

# **Correct Planning & Consultation for Mayfield Group (CPCFM)**

## **Submission**

### **Draft Hunter Regional Plan, and Draft Plan for Growing Hunter City**

Correct Planning & Consultation for Mayfield Group was established in 2010, and has about 500 members and supporters.

1. We have particular concerns around the non complying transport of coal by rail from the Hunter and other nearby mines to the Newcastle Port.

These concerns have been identified to the EPA, following formal complaints by CPCFM, and the provision by us of hundreds of photos; showing non compliance by Coal Mine loaders, Rail Hauliers, and Coal Unloaders, who are all contributing to this problem.

The non complying transport of coal results in coal falling off and out of Coal wagons; resulting in Polluting Coal - from large lumps of coal, and coarse, and fine to very fine coal particles, being dumped in the Coal Train Corridor.

It breaks down over time, and in fine form is recirculated to the air by passing trains.

It also drains away, after rain, into culverts, and then into streams and creeks; and eventually into the Hunter River.

We have proposed solutions to the EPA, the Australian Rail Track Corporation, and Transport for NSW. This includes modifications to the regulatory arrangements and the construction of a "Train Checking Facility".

We have also provided very substantial material, and proposed solutions, to the NSW Chief Scientist and Engineer.

These solutions need to be implemented by the Coal Industry; and enforcement needs to be done by government agencies – principally the EPA.

This work must be carried out if the proposed Hunter City area is to have a sound and healthy area for accommodating population and industry growth.

2. Attached is a chart comparing the seriousness of the Williamtown Airport Chemical pollution issues, with those of the coal corridor Pollution issues.

We are also concerned about the following issues – Numbered 3 to 13:

3. Having regional and Hunter City boundaries that are practical and fit in with the topography, existing and proposed development; and which meet the needs of the community and service provider. What is displayed is not nearly good enough.
4. Taking into account the electoral boundaries, so that local politicians can serve one community. What is displayed is not nearly good enough.

5. Providing for major rail infrastructure including:

- The Port Side Rail Line proposal.

This will take 25M Tonnes pa of coal -destined to the Carrington Coal Terminal, out of dense residential Suburbs of inner City Newcastle; and instead take the coal along sparsely populated riverfront land.

- The removal of heavy freight rail from residential areas
- The Newcastle freight rail bypass
- The connection of the inland rail line to the Port of Newcastle

6. The Port of Newcastle has announced, as recently as this week at a Community Liaison Group meeting, its aspirations to take ship movements in the Port from aprox. 4,000 pa. to 10,000 pa.

Therefore, what is needed is a MAJOR UPGRADE in RAIL Capacity, to and from the PORT, to cope with a more than trebling of Freight resulting from these increased ship movements.

The preservation NOW of an easement for the Portside Rail proposal is therefore URGENT; and a start on setting aside funding for its construction also needs to begin NOW.

CPCFM can provide more details.

7. The development of a suburban rail passenger network to cover the Hunter City area.

8. The linking of Newcastle Airport with frequent and passenger friendly timetabled Public Transport to Newcastle, and other areas.

9. Industrial areas and work places should be established within easy reach of staff from their homes by fast and efficient high frequency public transport.

10. There needs to be a sound and efficient school and education sub plan within the Hunter City proposal.

11. There needs to be a sound and efficient health and hospital sub plan within the Hunter City proposal. The Plan should include a new major regional hospital (about twice the size of John Hunter) and medical precinct located in the Hunter City Boundary.

12. CPCFM is troubled by the statistical package that is incorporated within the document.

Either the Newcastle Revitalisation data is incorrect or the Hunter City data is incorrect. They cannot be both correct.

13. CPCFM was disappointed that the community consultation for this major proposal was almost non existent.

14. We also support the work done by many other groups in developing submissions on this Draft Hunter Plan.

We will not reword those submissions, but will use some and highlight - by colour and or underlining, those areas where we have particular concerns

## **OVERARCHING ISSUES as identified by other groups, with which CPCFM agrees**

- **Failure to provide adequate protection for the environment**

Although the draft Plan identifies areas of high environmental value (Figure 11: High Environmental Values, p 46), it does not provide adequate protection for those areas (e.g. no-go zones and/or clear restrictions on impacting development). The Plan must clearly outline mechanisms for protecting or enhancing areas of high environmental value.

- **Failure to resolve land use conflicts**

The draft Plan identifies a range of land use values including areas of high environmental value (Figure 11: High Environmental Values, p 46); Primary Industries (including Biophysical Strategic Agricultural Land, Equine Critical Industry Cluster and Viticultural Critical Industry Cluster) (Figure 9: Selected Primary Industries, p30-31); and identified and potential mineral resources (Figures 5 - 8). However the draft Plan fails to resolve conflicts between these various uses and defers important strategic planning and impact management to a later stage.

- **Heavy reliance on biodiversity offsetting**

The draft Plan places too high an emphasis on biodiversity offsetting. Biodiversity offsetting is not appropriate in all circumstances. The draft Plan must identify 'red flag' areas (e.g. coastal catchments, areas of endangered ecological communities or threatened species habitat) that are not appropriate for biodiversity offsetting. If biodiversity offsetting is to occur, it must meet best practice principles that require 'like for like' offsets and no net loss of biodiversity.

