative impacts of climate change and engage effectively with the community to ensure an equitable adaptation to climate change impacts for the whole community.
	Building resilience of the region's water resources (quantity and quality) is not really addressed within this objective, however future access to water supplies will underpin the delivery of many of the other objectives and strategies identified within the draft regional plan (economic, social and environmental). It is recommended a greater focus on water resilience be incorporated, including strategies for ensuring place based plans integrate increased water resilience and efficiency within the urban environment, for natural ecosystems and for increasing agricultural diversity and intensification.
	A transition to low emissions transport across the region will play a substantial role in facilitating achievement of this "reach net zero" objective. The opportunity exists for the regional plan to outline a more strategic approach to the planning and implementation of zero / low emissions transport technologies and networks across the region (e.g. EV charging networks) to facilitate the uptake of such technologies, and to attract







Objective	Comments
	external investment in this kind of infrastructure across the region. Planning strategies and development standards have the potential to facilitate, incentivise or regulate to encourage these changes along with car free, car emission neutral developments.
	The integration of resilient housing design principles within new developments and the retrofitting of older developments (along with broader streetscapes and community spaces) to improve both resilience to climate impacts (eg extreme heat, storms and flooding) and energy and water efficiency, has the potential to contribute substantially to achieving the "reach net zero" target. The regional plan has the potential, through strategic goals and planning controls, to facilitate the uptake of more resilient and efficient design, which in addition to reducing shock impacts arising from extreme events, will also contribute to long term housing affordability and liveability by reducing ongoing household operating costs.
Objective 7. Plan for businesses and services at the heart of healthy, prosperous and innovative communities	The draft regional plan does not articulate the current skills shortages facing the Hunter Region, where less than 50% of the population have post-school qualifications, yet 90+% of future jobs are expected to require such qualifications.
	It is recommended that this objective should be accompanied with a region-wide plan to develop local skills and attract people to the region who are highly skilled. In line with this, the name of the objective could also be renamed "Plan for highly skilled people at the heart of healthy, prosperous, and innovative communities" to reflect the significance of this challenge.
	COVID-19 pandemic has led to a significant increase in people working remotely, often connected to employment in Sydney, Melbourne, or other global cities. There is an opportunity for the Hunter Region to attract remote workers due to the advantageous lifestyle our region offers. Similarly, region-wide strategies could be implemented to integrate remote workers with local professional ecosystems.
	Strategy 7.5 does not appear to be a strategy, but a list of activities already undertaken. Health care is an important part of the Hunter's economy and services and should be better integrated and supported with strategy. Similarly, education and childcare are very important to a functional and successful community and direction is needed in these areas.
	Strategy 7.3 "Night-time Economy" – the extension of the focus of night-time economy activities to incorporate non-alcohol based activities such as extended opening hours for libraries, galleries and museums is welcomed and encouraged.







Objective	Comments
Objective 8. Build an inter-connected and globally focused Hunter	The objective of building an interconnected and globally focused Hunter is fully supported, however this needs to encompass both inter-connectivity and intra-connectivity to be successful.
	Strategically, one of the key moves required to underpin the successful economic evolution of the region is to significantly improve direct connectivity to global markets. This will provide the opportunity to underpin the replacement of coal by building demand for new and additional products and services, and at the level that will be needed to replace jobs that will be lost from the region's transition away from coal. Efficient and effective access to global markets will also be key to ensuring the region's competitiveness in the global marketplace.
	Creating a highly liveable region and facilitating ease of access to that lifestyle via effective global connections will also be key to attracting and retaining the skills and talent needed to drive this economic evolution.
	As well as ensuring that the region is connected globally and to other regions, the regional plan needs to include a focus on intra-regional connectivity. This is necessary to address and rectify not only an existing deficit in transport infrastructure that exists in the region, but will be integral to ensuring other plan objectives such as the 15-minute region, affordable housing; attracting talent, facilitating the movement goods and services efficiently and effectively throughout the region; and providing vibrant and liveable communities can be realised.
	In addition to hard infrastructure, improving intra-regional connectivity will also require strategies around transport system reviews, including the improved integration and timetabling of transport services to meet community needs and to connect key regional facilities. This is a substantial task that will require collaboration across a number of State Government agencies and key regional stakeholders such as Newcastle Airport and both public and private transport providers. It is recommended that this be included as a strategy in the Hunter Regional Plan along with who will be responsible for driving this process. If addressed within the draft Hunter Regional Transport Plan, it would be good to reflect this within the Plan.
	In addition to the current strategies identified in the draft plan, it is recommended that additional focus be included that recognises the importance of off farm supply chain infrastructure and services that are necessary (e.g. warehousing and distribution facilities) to ensure the viability of on farm activities by ensuring their products are able to connect efficiently with both domestic and international markets. This should consider the planning strategies or measures can be implemented to facilitate the appropriate and timely establishment of such facilities.









