

## Submission on Draft Greater Newcastle Metropolitan Plan 2036: John Sutton

Thank you for the opportunity to provide feedback and comments on the currently exhibited Draft Greater Newcastle Metropolitan Plan 2036.

I have had extensive experience in the area covered by the Plan, including as an elected representative, journalist, academic, public interest advocate, and civic, environmental and social change activist, and as an active member of a range of community-based organisations in the Newcastle area over the past 30+ years.

A significant number of the views expressed in this submission do reflect the position of a number of community groups of which I am a member. However, I am making this submission on my own behalf, and not as a representative or spokesperson of any of these organisations.

I offer the following comments and recommendations on the draft Plan:

1. While this submission has significant concerns about a range of proposals in the draft Plan (see points below), it strongly supports the integrated and collaborative planning approach broadly advocated in the draft. However, such laudable expressions of general intent are not new, and despite similar rhetoric in the past, vary markedly from the lived experience of the local communities covered by the Plan under successive state governments. Nor is the approach supported by the Plan consistently reflected in significant elements of the Plan itself, as outlined hereunder.
2. Natural assets, biodiversity and sustainability:

This submission supports the various references in the Plan aimed at protecting, conserving and enhancing significant natural assets within the Plan's coverage. The Plan area encompasses some of the state's most precious natural assets (e.g., the Hexham wetlands, the Kooragang wetlands (including its Ramsar protected area), the Hunter River and its many tributaries, the coastline from the Stockton Bight sand dunes to the Swansea Channel, Lake Macquarie (Australia's largest coastal lake), and major biodiversity corridors and bushland areas such as the Blue Gum Hills Regional Park and the Watagan forest). The paucity of references to these natural areas in the Plan, and the often highly restricted context in which they appear (e.g., the aim to protect Ramsar-listed wetlands and regional biodiversity corridors is expressed in the Plan only in relation to the Tomago Industrial Precinct (p.86)), highlights a significant deficiency in the draft Plan, which largely ignores the challenge of achieving environmental conservation and rehabilitation objectives in the face of ongoing and emerging development threats, particularly in areas on or near the urban fringe.

References to the area's natural assets are almost absent from the Plan's high-level strategic statements, and where they do appear they are invariably framed within – and subservient to – the dominant economic discourse and development objectives. The Plan's Vision statement (p.9), for example, contains no reference to the area's natural environment. Environmental assets are not merely elements of the area's "economy and lifestyle" (the two values reflected in the current draft Vision statement) – they have both intrinsic (i.e., ecological) value, and utility value, in providing vital environmental services to the human population of the Plan area. Under "A biodiversity rich natural environment" (the environmental objective extracted from the Hunter Regional Plan 2036) the draft Plan identifies enhancing "environment, amenity and resilience for quality of life" as an outcome to underpin the Plan's Vision (p.14). Most of the strategies and actions outlined in the Plan have little to do with biodiversity or the natural

environment (e.g., “Create better buildings and great places”; “Create more great public spaces where people come together”; “Protect rural amenity outside urban areas”). Such actions are laudable in themselves as urban planning objectives, but they should not be misleadingly listed under a strategic objective that purports to be primarily about biodiversity, giving the appearance that the Plan adequately addresses something that it does not. While this submission strongly supports the Plan’s proposed action for the completion of the long-term protection of regionally significant biodiversity corridors (Strategy 2.3, p.43), it is concerning that this action is framed primarily as a device to facilitate fast-tracking development by means of biodiversity certification for priority housing release and catalyst areas (Strategy 3.2, p.54). Ironically, the natural environment is not even mentioned in the section of the Plan titled “A Planned Approach to Growth and Sustainability” (p.16), leaving the relevance of the reference to “sustainability” here entirely unclear.

The Plan’s failure to adequately deal with and protect the area’s natural assets and biodiversity, and to provide a pathway to ecological sustainability, is a major deficiency.