- **Habitat connectivity**

The draft Plan identifies focus areas for sustaining regional habitat connectivity (Figure 12, p 52-53), however it relies heavily on private investment, mine rehabilitation and offsetting for maintaining habitat connectivity. These mechanisms should complement (not replace) clear protections for habitat connectivity and the protection of important wildlife corridors.

- **Failure to link catchment management planning and natural resource management**

The draft Plan fails to adequately integrate catchment management planning. It makes no reference to existing Catchment Action Plans (e.g. [Hunter-Central Rivers Catchment Action Plan](#)), or the goals and objectives within those plans.

- **Climate Change**

The draft Plan fails to adequately plan for climate change adaptation and mitigation. The only clear action in the plan is for the State Government to continue to support councils to consider the long term implications of climate change in decision-making. There should be more emphasis in the document on climate change risks as a constraint on development. The State Government has a responsibility to the community to map areas that will be impacted adversely by climate change and protect appropriate development controls for those areas. This is particularly important for floodplains, low lying coastal areas and high bushfire risk areas.

- **Protection of Drinking Water Catchments**

There are a number of drinking water catchments identified in the Hunter region (Figure 14). In order to provide adequate protection for these areas all coal seam gas and long wall coal mining activities should be banned within the drinking water catchments.

The requirement that any development should have neutral or beneficial effect on the region's water quality must be established in law (c.f. State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011).

- **Air pollution control**

The Draft Regional Plan asserts that the NSW Government "already closely manages the mining industry" through pollution reduction programs, requiring 'best practice' pollution control and requiring strategies to control blast fumes from open cut coal mines (Action 2.4.4 p.41-43). There are NO proposed measures to strengthen air pollution control.

In reality, open cut coal mines routinely expose community members to blast fumes and concentrations of particle pollution exceeding national standards.

Emissions from coal mines have doubled in the last 5 years.

The Regional Plan must include measures to control air pollution that include prosecution for pollution events and rejecting applications for new pollution sources

(e.g. expanded and new coal mines), where air pollution concentrations already exceed national standards.

- **Transition from fossil fuel industry**

The draft Plan identifies coal mining as an ongoing priority industry for the Hunter region.

In light of the unequivocal evidence that the burning of coal contributes to anthropogenic climate change, and international agreement to keep global average temperatures to below 2 degrees Celsius, there needs to be greater emphasis on transitioning away from fossil fuels.

Research from the University College of London indicates that over 90% of Australasian coal reserves would have to remain unburnt before 2050 to meet the 2 degrees C warming ceiling.

The Hunter Regional Plan should prioritise a diverse economy that helps the region transition from the fossil fuel industry into new industries, including, for example, renewable energy.

- **Accessibility and public transport**

The current transport system in the Hunter region is highly car dependant, and has been significantly affected by the closure of the Newcastle rail line. The fragmented structure of the Hunter City makes it even more difficult to support a sustainable transport system. The regional Plan should better identify opportunities for improving public transport system in the Hunter region.

### **Ability for local councils to effectively deliver the plan**

The draft Plan relies on ongoing implementation by 11 local councils, working with the NSW Government.

Appropriate oversight is needed to ensure that the relevant local councils are acting consistently in order to implement the Plan.

Further, the draft Regional Plan was prepared without regard to the proposed local council amalgamations. If amalgamations go ahead, this could impact on the short term capacity of the newly amalgamated LGAs to deliver on the draft Plan.

## **SPECIFIC ADDITIONAL MATTERS TO BE CONSIDERED**

- More emphasis on the transition to a zero carbon economy means a greater emphasis on rail transport in and through the Hunter.

- Hunter Environment Lobby's proposed Hunter Link Rail provides a climate change proof route through the Hunter using the Cockle Creek – Kurri Kurri – Maitland route, using old mining rail corridors. This fits in with a high speed rail freight and passenger link from Melbourne to Brisbane – for details email [helobby@gmail.com](mailto:helobby@gmail.com)
- Water catchment pollution, e.g. firefighting pollution at Williamtown needs specific treatment to guard against pollution of aquifers in Tomago, Tomaree and Stockton sand beds – Water Sharing Plan for that region on exhibition now til 22.2.16;

And to protect Oyster Farmers, and the Fishing Industry

- Final void issues for all coal mining and other heavy metal extractive industries need special plans for the future.

Leaving the outcomes in the hands of the vagaries of market forces means a potential disaster for land management.

- Limits to growth are appropriate for the Hunter. Areas that have dwindling biodiversity values and dwindling supply of agricultural land need to be protected.
- Coal mining growth needs to be reined in as its impacts on salt and heavy metal loads in the Hunter are increasingly impacting on types of crops being able to be grown.
- Public accountability of all agencies impacting on the Hunter needs be increased, not decreased, as trends show in the Hunter.

John L Hayes

24<sup>th</sup> March 2016

Convenor

Correct Planning and Consultation for Mayfield group (CPCFM)\*\*

email: [jlhayes@bigpond.com](mailto:jlhayes@bigpond.com)

Phn. 4967 3013 Mob 0400 171 602

117 INGALL ST

MAYFIELD EAST NSW 2304

**\*\* CPCFM was established in 2010, and has about 500 members and supporters**