From:

To:

noreply@feedback.planningportal nsw.gov au

DPE PSVC Hunter Mailbox

Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Friday, 4 March 2022 11:59:53 PM

Attachments: 20220304 hunter-jo-submission draft-hunter-regional-plan-final-(v1.0.doc

Submitted on Fri, 04/03/2022 - 23:58

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name





I would like my submission to remain confidential

Info

Email

Suburb/Town & Postcode

Thornton 2322

Please provide your view on the project

I am just providing comments

Submission file

20220304 hunter-jo-submission draft-hunter-regional-plan-final-(v1.0.doc

Submission

Please see attached cover letter and submission.

I agree to the above statement

Yes

TO WHOM IT MAY CONCERN:

SUBMISSION IN RESPONSE TO EXHIBITION OF DRAFT HUNTER PLAN 2041

Thank you for the opportunity to make this submission in response to the exhibition of the Draft Hunter Regional Plan 2041.

I have been an active participant in regional development matters in the Hunter since my involvement as an environmental and social justice advocate in the 1980s. I was a Newcastle councillor (during the 1990s), have taught matters related to regional development as an academic at Newcastle University (during the 1990s and 2000s), and have maintained my interest and participation in such issues through active involvement in various community-based organisations and projects.

While there is much to be commended in the Draft Plan (particularly its focus on urban forests and "green infrastructure"), it also has significant deficiencies, and this submission focusses on a number of these aspects of the document (hereafter referred to as the Draft).

1. Review or entirely new strategy?

The most salient general characteristic of the exhibited Draft Review document is that, despite its title and its explicitly stated claim, it is not a "review" at all: it is rather an entirely new plan, offering no evaluation or critique of the document of which it purports to be a "review". The cursory attempt to do so on p.10 of the Draft merely emphasises this. There is no detailed, evidence-based evaluation of the Hunter Regional Plan 2036 (adopted in 2016). That Plan was structured on five Goals and 27 Directions, none of which are "reviewed" in the Draft to determine – with the benefit of hindsight – whether they were worthy or relevant goals, or to what extent they have been achieved. This is surely the fundamental preliminary task of any genuine review, providing the primary evidential basis for any proposed changes to the original Plan. The new Draft is entirely dissimilar from the Plan it purports to review in almost every respect, without any adequate explanation for why this is so.

For example, the former Plan made much of the role of the (then) Hunter Development Corporation (since renamed the Hunter and Central Coast Development Corporation) in implementing the Plan. In my view, this was misconceived, and I strongly support the apparently diminished role that that organisation will play under the Draft, but the "review" provides no justification for this.

Whatever the merits or otherwise of the new Plan, the general "review" approach adopted for this Draft (i.e., effectively treating the preceding Plan as though it hardly existed) is methodologically unsound, and corrosive to public confidence in the strategic planning system. Future five yearly review processes must be far more focussed, robust, transparent, and accountable than this one has been.

Since the 2016 document is not in the list of repealed documents in Appendix A of the Draft, the Draft should also clarify the status and relevance of the 2016 Plan in the light of this 2022 "review" document.

