

22.03.16

General Manager,
Hunter & Central Coast
Dept of Planning & Environment

Dear Sir/Madam,

RE: DRAFT HUNTER REGIONAL PLAN AND DRAFT PLAN FOR GROWING HUNTER CITY

I am writing to tell you what I think of the Draft Hunter Regional Plan (DHRP) and Draft Plan for Growing Hunter City (DPFGHC) currently on public exhibition. Will "having my say" help to ensure things are planned better for the next 20 years? I would like to think so, but (as I have said previously) past experiences of the Planning system and the current Plans on exhibition give me grave concerns. What assurance do we have that deals won't be done behind closed doors after public input, as happened last time, with the Lower Hunter Regional Strategy?

I am a resident of Buttai, approximately 7km from the roundabout at the end of the M1 Motorway. I moved to a peaceful rural area 23 years ago, just half an hour from Newcastle. I now have an open cut coal mine across the road, a large quarry behind me, an exploration license over our property, a mine under the local school, now get woken every morning at 5.00am by the commuter traffic still heading to the mines up the valley and take anything up to 1hr 15 min to travel the 30km into Newcastle during "peak hour" in the morning. Despite this constant onslaught, the things I like about living at Buttai include the following:

- The rural setting at the northern end of the Sugarloaf Range
- The native birds and animals - even the goannas, which set off every bird as they climb trees looking for eggs, the microbats that dip quickly into the pool at dusk, the rainbow bee eaters that pass through, the flying foxes when they come for the ironbark blossom, the kangaroos and wallabies that share our garden, the three tawny frogmouths that sit in a row every day, pretending they can't see me etc
- The native vegetation including the tiny orchids and tetraetheca juncea, which come out of nowhere, flower and disappear and the mighty ironbarks
- The strong sense of community where people turn out to Council meetings to make their feelings known, deliver frozen meals to accident victims, regularly car pool to the cinema, meet weekly for tai chi, and phone anyone who is missing to check they're ok
- The convenience of being "half an hour from everywhere" (except during peak hour!) – mother and sister in Newcastle, job in Pokolbin, airport, Bar Beach, Lake Mac parkrun, Morisset Station etc
- Proximity to Black Hill Public School, with its science cave, carcass corner for found treasures, a Stephanie Alexander kitchen garden program, sport program specialising in skipping and percussion for music, because "everyone can do that", celebration of 125 years with 3 days of festivities raising thousands of dollars in a school with 60 kids

In relation to my area – the northern Sugarloaf Range - the community is currently trying to fight off a spot rezoning by the Catholic Diocese of Maitland and Newcastle of 300Ha adjacent to the Coal & Allied site on the corner of the M1 and John Renshaw Drive. This is the latest in a long list of undesirable developments proposed for our area eg a building and construction waste dump, a putrescible waste dump for Sydney's garbage, a quarry haul route through our valley etc, all of which have been fought off by the concerted efforts of the local community. I offer the following specific comments:

- I note with relief that the land between John Renshaw Drive and Blackhill Rd is no longer marked as “employment land”** as it was in the final Lower Hunter Regional Strategy - see DHRP Fig 4 and, indeed, all figures throughout the HDRP and the DPFGHC, where only the Coal & Allied block on the corner of the M1 and John Renshaw Drive is identified as “urban area”. The rest of this area should all be retained as rural/conservation land, as it is already partially preserved in the Donaldson Bushland Conservation Area and is at the pinch point in the Watagan to Stockton habitat corridor (see heat map from OEH pg 41 DPFGHC). **I do not want to see it flip back to “employment land” in the final Hunter Regional Plan after lobbying from powerful landowners, as happened last time, between the “Draft” and “Final” Lower Hunter Regional Strategy.**
- There is no need for further industrial development in Black Hill.** The Coal & Allied block at the corner of the M1 and John Renshaw Drive is more than enough industrial land in Black Hill. This development is only (barely) acceptable due to the large amount of land in the Sugarloaf Range that Coal & Allied gave in exchange to the State Government for conservation, as an essential part of the Watagan-Stockton habitat corridor. Also, the C&A development doesn't stretch all the way through to Blackhill Rd, so will impact, but not destroy, the rural amenity of the Black Hill community. Further industrial development in this area is inconsistent with *ACTION 3.1.2 Identify priority investment within regional habitat corridors and prepare local strategies to protect and manage corridors*, given it's at the pinch point in the Watagan-Stockton habitat corridor. **Identifying this “priority investment within regional habitat corridors” needs to be done as a matter of urgency, before the corridors are destroyed!**
- The Thornton-Killingworth Sub-Regional Strategy in 2003 concluded that **“large new settlements to the Eastern edge of Cessnock LGA would be difficult because of issues relating to isolation and servicing”**. Nothing's changed in Black Hill: no town water, no sewerage, dicky power supply, constant phone outages and dodgy mobile/internet coverage! The Plan pg 35 says:
The NSW Government will:
 - work with councils and servicing agencies to prioritise infrastructure planning and delivery for industrial lands.*

