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The General Manager
Department of Environment and Planning
Hunter & Central Coast
PO Box 1226
Newcastle NSW 2300

Attention: Monica Gibson

Dear Monica

**RE PUBLIC EXHIBITION OF DRAFT HUNTER REGIONAL PLAND AND DRAFT PLAN
FOR GRWOING HUNTER CITY**

Thank you for the opportunity to provide comment on the Draft Hunter Regional Plan and Draft Plan for Growing Hunter City and for the opportunity to participate in the Department of Planning and Environment's agency workshop held in Newcastle.

Hunter Water provided substantial advice during the agency workshop regarding the importance of protecting the region's drinking water catchments. Hunter Water requests that this feedback be considered as part of your consultation process. In addition to the comments provided as part of the workshop, the following comments are also offered: -

Network Capacity

The majority of the major future growth areas highlighted in the draft plans have been identified in Hunter Water's Growth Mapping and Monitoring Project (GMMP) and, as such, regional servicing requirements have generally been accommodated within Hunter Water's forward capital works program.

Hunter Water has developed servicing strategies for regional development areas such as the Lochinvar Investigation Area, Anambah Investigation Area, and the Thornton North Development area. These servicing strategies outline available capacity and required assets/upgrades to service growth.

Hunter Water will update the GMMP to include the newly identified areas and assess their impact on the capital program and to determine availability of capacity within the water and sewer networks.

Hunter Water expects that councils will discuss any future rezoning proposals to confirm availability of water and sewer network capacity to service these areas.

Water Resources

Hunter Water's core interests in the Draft Hunter Regional Plan and Draft Plan for Growing Hunter City concern protection of the region's drinking water catchments, which are gazetted as Special Areas in the *Hunter Water Regulation 2015* (the Regulation).

In accordance with the Regulation the ongoing ecological health of the drinking water catchments is of paramount importance to Hunter Water. Furthermore, the *Australian Drinking Water Guidelines 2011* specifies that the drinking water supply system must have, and continuously maintain, robust multiple barriers appropriate to the level of potential contamination facing the raw water supply. The most effective barrier is protection of source waters to the maximum degree practicable.

Draft Hunter Regional Plan – Direction 3.2

The relevant 'Direction' in the Draft Hunter Regional Plan addressing the drinking water catchments is Direction 3.2 - Secure the Health of Water Resources and Coastal Landscapes. While this Direction does mention the need to protect the region's water supplies, the primary focus is on environmental and recreational values associated with water resources.

Given the critical importance of drinking water resources to the health and wellbeing of the community and economic development in the region, Hunter Water strongly recommends that the quality and security of the region's drinking water supplies be addressed as a separate Direction.

As noted by stakeholders at the agency workshop on 2 February, the draft Central Coast Regional Plan contains a dedicated Direction to 'Sustain Water Quality and Security' (Direction 4.2). This Direction includes 'Actions' relating to 'securing water supplies' and 'sustainably managing surface and groundwater'. Hunter Water recommends that a similar approach be adopted for the Hunter Regional Plan. Consistent use of the term 'drinking water catchments' is also recommended, to distinguish them from other types of water assets. Hunter Water is happy to assist with preparing content for the new Direction.

Action 3.2.1 of the Draft Hunter Regional Plan contains some recommendations to protect drinking water supplies, including planning controls to manage growth and the requirement for development proposals within the drinking water catchments to demonstrate a neutral or beneficial effect (NorBE) on water quality. In addition to the NorBE requirement, some types of development are inherently incompatible with drinking water catchments based on the unacceptable threat to water quality that they represent. Hunter Water recommends that the Hunter Regional Plan and Growing Hunter City documents clearly state that some types of development should be excluded from the drinking water catchments on this basis.

It is also suggested that wording be included such that "Hunter Water works with Councils and other stakeholders on strategic planning within the drinking water catchments, and also assesses individual development proposals in accordance with the *Hunter Water Act 1991* to ensure the ongoing integrity of the drinking water catchments."

It is noted that the Hunter Regional Boundary partially includes the operational area of MidCoast Water. It is recommended that MidCoast Water also be consulted regarding acknowledgement of their role in the Hunter Region as defined in the Draft Hunter Regional Plan.

Draft Plan for Growing Hunter City

The Growing Hunter City document has minimal reference to protection of the drinking water catchments. The introductory text in the section on the Northern Gateways District makes a brief mention of the City's drinking water sources and Action 7.2.1 proposes 'identifying opportunities for sustainable development outcomes at Medowie that do not affect water quality'. Given the importance of the drinking water catchments in guiding future development for the Hunter, Hunter Water suggests that further commentary be included under Direction 7.2, similar to that recommended above.

Hunter Water welcomes the opportunity to meet with the Department of Planning and Environment to discuss these comments in more detail if required. We are also available to work together with the Department of Planning and Environment on draft content for the Plans where appropriate.

Should you require further clarification or assistance please do not hesitate to contact Hunter Water's Mr Paul McKoy on 02 4979 9476.

Yours faithfully



Brett Lewis
Group Manager Developer Services