



DETAILED COMMENTS ON DRAFT STRATEGY POSTED IN JANUARY 2012 FOR HRVF SURVEY

Submitted 21 February 2012

BACKGROUND

The following is a list of comments on the latest draft. They have been cross-referenced to our earlier submission entitled “Detailed Review of Draft of Nelson Bay 2030 Strategy Circulated early November for Forum”.

It is acknowledged that many of our points raised in this review have been considered and appropriate amendments included. The following comments identify matters of concern which remain in the draft and they are cross-referenced if appropriate to the number (in brackets coloured red) of comments raised in our November Review.

COMMENTS

1. (2) “Map of study area”:

The map on page 5 is confusing due to its poor print clarity and the failure to describe what is represented by the land labeled “Nelson Bay” in bold letters (is this a statistical area or the suburb of Nelson Bay or something else?) .

The map on page 6 is welcome but the boundaries need adjustment to pick up the whole geographical area which is the focus of the strategy. The “Foreshore” should align with the area which was the basis for the Ardent Leisure “concept plan”. It should include the land immediately west of the Fishermans Co-op where there is a proposal for a mega fish market and restaurant, the Crown Reserves extending to the eastern groyne and associated open space, the reserve south of Victoria Parade and the full site of the Donald Street East carpark. These extensions were discussed and according to my notes, accepted at the 15 February Forum meeting.

There has been significant progress in defining “ Nelson Bay” for the strategy and in clarifying the areas associated with various projections of growth. There still seems to be some confusion in

respect of terms used. For example, in presenting on the Traffic and Parking Review, the consultant referred to the “Nelson Bay catchment area”. In the first three paragraphs of page 10 of the January draft there is an attempt to more clearly define terms such as “town centre” and “catchment areas”. It was not clear that the consultant was referring to the same areas as now defined in the draft strategy on page 10 (see Paragraph 2 which TRRA agrees with).

2. (5) On page 4 under “Setting” reference is made to the challenge of “landslip on steeper sloping sites”. Is this a problem within the study area given that the locations nominated for development do not seem to be on the excessively steep slopes? Suggest a check be made with the engineers.
3. (6) On page 8 under “Establishing its Position” the LHRS projections are discussed in paragraph 1. The interpretation of these projections in this paragraph now align with what was advised to TRRA by the LHRS and properly describe the implications for the town centre. (There could be an acknowledgement that the LHRS is to be the subject of a significant review)
(8), (9) The paragraph at the end of page 8 is difficult to relate to the table on page 9. Again there is no definition of “Nelson Bay Area” and does this match the area covered by Nelson Bay in table 2 on page 9?

No justification for the projections is provided. The observation in Para. 5 on page 10 that the LHRS projections represents a “business as usual outcome” is not explained and on recent low growth trends is open to serious challenge.

4. (13) Pages 12 and 13. This line of argument is totally rejected as there are many examples where a supermarket has been accommodated in an existing retail precinct and rescued it from annihilation by nearby competing centres e.g. Lane Cove, Manly, Manuka in Canberra and Port Macquarie are just a few examples where a supermarket has bolstered and not detracted from the appeal and vitality of the existing centre. Another positive is a major boost to free parking, usually 2-3 hours, right in the centre of town. More comprehensive arguments are presented in our earlier comments - see (13)

The point is taken that the planning conditions should block the big box design model in favour of active retail frontages and setbacks with landscaping. The possibility of residential use above the retail is also a means of diversification and intensification if that is the aim. The supermarket issue is now almost academic as there is a DA submitted for the Stockton Street Woolworths site (on which TRRA has made a submission).

5. (14) Pages 13 and 14 “Tourism”: It should be mentioned that the natural attractions and ambience of the foreshore are paramount attractors for visitors to Nelson Bay. Visitors seek an experience which differs from their place of origin not a replication of a dense urban built form.