2. Housing "diversity"

Housing diversity (to which the Draft repeatedly refers) is not an inherently desirable public policy objective. To take it to an extreme in order to demonstrate this point, a combination of poor and excellent housing (or of ugly and attractive housing) is clearly more "diverse" than only excellent (or

only attractive) housing, though few would argue (at least explicitly) in favour of this kind of "diversity". While it is never so blatantly stated, however, this appears to be very much implicit in the use of the term by some development proponents. Where I live, for example (Tighes Hill), the local community has been advocating for many years for greater recognition and protection by the council of the area's desired local character, which is highly valued by Tighes Hill residents. However, residential buildings that are clearly unsympathetic with desired local character are still being imposed on our community, partly on the grounds that buildings that differ from the housing styles that contribute to desired local character offer more housing "diversity" exactly because of this difference. Thus the argument for "housing diversity" has been pitted against the argument for preserving "desired local character", and, as a result, local residents are becoming increasingly suspicious of the use of this term by planners and developers, considering it often a coded term for "ugly, inferior, incongruent or inappropriate housing". Developers consistently use the term "housing diversity" in planning proposals and development applications, appealing specifically to policies, strategies and plans (such as this) that encourage housing "diversity" as though any housing that differs from its context (and therefore increases "housing diversity") is for that reason desirable. Providing housing that suits diverse human needs is a worthy public policy objective, so if this is what is meant by the term "housing diversity" in the Draft, please don't assume that this is how it is understood or applied in the industry or the community. At the very least, the intended meaning of the term should be included and clarified in the Glossary.

3. "Biodiversity":

Much the same argument applies to the use of this term. Introducing feral animals and exotic plants into natural areas increases the biodiversity of those areas, but is clearly not a desirable policy objective. The term "natural biodiversity" should be used instead.

4. "Green infrastructure"

This term (which did not appear at all in the 2016 Plan) is problematically defined in the Glossary (p.126), and confusingly used throughout the Draft. In some cases (e.g., the Glossary definition), natural areas are included in "green infrastructure", while in other instances the Draft text distinguishes (in my view, more correctly) between "green infrastructure" and natural areas.

Green infrastructure should properly refer to areas where aspects of nature, while significant or prevalent, have been modified by human activity to the extent that natural ecological processes cannot fully function. This would include areas such as the urban forest, parklands, urban beaches, highly modified waterways, etc. Such areas are typically used for human activities such as recreation and tourism, requiring significant management and maintenance, and the provision of facilities to assist these human activities.

Natural areas (such as wilderness, wetlands, larger bushlands, etc) that are relatively undisturbed by human intervention and where natural ecological processes still predominate over human-induced processes (or are being rehabilitated to be so), should be consistently distinguished from "green infrastructure".

This is not a mere semantic issue: the challenges presented in planning and managing natural areas are quite different from those for "green infrastructure", and the lack of a clear distinction in the use of these terms may create significant confusion, particularly among planners referring to the Draft for guidance in developing planning instruments or controls, or in assessing planning or development proposals, or among developers in preparing development proposals.

The Draft sometimes appears to recognise this distinction (e.g., the Parliamentary Secretary's Foreword, which distinguishes between "green infrastructure and natural spaces" (p.7); or the text of Objective 5 (p., which distinguishes between "green infrastructure" and "the natural environment". However, the problem is most evident in the Precinct descriptions in Part 3 of the Draft, where text descriptions identify natural areas (e.g., in the descriptions of the Hinterland and Barrington precincts (p.97 and p.103 respectively) includes references to the World Heritage natural areas in these precincts, but these do not appear in the associated diagrams (same pages), which clearly assume these areas to be included under the "green infrastructure" label in the diagram.

This pattern is repeated for several other precincts. These diagrams should be modified to include "natural areas", as distinct from "green infrastructure", and the Glossary definition of green infrastructure should be modified to distinguish it from natural areas. Other references to "green infrastructure" in the document should be checked to ensure consistency of use.