If this had been in place at the time, the C&A development would never have been progressed! Hunter Water have advised there are currently no plans to locate a new wastewater treatment plant closer to the Black Hill area, so a new main to the Morpeth Waste Water Treatment Plant would be required. This area is expensive to service due to its isolation and there is no prospect of recovering the cost due to the conservation lands constraining further development. The C&A block has been on the market for some time but no developers are interested. **Isolated and constrained sites such as this should not be a priority for infrastructure planning or delivery now, and perhaps not in the future either.**

- **There is more than enough employment land already zoned and serviced, without rezoning more at Black Hill.** According to the draft Hunter Regional Plan pg 34 *“The region has around **15000 hectares** of land zoned for employment purposes. Approximately **7400 hectares** are estimated to be **suitable** for industrial use.”* Rezoning land unnecessarily just leaves it sitting idle, like the Hunter Economic Zone (HEZ), further west near Pelaw Main, attracting large-scale illegal dumpers and other undesirable activities. **The system for rezoning land to Industrial is broken and out of control, locking up land from other more beneficial uses.** The Draft HRP includes:

ACTION 2.2.3 Identify and manage the supply of industrial lands to support manufacturing, construction, transport and supply chain industries and under that:

A strategic approach is needed to improve monitoring of the industrial land supply, and specifically servicing, development of, and projections estimating when new industrial land will be required and where it should be located.

Bring it on! Urgently! Planning needs to implement a moratorium on spot rezonings until the system is in place. Until the proposed actions are implemented, we just have a system of developers pushing through spot rezonings for private profit and no benefit to the community.

- **The Draft Hunter Regional Plan fails to identify the Kurri Smelter site, which has been used for industrial purposes for the last 50 years.** The Plan says the NSW Government will (Pg 35): *investigate opportunities for new industrial locations, prioritising locations that have good access to the Hunter's inter-regional transport network, such as the Hunter Expressway corridor;* Surely the Kurri Smelter site should be a top priority for industrial development ahead of “new” greenfield, unserviced sites? It already has an on/off ramp to the south from the Hunter Expressway. It is unfathomable that this site does not feature as a priority for redevelopment in the 20 year span of the DHRP. **The NSW Government needs to put this site to the top of its priority list for industrial locations to create jobs in the Cessnock LGA.**
- The Kurri Smelter site would be an ideal place for a Renewable Energy Industry cluster. As coal mining wanes, a new industry is required to take its place as a major employer in the Coalfields area. The Hunter has always been the State's main energy provider, we just need to get serious about doing it without coal in the long term. It may not happen in the 20yr life of this Plan, but surely **this Plan needs to recognise the need to support renewable energy in the Hunter, as a source of energy AND jobs.**
- I support **Goal 3: Protect and connect natural environments** and **Direction 3.1 Protect the natural environment and biodiversity** and

ACTION 3.1.1 Improve the quality of and access to information relating to high environmental values and use this information to avoid, minimise and mitigate the impacts of development on significant environmental assets and DPFHC pg40 under

DIRECTION 6.1 Address Hunter's national pinch point to strengthen habitat connectivity and transport efficiency:

Planning for transport corridors will take into account the need to conserve and restore biodiversity, and particularly the regional objective of strengthening habitat connectivity across the Watagans–Stockton link. Recent modelling has identified this area as an existing pinch point for habitat connectivity and also DPFHC pg 40, under :

ACTION 6.1.1 *Develop a framework to balance competing interests and deliver conservation, transport and land use planning objectives*

The NSW Government will:

- work with councils to identify preferred habitat corridors and priorities for investing in conservation to sustain habitat connectivity across this area; and
- work in partnership with councils and the community to develop an integrated management plan for the area that reflects a balanced approach to environmental, transport and economic issues.