6. (16) Page 16 “The primary aims of future transport planning” - In our view the first priority is **to provide a viable by-pass route for through traffic**. This does not rate a mention!! (although it seems that GHD consultants now realise its significance)
7. (18) “Maps Pages 17 and 19”: The proposed extension of Yacaaba Street to Dowling Street is not mentioned. TRRA queries the sense of including this proposal given the difficult gradient problem, the cost of land acquisition and especially if Dowling Street is to be developed as the by-pass to Shoal Bay and Fingal Bay.
8. (18) Page 20 D : The viability of the proposed continuation of Dowling Street via Magnus Street North was seriously questioned given the difficult topography, the loss of magnificent trees to widen the road, the challenging intersection with Shoal Bay Road and above all the recent major reconstruction of Trafalgar Street.
9. Page 25 “Parking Options”: The suitability of the proposed site for underground parking of up to 300 cars at Yacaaba North in the reserve is questioned. This would be a very expensive solution and would bring significant traffic into the roundabout which would have an additional entry from the Yacaaba street extension. Multi-decked parks at Donald Street East and West together with the major addition of parking under the Woolworths development would seem to be the better option. Reliance on these options would have the added benefit of encouraging pedestrian traffic bound for the foreshore through the retail precinct.
10. (23) Page 31 “Emergency Services”: The ambulance station has already relocated to Salamander Bay.
11. Page 35 last para. “Apex Park separates the town centre and the waterfront.....and comes as a major economic opportunity cost” : TRRA does not accept that this separation is anywhere as important as claimed. The interflow across Apex park is voluminous and with better pedestrian access, some more interest along the way and the extension of Yacaaba Street, the linkage can be optimised. Many harbourfront town centres have open space separating them from their waterfronts e.g. Cairns. This is usually identified as a major asset providing an opportunity for recreation and periodic displays and events.
12. The community is relieved to note that earlier proposals to fill this valuable space with 5 storey buildings have been abandoned.
13. (28) Page 36 “Investigate the extension of Fingal Street to Victoria Parade”: Whilst we have been advised that this was inserted at the request of Councillors, TRRA urges that the proposal be evaluated by engineers for its practicality given the very steep (almost a cliff) terrain and the difficulty with an intersection at Victoria Parade. We also query the sense of injecting more vehicular traffic into Victoria Parade at this location. (ie. what is the traffic management advantage of this proposal?)

To avoid contention and embarrassment, why not seek reconsideration of this by councillors before its inclusion in the final report.

14. (29) Page 38 “Creation of Dynamic and Adaptable Buildings”: TRRA supports this requirement inside the potential commercial precinct of the town centre and supports the imposition of standards on residential buildings which ensure that they are of sufficient quality to attract permanent residents as well as short stay tourists.

All of the illustrations in pages 53-56 still show a ground floor which is 4.5 metres in height. This is prescribed to allow the flexibility for all future buildings to accommodate commercial land uses at some time in the future if the town’s retail/commercial function grows to that extent. Given the likely competition from Salamander Bay and Taylors Beach it is difficult to envisage this requirement will be necessary for all areas of the town centre. There are areas of Government Road, Tomaree, Donald and Church Streets which will almost certainly only ever be developed for residential purposes and to enforce this ground floor height would be ridiculous and even discourage developers. Other smaller scale boutique retail shops in the commercial precinct may also find this ceiling height excessive and not in keeping with the intimate nature of their businesses. Residential purchasers in the fringe areas would also demand an attractive landscaped frontage with some setback from the street.

TRRA urges more careful consideration of this provision and further consultation with retailers and developers.

15. (30) Page 39 “Strategic Principles”: Action 2 Spelling of Kurrara Hill needs checking.
Principle 10 Building Heights: This entire principle needs further consideration as the principle of heights not exceeding the escarpment or not intruding on views towards the surrounding hills are not consistent with some of the proposed heights throughout this section. For example the 8-10 storeys at the western end of the marina (for a boutique hotel) would significantly exceed the height of the escarpment and its vegetation behind it. Additionally the 12 storeys proposed at the rear of the Bowling Club would, in our view, intrude on the green backdrop of Kurrara Hill when viewed from the northern end of town or the Marina precinct. In this case the 7 storey limit agreed for the Landmark development was about the tolerable limit.

Attention is drawn to the **Outcome on Page 39 (30)**. We reiterate our previous comment that seems to blindly pursue the goal of intensification across the whole town centre without due regard to visual appearance, solar access or practicality in terms of “cheek by jowl” living.

An inspection of more recent residential developments, say in upper Tomaree Street, illustrates the merits of modest setbacks front and side which allow landscaping to relieve the concrete jungle ambience which would emerge from the proposed no setback rule. New tourist hotels would quite probably wish to create a sub-tropical ambience with setbacks, landscaping and even outdoor eating and drinking spaces.