5. "High Environmental Value"

As in the 2016 draft, terms such as "high environmental value areas" and "areas of high environmental value" are used frequently in the Draft, but without any definition of what constitutes "high environmental value". A definition of this term should be included in the Glossary, and this definition should include (at least) high conservation-value land, biodiversity corridors, areas containing threatened or endangered species, or habitat areas for such species.

6. Economic diversification and need for post-coal transition planl

This submission welcomes the Draft's (albeit belated) recognition that the global shift away from coal as an energy source means that the Hunter must diversify its economy, and its statement that the government will assist in achieving this. This transition should have begun in the 1990s, when scientists warned the world of the dangers of climate change and the need to move away from burning fossil fuels. As many of us were saying back then, there was then a comfortable window of opportunity for a Just Transition away from coal toward new cleaner industries. However, successive governments in thrall to the fossil fuel industry failed to heed this call, and – as was then predicted – will now have to facilitate a much faster and probably more disruptive transition. While appearing to recognise the need for this, the Draft does not provide a comprehensive transition plan away from coal, nor refer specifically to the need for one. However, this is exactly what is urgently required. The Draft should specifically recognise this, and initiate the required process.

7. Toward net zero emissions

The Draft's recognition of the need to move away from a fossil fuel based economy and toward net zero emissions is a significant advance on the previous Plan (which failed to even mention the need to reduce carbon emissions). However, the objective to achieve net zero Greenhouse Gas Emissions by 2050 is too little, too late. This target should be adjusted to reflect the current scientific consensus on the urgency of achieving net zero as soon as possible.

8. Light industrial zones:

Australia's planning systems needs to change the design paradigm for these zones (and for many commercial zones) and insist on a much higher quality of design for many developments within them. Many such zones (e.g., along Industrial Highway in Newcastle) are sited on visually significant streetscapes and gateway sites, but development proposals (and development controls) take little notice of this. These kinds of developments constitute the "Australian Ugliness" that is so infamous,

and that should be curtailed. There is no reason why light industrial or commercial developments should not be required to contribute positively to urban streetscapes and visually significant gateway sites. They do not have to be ugly, and local and state governments should be doing more to insist that they are not. Obviously, this is a general comment that applies to developments in all such zones across NSW (indeed, across Australia).

This submission does not entirely agree with the statement in the Draft that light industrial zones near the Wickham rail terminus (i.e., in Wickham, Carrington, Islington, Tighes Hill and Maryville) should be retained. Light industrial zones near inner-city residential areas such as these can be successful where the nature of the light industrial activity does not detrimentally affect the amenity of nearby residences, and where the light industrial zone is sufficiently separated from nearby residential areas (e.g., the Revelation Close area in Tighes Hill). However, this is not the case with many of the light industries in these areas (particularly the older ones). In Maryville, light industry has had a damaging impact on residential amenity and a debilitating impact on the development of community identity. Historically, "industrial creep" from these areas into adjacent residential areas has contributed significantly to this. The trajectory of government policy in relation to the development on the Newcastle CBD has been to stimulate more office and residential development around the Newcastle West and Wickham area, and this is likely to continue and to spread over time. Special care should be taken to ensure that any future light industrial developments in this area are compatible with this trajectory.

The remnants of heavy industry close to residences in these suburbs should also be relocated to more appropriate sites. The recent fire in Annie St, Wickham (which triggered a level 10 emergency due to the proximity of large fuel storage tanks) is simply the latest demonstration of the need for this (which residents have been calling for since the 1980s).

Yours sincerely

From:

To:

noreply@feedback.planningportal nsw.gov au
DPE PSVC Hunter Mailbox
Webform submission from: Draft Hunter Regional Plan 2041 Subject:

Date: Saturday, 5 March 2022 12:00:01 AM Attachments: draft-hunter-regional-plan-(2022-review.pdf

Submitted on Fri, 04/03/2022 - 23:59

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name



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TIghes Hill 2297

Please provide your view on the project

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Submission file

draft-hunter-regional-plan-(2022-review.pdf

Submission

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Yes