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Local Strategic Planning Statement (LSPS): Submission

We welcome this document as an important layer in the strategic planning framework. We understand that it will replace the current PS Planning Strategy (PSPS) 2011.

Some of our comments are on the LSPS as a whole, while others relate specifically to the way it deals with the Tomaree Peninsula – our primary focus.

Context, and Our place in the region (pp 5-9)

Given the place of the LSPS within the NSW Strategic Planning hierarchy (Figure 1), we submit that there needs to be a clearer recognition that while all of the Port Stephens LGA is subject to the Hunter Regional Plan (HRP), only the western part falls within the Greater Newcastle Metropolitan Plan (GNMP) area.

This distinction has significant implications for land use planning because more growth (of employment and population) is forecast and can be expected for areas of the LGA within commuting distance of Newcastle and which contain major employment hubs at Heatherbrae, Tomago and Williamstown (catalyst areas in the GNMP). Our comments on this distinction are expanded in our submission on the draft Housing Strategy (Live Port Stephens) on exhibition alongside the LSPS.

While the Tomaree peninsula is a major contributor to the regional visitor economy (recognised on p7), this does not necessarily translate into future growth, particularly in view of the many environmental factors that are both constraints (limited developable land) but also the foundation of the area's tourism appeal.

Figure 3 identifies Salamander Bay and Anna Bay as 'Local centres', although there are other subsidiary centres on the peninsula – Soldiers Point, Old Salamander, Shoal Bay and Fingal Bay, which play an important role for both local residents and visitors, and a growing commercial zone at Taylors Beach.

We submit that it is important to expressly clarify the relationship between Nelson Bay and Salamander Bay and their places in the urban hierarchy. This is because of the long running tension between the two in terms of their respective roles – compounded by Council's conflict of interest as the major landholder at Salamander Bay, which also enjoys the advantage of large amounts of free parking. This could be addressed under Planning Priority 1 (see below).



We strongly believe that the major retail centre at Salamander Bay, and the Taylors Beach commercial precinct should continue to serve distinct and limited purposes, and that the primacy of Nelson Bay as the only Strategic Centre on the Tomaree Peninsula (HRP) with a full range of both local and tourist services must be protected and encouraged.

On p8 there is a reference to 'an underwater marine oasis at Tomaree'. If this is intended as a synonym for the Great Lakes-Port Stephens Marine Park we suggest it does not do it justice – the Marine Park is a major asset that extends well beyond Tomaree and should be referenced by its full name (as it is on p15).

Port Stephens 2040: A Vision (p10)

We support the vision as set out in the LSPS, although it is at such a general 'high level' that no-one is likely to contest it. We note that it does not automatically assume major growth. We draw attention in particular to the third paragraph which we submit creates an imperative for protecting the natural environment and local character of the Tomaree peninsula in particular, given its importance as a tourist destination.

Planning Priorities (p11)

We generally support the 12 identified Priorities but submit that the overall support for 'growth' should be more qualified, and as already suggested, should distinguish those parts of the LGA that need to be planned in the context of the Newcastle metro area and major employment hubs, and those in the east (Tomaree and Tilligerry peninsulas) where the balance between the priorities should be different.

Ecologically sustainable development (ESD) is recognised as a key commitment within Priority 8, which relates specifically to hazards and climate change, and is framed in the limited context of improving resilience, and not in the wider sense of underpinning decisions about the amount and type of growth that can be accommodated. As we did for the Community Strategic Plan (CSP) adopted in 2018, we again submit that ESD should be elevated to an overarching principle that applies across all 12 Priorities in the LSPS – it not just about the environment.

The structure of the rest of the LSPS is somewhat odd in that each of the four sections (Economy, Housing, Environment and Transport) has a list of actions – some broad and some specific, under a heading 'Council will...' but then a table of very specific 'Actions' which are curiously selective. While such a list cannot be exhaustive, we submit that presentation could be improved by either combining the 'Council will:' list with the 'Actions' or establishing a clearer hierarchy with broad actions and then specific examples. One option would be a list of continuous or ongoing actions and a separate list of actions that will have a defined due date.

Economy

We recognise the significant potential for new employment opportunities in the western part of the LGA within the GNMP area. We generally support the Priorities and Actions under this heading, but submit that they should be qualified by an overarching ESD principle – if Council is serious about addressing climate change and other environmental and social challenges, all economic development initiatives must be 'screened' for sustainability. We welcome the reference to sustainable built environments in Action 6.3.

While we support the encouragement and support for the tourist economy in the eastern part of the LGA, particularly Tomaree, we submit that the emphasis should be on quality rather than quantitative growth – the area must retain its 'unique selling point' of natural environment and local character which gives it a competitive advantage over other coastal tourist towns. Priority 2 (Make

business growth easier) must not be allowed to lead to a lowering of development standards and controls.

