LIVEABLE COMMUNITIES

ATTACHMENT A

DRAFT HUNTER REGIONAL PLAN – MIDCOAST COUNCIL SUBMISSION

ORDINARY MEETING

23 FEBRUARY 2022

MIDCOAST council

ATTACHMENT A

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 Districthowever, 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/land-owner 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.

MIDCOAST council

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COMMENTS ON THE HUNTER REGIONAL PLAN		
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.

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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.

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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 development proposal to rectify the situation • **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"	Specific comments relate to: • **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 200m^2 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'

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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"

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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 and 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

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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 under "**Rural towns and villages**" as they don't have traditional town centres – need to state that these areas have opportunities to expand as identified in our Urban Release Areas Report 2021

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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" – 3rd 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**: – 3rd paragraph, 1st 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 than changing the zone • **Health care precincts:** – Last sentence- add Bulahdelah given it has a hospital • **New section – environmental landscapes**: This district is dominated by the national parks, rural lands and environmental lands. A new section needs to be included to discuss the environmental landscapes and the important connections they provide from the mountains to the coast. We need to protect and enhance these environmental landscapes
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 – add "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. Environmental corridors** (replace above): – new dot point - the Manning River, Dawson River and Browns Creek provide important ecological corridors to urban bushland and opportunities for important pedestrian/cycle connections • **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.

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		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.
114-117	Coastal District	• **Figure 28** – amend to show: – 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, 1st sentence – reword to "Walking is a popular activity for locals and attracts tourists" – 1st paragraph, 2nd sentence – correct the spelling for "Khappinghat" • **Bushfire risk and Coastal environments:** – these hazards apply across the Hunter and should be listed in the relevant Districts – potentially combine these hazards and reduce the emphasis – need to include other aquaculture activities - fishing, lobster and prawn industries

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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
	Forster – Tuncurry Growth Area	• **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 (new section under Regionally Significant Growth Areas)	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. **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