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Greater Cities Commission

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Submission on the Six Cities Region Discussion Paper

About TRRA

The Tomaree Ratepayers and Residents Association Inc (TRRA) 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.

Submission

As usual with high level strategic planning documents, most of the content is uncontentious – multiple aims and objectives with which most people will agree. The devil is always in the detail of how the strategies are actually implemented, and in particular how the inevitably competing pressures are resolved – which objectives are actually given priority, both in policy and in funding.

While we welcome the acknowledgement of climate change and environmental protection, we submit that the Discussion Paper does not give sufficient weight to emissions reduction, climate adaptation and biodiversity conservation, relative to development. We also submit that the welcome encouragement of specific actions such as increasing urban tree canopy and increasing building resilience (p58) is currently being undermined by contradictory State government policies such as the withdrawal of the Design & Place SEPP, encouragement of land clearing, and lax compliance monitoring and enforcement.

We submit that there is insufficient justification given for the chosen boundaries of the overall six cities region and of the six cities themselves, which seem to be largely just a convenient but arbitrary adoption of entire local government areas (LGAs). In our local circumstances, this is unfortunate, confirming a recent trend to see the whole of Port Stephens as part of a Greater Newcastle Metropolitan area. This leads to a 'one size fits all' approach to planning within the LGA, and stands in contrast to the more nuanced (and preferable) approach previously taken in the regional planning for the Hunter.

In the Hunter Regional Plan 2036 (and draft 2041 update) and in the Greater Newcastle Metropolitan Plan, a clear distinction was made between the parts of Port Stephens LGA which are clearly functionally closely related to Newcastle (Fern Bay, Raymond Terrace, Tomago, Williamtown, Saltash and Medowie) and two other parts – the rural west and the Tilligerry and Tomaree peninsulas in the east. The former was correctly identified as part of a rural hinterland district while the latter peninsulas were seen as part of a 'coastal' district extending north towards Taree. Both of these districts have very different relationship to the metropolitan area, with different economies,



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pressures and needs. We submit that these differences should still be recognised, with a formal distinction made between these geographical areas.

We are concerned that the introduction of an overarching regional strategic planning framework for the Lower Hunter and Greater Newcastle City will be used by the State Government to impose its priorities on local councils, compounding the already regrettable over-use of SEPPs to override Local Environmental Plans.

We are also concerned that an overriding objective appears to be delivery of State Government housing targets, which in some cases have yet to be quantified, or justified. While we acknowledge that housing supply, in particular of affordable housing, is a major challenge, we fear that local Councils will either choose, or feel pressured into, revised housing strategies which lead to further land clearing (with unacceptable loss of native vegetation, habitat and biodiversity) and to high-rise apartment developments in inappropriate locations, forever damaging the character of many areas.

We strongly believe that reasonable population growth can and should be accommodated mostly through modest but widespread increases in density in existing developed areas and on brownfield sites, including encouragement of alternative housing styles, and more medium-rise mixed-use developments. The contribution of greenfield development to meeting housing targets for Port Stephens will be limited for very good environmental reasons – the suitability of land at Wallalong for major development has always been highly questionable and should not be given any oxygen, while even some of the land rezoned at Kings Hill may no longer be available, subject to the outcome of the current appeal against the refusal of the DA in early 2022 by the Regional Planning Panel. Targets for residential approvals for Port Stephens may need to be revised downwards in light of the many environmental constraints in the LGA.

We note the emphasis on larger scale mixed use developments being suited to strategic centres proximate to transport hubs (pp40-42), and observe that in the case of the Tomaree peninsula, Nelson Bay is identified as a strategic centre but is not and can never be expected to be a transport hub in the sense that is envisaged in the Paper. The potential for significant growth in the residential population of the Tomaree and Tilligerry peninsulas will always be severely constrained by their geography, prevalence of flood prone land, large areas of protected conservation land, and limited transport and social infrastructure, and this should be expressly recognised.

We welcome the priority given to provision of more social and affordable housing, but submit that this is not just a land supply issue – properly addressing the lack of affordable rental housing in particular requires a multi-faceted and multi-agency government response by all levels of government, including tax reform, and much greater direct investment in social housing than has so far been promised. The under-utilisation of existing housing stock, exacerbated in tourist areas of Port Stephens by increases in short term holiday rental accommodation, must be addressed by the State and Local Government working together.

We welcome the recognition of the potential for employment growth based on renewable energy and other climate action related industries being particularly strong in the Hunter, including Port Stephens, and acknowledge the significant potential for defence and aerospace related employment in the area around the Williamstown RAAF Base and civil airport, provided the legacy issue of PFAS contamination can be adequately addressed – progress on this since the problem was acknowledged in 2015 has been too slow to date.

We submit that there should be greater recognition of the major issues surrounding quarrying and its relationship to demand for construction materials. This is a particular concern in Port Stephens, where the major existing and proposed sand-mining in the SW of the LGA, and hard rock quarrying in the NW, has major implications for heavy traffic on overloaded roads, for loss of native vegetation and wildlife habitat, and for groundwater quality.

We hope you will take the above concerns into account in developing the overall strategic planning framework for the Six Cities Region, and in subsequent City Planning for each of the six cities. Our specific concerns about Port Stephens need to be addressed in the City Plan for the Lower Hunter and Greater Newcastle City.

We have no objection to this submission being published in full and unredacted.

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