16. (32) (33) Page 42 “Built Form”:

TRRA seriously questions whether it is wise to abandon some land use zoning within the town centre which recognises the differing needs and design constraints associated with those uses. Obviously main street retail has very different needs from residential on the fringes of town.

On page 42 reference is made to the retention of (Patrick Partners’) Mike Cullen to advise. His report should be referenced. This is followed by outcomes which would appear to be based on his advice. These are: “establish an **urban structure** and an **urban form** and an **urban character**”. These visions for our town are not described but the resulting proposals for intensification, full site coverage, and big city ambience (see examples page 55) were soundly rejected by the community and the Councillors.

17. (34) **Vision Statement Page 44** : TRRA provided sustainable planning with a copy of its vision for Nelson Bay which was summed up by Nigel Waters in his presentation to the 15 February Forum.

We do not believe that the Vision on page 44 addresses the community’s perceptions for the future of their town as expressed in earlier consultations or in the forums conducted by Ardent Leisure and Crown Lands.

Your attention is drawn to the New Zealand Queenstown 2009 Design Strategy which is based on a set of principles and a vision which would be very relevant to the setting of Nelson Bay. We share a bayside location nestled in an amphitheatre of higher ground. We also share a small harbour and an economy based on tourism. Queenstown is thriving as a tourist destination and its town centre is vital and has a sense of place . The population of the LGA grew by 34% 2001-2009.

Click here for link http://www.qldc.govt.nz/strategies_and_publications/category/612/file/3235/

Your attention is drawn to the Overview section of the Queenstown strategy which, in our view, has content which could be injected into the Vision for Nelson Bay or at least into a statement of objectives at the beginning of the strategy.

18.(40) Page 49 “Reference to Steve Thorn analysis”: This analysis drew upon unacceptable propositions taken from a Melbourne Docklands template. If it is to be cited there should be a full reference to the report of Urban Design. The claim on page 50 that figure 19 “outlines the results of the analysis” is not accurate as the proposals for Apex Park and the Marina precinct have not been adopted.

19.(45) Page 50: Suggest you check date of Council meeting.

20. (41) Page 51 Figure 19 “Building Heights”: TRRA acknowledges that this map now generally reflects the currently agreed principles. However, as pointed out in Point 15 above, the principles seem to have some internal inconsistencies which should be addressed prior to this figure being recommended for adoption as a basis for an LEP or DCP.

We are aware that Sustainable Planning has acknowledged the need to correct the area shaded for 3 storey development in the reserve west of the Paradiso building. (Now Lot 179 is to be shown as not for development).

21. Page 53 “Street Typologies”: Do these diagrams deliver the outcome proposed by David Crofts at the 11 October forum? Note comment in No. 14 re universal requirement for 4.2 metres ceiling height on ground floor.

22. (46) Page 54 “Building Setbacks”: If Councillors’ principle shown in green at the end of this page is accepted, together with David Croft’s proposals on solar performance, all of the text on this page must be removed as was proposed in the draft presented to the November Forum by Rebecca Connor. The photographic illustrations on page 55 would seem equally irrelevant if we are to discard big city canyoning templates.

23. Page 56 “Floor Space Ratios Strategy, second dot point”: FSRs appear to be a reliable control to ensure that the town is not overdeveloped into a concrete jungle with inferior privacy and solar efficiency. If they are to be abandoned there needs to be details of the proposed replacement controls which were briefly mentioned at the 15 February Forum.

23. (47) Page 57 “Colonades”: These are not considered appropriate for the Nelson Bay situation.

24. (48) Page 58 “Glazing in streetscapes”: Recent discussions with retailers indicate strong resistance to limiting their window display. We recommend discussion with actual retailers on this point.

25. (49) Page 59 “Roof treatments and Rear Carparking”: Issues raised in November submission are not addressed.

26. (51) Page 63 “Demographics”: Issues raised have not been addressed. Map and captions are too small in scale to be legible. The definitions are not linked to ABS statistical boundaries and now there are new and various definitions of Nelson Bay throughout this draft which need to be related to this map and the quoted statistics

27. (53) Pages 67-79 “View Analysis”: Previous comments still apply. There is no discussion of the scope to grant incentives for site amalgamation in exchange for variations in building heights.