I am concerned, however, that all of these encouraging words will not, in fact, stop development and further loss of habitat in the Watagan-Stockton habitat corridor. There is no viable alternative to this corridor for wildlife, so **the NSW Government needs to bite the bullet and declare the Watagan-Stockton habitat corridor off-limits to further development.**

- There seems to be an over reliance on “off-setting” as the answer to all biodiversity and habitat corridor issues. The DHRP pg 51 says:

The NSW Government will aim to, in the case of:

- Jilliby-Wallarah Peninsula and **Watagans-Stockton** links, conserve habitat and enhance connectivity through the sensitive design and management of biodiversity offsets to deliver new release areas and transport corridors;

It is often difficult to find “like-for-like” land to offset. If it is not in the immediate vicinity, it does nothing for connectivity and the survival of the current fauna and flora populations. There is also an obvious limitation: if you require a 2:1 ratio of offset to clearing, only one third of any endangered ecological community can be removed – then the system fails, there is nowhere left to offset. Unfortunately, the coal industry has further undermined the community's confidence in off-setting, by applying to mine their previous offset land! **The Government needs to strengthen the “in perpetuity” part of the off-setting process and also determine how these lands are to be sustainably managed in perpetuity.**

- The DPFHC pg 40 also says:

The national freight network and the Hunter's transport gateways are also driving demand for new manufacturing and logistics activities that support the Hunter region's resource industries. This is reflected in the growth of industrial lands at Hexham, Thornton, Beresfield and, more recently, Black Hill.

I would dispute this statement in relation to Black Hill. The only reason we have been foisted with an industrial development on the Coal & Allied site is “payback” for them handing over an additional 500 hectares of land for conservation in the Watagan-Stockton habitat corridor to the State Government. Had this piece of land not been owned by Coal & Allied, I doubt very much whether it would now be rezoned industrial.

- The Plan is deficient in detail in relation to any future freight rail by-pass corridor and its impact on the Black Hill area. Does this just mean that it is not even on the horizon for the next 20 years? Nonetheless **the proposed corridor needs to be identified now, taking into account the immovable nature of the Watagan-Stockton habitat corridor.**
- It is disappointing to see no mention of the Richmond Vale Rail Trail in the Plan. This has the potential to be an amazing tourist drawcard, showcasing the history of the coal industry and the natural beauty and wildlife of the Sugarloaf area in the Watagan-Stockton habitat corridor.

ACTION 2.2.2 Develop strategies
for enhancing tourism infrastructure
to increase national competitiveness and

- investigate options to accommodate a more diverse range of economic uses in natural areas to support tourism and conservation.

If you give people access to this area, they will value it and use it, locals and tourists alike, just as they do Blackbutt Reserve, the Bathers Way and the Fernleigh Track. **The State Government should investigate and support development of the Richmond Vale Rail Trail.**

There are many individual statements in the Plan to agree with, and even some of the Directions and Actions. It is, however, hard to see how it is going to be implemented without actions being prioritised and timelines set. It must be noted, that until the actions are completed, this Plan achieves nothing! **The final Plan needs to have priorities and timelines set.**

It is also frustrating to see new committees being formed and new mechanisms put in place to progress this Plan, with new requirements on Councils, which will no doubt require more resources or divert resources from existing activities. One fears it will take the first 5 years to implement and fine tune the system for delivery, without actually delivering anything! **The Plan should contain greater accountability for who is doing what eg departments, agencies, committees, Councils etc.**

The draft Plan identifies various land uses separately but fails to identify the land use conflicts. It does not give any answers to those in the areas subject to land use conflict. This gives no surety or security to the community, the environment or developers, for that matter. At the very least, **the final Plan needs to identify the land use conflict zones and identify what is to be done to resolve the conflict and at what priority/timeline.**

The Plan needs to acknowledge that habitat corridors are not a “choice”, they are defined by what is left of the Hunter’s native vegetation. These corridors need to be protected as a matter of urgency and alternative “choices” made about transport corridors, industrial land and housing.

The economy of the Hunter Valley will be slow to turn around from the current reliance on coal. **The final Plan needs to acknowledge that the Hunter's days of reliance on coal are waning and a real plan needs to be developed for what is to take its place, both for jobs and energy.**