### 3. Climate Change:

The Plan also fails spectacularly to address the planning challenge posed by climate change. Quite aside from ignoring (and therefore failing to address) the fact that the area encompassed by the Plan includes the world’s largest coal export port, and therefore plays a key role in the economic and transport networks that fuel global climate change, the Plan’s attempts to address climate change are so trivial as to be laughable. The Plan contains only three references to climate change, one of which is a Glossary definition. The others comprise a general aim (under Strategy 2.5) to “improve resilience to natural hazards and climate change”, and one further reference in the detailed section associated with that Strategy (p.45), which is almost exclusively concerned with natural hazards. The one action that specifically refers to climate change is a proposal to incorporate climate change parameters and mitigation measures in natural hazard risk assessment, restricted to “opportunity sites” within the Newcastle City Centre. This scant, trivial and simplistic treatment of climate change in the Plan conveys the impression that the Plan’s authors are either ignorant of the central importance of climate change and its impact for the area covered by the Plan, or are climate change sceptics or deniers. This deficiency in the draft Plan also requires major revision.

### 4. Trees:

The Plan’s comments about the desirability of increasing tree planting and canopy coverage (Strategy 2.3) are worthy and apposite, though the Plan’s authors appear not to be aware that the organisational culture and practice of some councils in the Greater Newcastle Metropolitan Area (e.g., Newcastle Council) in relation to such matters is significantly at odds with the comments in this section, and indeed with their own policy rhetoric. Since 2009, for example, Newcastle Council has had a stated policy (in its Urban Forest Policy) of increasing total canopy coverage and of developing targets to measure this, but has still not developed such targets, and continues to deplete the city’s canopy coverage by the wanton removal of large canopy trees throughout its LGA. The council’s organisational culture has proven averse to the pursuit of its own stated Urban Forest Policy goals, and the council has shown no inclination or willingness for reform in this regard. If the Greater Newcastle Metropolitan Plan is serious about achieving the goals of Strategy 2.3, it should – as a minimum - include an Action to develop relevant canopy coverage targets for the Plan area, particularly for those parts in which such coverage has been

compromised, and associated systems for effectively monitoring and reporting progress on meeting such targets

5. Relocation of Carrington Coal Terminal:

This submission strongly supports the draft Plan's stated intention to "investigate the potential to relocate coal export facilities and bulk fuel storages away from residential areas and explore options to renew the Carrington Precinct for alternative uses (including tourism)" (Under Newcastle Port, Carrington Precinct, p.84).

As a resident who lives close to the Carrington coal terminal (T1), I am familiar with the ongoing detrimental impact of this facility on local air quality and residential amenity. The capacity of other existing coal loaders could easily absorb the relatively smaller throughput of the Carrington facility, even without recourse to PWCS's proposed Fourth Coal Terminal (T4). The renewal of the lease of this Port land provides a significant opportunity to diversify Port activities, and to establish an alternative land use that is more compatible with its proximity to residential areas.

6. Throsby Creek:

This submission supports the aim stated under "Newcastle Port, Throsby Precinct" to "protect and expand the recreational reserve along the Throsby Creek foreshore" (p.84).

I have had a long-term involvement with the Throsby Creek rehabilitation project, and strongly agree with the stated objective referring to the recreational amenity of the waterway. However, the rehabilitation of Throsby Creek's estuarine and riparian ecosystem (including improved water quality, biodiversity, etc) has been as much a focus of the collaborative effort that has been applied to the waterway over the past three decades as its recreational amenity. This work has involved local community-based organisations within the catchment, Newcastle Council, Hunter Water, the (former) Hunter Catchment Management Trust and its descendent agencies, NSW Roads and Maritime Services, and other relevant state agencies. A committee facilitated by Hunter Water is currently continuing that valuable work.