Tourism

We support the development of a major hotel and conference facility in the LGA, once again providing it satisfies ESD principles and is in an appropriate location and of high quality design.

TRRA have for a long time been very concerned about the visual appearance of the sole access route to the Tomaree peninsula along Nelson Bay Road. A review of this as part of Action 3.3 would be welcome and we submit that the overarching objective of any 'access corridor' land use review must be to protect the predominantly rural nature of the landscape..

Housing

As with Economy, we submit that an overarching ESD principle apply to Housing.

The three Housing Priorities in the LSPS should logically lead to the 4 Outcomes in the draft Housing Strategy. Outcome 2 (Affordability) expands on consideration of this issue within Priority 4 of the LSPS (Land supply). While Priorities 4 & 5 are directly reflected in Outcomes 1 & 3 of the Housing Strategy, Priority 6 (Infrastructure) is only partially reflected in Outcome 4 (Liveability) in the Strategy. We submit that the Housing Strategy Outcomes and LSPS Housing Priorities could usefully be more closely aligned.

We refer to the more detailed comments in our separate submission on the draft Housing Strategy. Our overall contention is that the LGA can accommodate likely demand for new housing without substantial relaxation of planning controls, particularly in Tomaree. Other levers can and should be pulled to improve housing diversity and affordability without sacrificing precious amenity and natural environment/biodiversity.

In relation to Action 5.1, we note that TRRA has consistently opposed the proposed increase in building height limits for Nelson Bay Town Centre included in the adopted 'Nelson Bay Delivery Program'. We note that these and related changes to the LEP have yet to be made, with a final round of public consultation to take place after Gateway approval from the DPIE. We will continue to campaign for lower height limits at least until this process is complete, and therefore also object to Action 5.1 insofar as it relates to those specific changes.

We strongly support Planning Priority 6: *Plan Infrastructure to support communities*. This Priority should apply not just to Housing but to Business and other developments. There should be greater co-ordination of housing and other development approvals with infrastructure provision – we have observed over many years that DAs are approved that place additional demands on stormwater and sewerage, roads etc, with infrastructure being upgraded only later if at all. This has led to cumulative overloading of some important infrastructure.

Environment

We support both the general commitments, including to ESD, and the 4 Planning Priorities under this heading, and welcome the specific actions listed, which are consistent with Strategies 12-15 in the GNMP.

As noted above, ESD should be about more than just resilience to hazards and climate change – rather an overarching principle applying to all Planning Priorities.

We understand that Council is bringing forward the review of its Climate Change Adaptation Plan and the revised target date should be adjusted in Action 8.1.

In relation to Action 9.1, we refer to our separate submission on the draft Housing Strategy.

We submit that Action 9.2 should not extend to encouraging major developments on rural land. Port Stephens Council has a poor track record of approving inappropriate developments on rural land – condoning the stretching of permitted uses. One example is the approval of multiple ‘caravan parks’ or ‘tourist facilities’ on rural zoned land that quickly morph into fully fledged residential subdivisions or large scale resorts, clearly breaching the zone objective of ‘maintaining the rural landscape character’ (multiple examples in the Anna Bay/Bobs Farm area). ‘Niche’ activities favoured by Action 9.2 should be confined to small scale developments that do not fundamentally detract from rural character. If major developments are proposed for rural land they should be preceded by a full rezoning proposal.

Transport

As with Economy and Housing, we submit that an overarching ESD principle apply to Transport.

We support the 2 Planning Priorities for transport and the associated aims and Actions, but make a few observations:

Improved connectivity is essential to reducing car dependence – people will not walk or cycle, or catch public transport, if they face obstacles in the form of missing or poorly maintained links. Filling small gaps in pathways should be given priority over expensive new links.

Pathways must be suitable for use by those with reduced mobility, including people pushing strollers or shopping trolleys, so that they are not excluded or disadvantaged.

The Strategy could usefully expressly encourage innovative forms of public transport, such as shuttles and smaller ‘on-demand’ buses, particularly in areas of high tourist visitation where seasonal peaks may not justify spending on new roads and parking.

Council should be cautious about relaxing parking requirements for new housing and commercial developments – while we support encouraging people to consider living with fewer (or no) cars, this is unlikely to be realistic for most areas of Port Stephens where access to, and provision for, private vehicles will remain important in the short to medium term. Visions of communities with shared driverless vehicles and much lower levels of car ownership are more realistic for metropolitan areas rather than the highly dispersed and rural communities of our LGA.

Implementation and Monitoring

There is a reference to CPs in the first paragraph – we understand that this refers to Local Infrastructure Contribution Plans – this should be made clear.

We welcome the commitment to work with Community Groups, amongst other organisations, in the implementation of the LSPS.

ends.