To reflect this, **I strongly recommend that the current aim be amended to incorporate protecting and improving the Throsby Creek estuarine and riparian ecosystem.**

The NSW Roads and Maritime Services is the primary agency for managing recreational waterways. Since the Plan envisions expanded recreational use of Throsby Creek, it **should include a specific reference to investigating the potential to extend ownership and management of the waterway to NSW Roads and Maritime Services upstream to the Maitland Rd bridge**, which would provide a more appropriate agency framework for planning and managing such for future uses of this section of the waterway than its current ownership and management by Hunter Water.

7. Governance issues and the role of the Hunter Development Corporation:

This submission generally agrees with the argument advanced in the Plan in relation to the need for collaborative governance arrangements across the Plan area to support the delivery and implementation of the Plan (p.18). Properly implemented, a number of the approaches identified in the Plan would assist this objective, particularly the three dot points listed on page 18. However, the proposal (on p.18) for the Hunter Development Corporation (HDC) to play the lead role in facilitating the collaboration required to successfully deliver the Plan is deeply ironic

and gravely flawed. Throughout its history, the HDC has consistently acted as little more than the mouthpiece of the area's development lobby, and has a record of divisiveness, dishonesty, and unethical conduct (I am happy to provide the relevant evidence to substantiate these allegations). Nominating the HDC for a leadership role in facilitating "collaboration" will raise major questions about the Plan's *bona fides*, and about the kind of "collaboration" it envisages. Instead, **the HDC should be dissolved and replaced with an agency or regional body more capable of representing the diversity of the Hunter community, and better able to facilitate a genuinely collaborative approach.** If the current proposal remains in the Plan, it will be considered by many to be a deliberately provocative move that will undermine both the Plan's credibility and its future success.

This general concern flows through to the various sections of the Plan that propose actions in which the HDC would play a lead role. **In such instances, the role the Plan identifies for the HDC in relation to actions and outcomes requiring collaboration should be re-allocated to agencies or organisations with more competence and credibility in working with relevant stakeholders.**

For similar reasons, I am deeply troubled by the role the Plan identifies for the Hunter Development Corporation in actions related to the Revitalising Newcastle Program, and particularly in the transport aspects of that Program (see "Actions" under Strategy 1.1, p.24). The HDC is not a transport agency, and lacks the relevant experience and expertise to "coordinate the delivery of frequent and reliable travel to and through the city centre via the Newcastle Light Rail, Newcastle Bus Interchange and Newcastle Interchange". The HDC's record with transport related projects in Newcastle has been one of dismal and recurrent failure, and its conduct in such matters has been incompetent, misleading, deceptive and unethical. The prospect that this agency will continue to play any significant role in planning or delivering Newcastle's future transport system will alarm anyone who genuinely knows or cares about that system and the HDC's appalling record in this area. **The responsibility for delivering transport outcomes associated with the Plan should be given to an agency or organisation with relevant transport experience and expertise, and a record of success in working collaboratively with the community on such matters.**

#### 8. Transport Planning and Delivery:

This submission strongly disagrees with the statement (in Strategy 4.1) that "The Newcastle Interchange and Light Rail from Wickham to Pacific Park, plus the establishment of Newcastle Transport as the operator of an integrated public transport system, provides the basis for future transport improvements" - except insofar as these changes have so damaged Newcastle's transport system that almost any further change would have to be an improvement. The cutting of the Newcastle rail line, the ensuing expensive and ongoing fiasco of planning and implementing the replacement light rail service, successive changes to the city's bus services, and the privatisation of Newcastle Buses, have all contributed to reduced service levels and a significant and ongoing decline in public transport patronage. The changes that this Section of the Plan presents as "a basis for future transport improvements" have done so much damage to Newcastle's public transport system that the government even failed to achieve its own previous goal for a relatively modest increase in peak hour commuter patronage to and from the Newcastle CBD (in the O'Farrell state government's NSW 2020 Plan), and references to these goals have now quietly disappeared from relevant government documents and statements. (Notably, the transport section of the draft Plan also lacks any relevant public transport targets, or any recommendation to develop such targets).

The damaging changes to which the draft Plan refers were decided and implemented in the absence of any kind of integrated planning approach or meaningful collaboration with the local community, such as the draft Plan advocates. Rather, they were the result of persistent lobbying by sectional vested interests, and were adopted contrary to expert evidence, and without the support of the local community, in circumstances that were contrary to almost every principle of sound public policy decision making. They were the very antithesis of the integrated, collaborative planning approach advocated in the draft Plan.

Moreover, the government is now in the process of further compromising Newcastle's future transport planning options by rezoning the former rail corridor land between the new Wickham terminus and the former Newcastle station to facilitate built development on the corridor, contrary to its previous promises and commitments about the intended future use of that land. In the light of all this, high-sounding government statements of intent regarding improvements to Newcastle's transport system have little credibility among the local communities within the Plan area. The Plan's stated intention to give the HDC (an organisation that has advocated for damaging changes to Newcastle's transport system) a significant role in Newcastle's future transport planning and delivery will eradicate any remaining vestiges of such credibility and will undermine any opportunity the Plan might provide for the government to recover from its already severely battered reputation in this area of public policy, and to re-establish a modicum of trust with the community.

9. Proposed Lower Hunter Freight Corridor (LHFC):

This submission supports establishing a rail corridor that would allow freight trains to bypass heavily urbanised areas within the Plan area, for the reasons outlined in the Plan and on the Transport for NSW website (<https://www.transport.nsw.gov.au/projects/current-projects/lower-hunter-freight-corridor>). However, route planning for such a corridor must ensure that it does not encroach on the Hexham wetlands or any other high conservation value land, or compromise the Richmond Vale Rail Trail project. Strong consideration should be given to a route alongside existing transport corridors to minimise any detrimental impacts on environmentally sensitive areas.

The Plan's stated intention to "ensure that incompatible uses do not encroach on the proposed Lower Hunter Freight Corridor" should be accompanied by a concomitant intention to "ensure that the proposed Lower Hunter Freight Corridor does not adversely affect high conservation value land".

The current preliminary investigation of options for the LHFC by Transport for NSW – and its stated intention to consult the community on the project at some time in the future – is noted, but it is regrettable that the state government has not consulted widely and thoroughly with local communities and community-interest stakeholders on this important project already, in this early stage of the project. The current in-house approach risks wasting government resources, eroding community trust and creating unnecessary division.

10. Mayfield Spur Line:

A number of community groups in inner city Newcastle suburbs affected by freight rail movements through their residential areas have proposed a spur line running south from the Sandgate/Kooragang Island line, through the former BHP steelworks land along the Mayfield side of the Hunter River, to service the port along the river from Tourle St to the area currently serviced by the spur line that runs beside Tighes Hill and Mayfield East to the current Carrington

Coal Terminal. Such a spur line could replace the Tighes Hill/Mayfield East spur line, removing its detrimental impacts on nearby residents, at the same time as providing rail access to and from the wharf areas along the Mayfield side of the Hunter River, and releasing land on the existing corridor for development. The potential economic and amenity benefits of such a spur line would be considerable, and should be seriously investigated. In conjunction with the proposed LHFC, such a line could relocate almost all the freight rail that currently travels through the Newcastle residential area.

11. Ammonium Nitrate Stockpiles:

Along with a number of prominent local community organisations, this submission strongly supports the relocation of the current massive stockpiles of ammonium nitrate at Kooragang Island and Sandgate. Given the close proximity of these stockpiles (the largest in the world) to some of Newcastle's most densely populated urban areas, and the ongoing catastrophic danger they pose to the thousands of people who reside or work within their potential blast radius (i.e., much of the Newcastle LGA), the continued inaction of governments on relocating these stockpiles is inexcusable, particularly in the light of ostensible government concerns about terrorism risks. Relocation of these stockpiles should be included as a priority action in the Plan.

Thank you for the opportunity to provide this feedback and comments on this important Plan.

I have no problem with this submission, or any part of it, being made public.

Please let me know if you would like any further information to clarify any of the matters raised in this submission.

Sincerely

John Sutton

28 February, 2018