



General

Thank you for the opportunity to make a submission on the Draft Hunter Regional Plan and Draft Growing Hunter City Plan.

The focus on coal, coal seam gas (CSG) extraction and the transport of coal in both documents means that the Hunter will be inextricably tied to a dying twentieth century fossil fuel industry rather than being steered toward a modern, sustainable future.

In a carbon constrained world it is unacceptable that the NSW government is prioritising coal and CSG over so much of the Hunter Valley, cementing the operation of the Coal Chain and propping up a privatised coal port to maximise the export of increasingly low value coal from financially challenged coal mines.

As global fossil fuel prices look set to stay at historic lows and as the rest of the world is moving away from coal and toward renewables, it is impossible to see how sterilizing large parts of the Hunter from more productive and sustainable industries is good planning.

The government must explain how the prioritising of coal in the Hunter will fit with its responsibility to contribute to Australia's commitment in Paris to reduce emissions consistent with less than 2 degrees global warming.

In addition to this fundamental misdirection, both the draft plan's primary concern is growing the Hunter's economy - prioritising only economic considerations over environmental and social considerations. Prioritising money over the environment and wellbeing of the community is unacceptable. Ecologically sustainable development must be the foundation of both plans.

Facilitating agricultural industries is identified as important in the regional draft but there is no attempt to: identify their needs; put in place specific supportive strategies; or resolve the inherent conflicts with mining.

Both documents are virtually devoid of any data justifying their vision, directions and actions. The draft is silent on the views of the community, failing to mention a 2014 Australia Institute survey where 83% of respondents indicated that they did not want to see the mining industry expand, and 41% wanted to see it decrease or phased out.

Creating four subregions in the draft Hunter Regional Plan also adds little value. Its primary purpose seems to be an attempt to divide the interests of the population and contain the backlash against the pro-mining proposals in the Northern Tops by encouraging people to focus on their own subregion.

The rebadging of Newcastle and its surrounds as Hunter City and its hinterland also offers little more than a strategy to divert the attention of the lower Hunter community away from the pro-coal agenda of the Hunter Regional Plan. The same Australia Institute survey noted that 47% of Newcastle city residents favour reduction of the coal.

There are concerns that the intent of the Growing Hunter City draft Plan is to cement the continued operation and growth of a piece of unpopular infrastructure for the next 20 years.

The thinking around the issue of why a new Hunter City is warranted and the rationale for defining the boundaries of the new City is not made clear. There is no indication of the implications of being in or out of the new City area. There are no major specific planning initiatives which warrant the changes proposed. It has no relationship to the other key proposed change in regional governance which is the government's proposed merger of Newcastle and Port Stephens Councils. Having two concurrent and contradictory proposals for the management of the Greater Newcastle area looks very much like one arm of government having no idea what the others are doing.

The rationale for subdividing the new city into districts is also unclear. It is notable however that the route of the Coal Chain falls within the overlap between 4 of the 5 districts suggesting an attempt to 'disappear' the issue from any one district and minimise the traction of community complaints about the rail freighting of coal.

The emphasis is on outlining a number of issues for the Hunter City which the government intends to develop planning approaches but yet implemented. In short it fails to identify any specific plans that benefit Newcastle.

Specific issues with the draft Hunter Regional Plan

Coal mining and CSG

One third of the 87 page report is focussed on coal mining and coal seam gas. The emphasis is on the economic benefits of the mining with virtual silence about the impacts on: non-mining industries; the health and well-being of communities; air pollution; ground water impacts; biodiversity; and critical habitats.

In 2012-13 the Port of Newcastle coal exports generated 334 M tonnes of emissions annually – 60% of Australia's entire greenhouse gas emissions 557 M tonnes.¹ The government needs to explain how protecting and encouraging the continued growth of coal mining in Hunter fits with a federal commitment to wind back Australia's greenhouse gas emissions as is urgently required to meet an international commitment to positively contribute to reducing emissions consistent with achieving well under 2 degrees global warming. The time for greenwashing of the NSW government's commitment to climate change should be past.

The draft plan overinflates the economic importance of coalmining to the Hunter and NSW when the reality is that:

- 5% of Hunter workers work in the coal industry (95per cent of Hunter workers do not)
- 2% of NSW government revenue comes from coal royalties
- In 2014 the ABS estimated the coal industry profit margin of 24.3% - 79% of which is exported
- Economic modelling by Regional Devt Australia showed long-term adverse conditions for coal in the Hunter would have minimal effect on employment (zero to 1.2%) and economic output (0.2 to 4%)²

In relation to CSG the draft only focuses on the economic prospects with no mention of community objections. Accordingly, since release of the draft plan the Gloucester community's strong anti-CSG campaign and the subsequent AGL exit from Gloucester has meant the collapse of CSG in Hunter. Any future draft plan must be more than a proponent for an industry with no social licence.

¹ Seeing Through The Dust: Coal In the Hunter Valley, The Australia Institute
<http://www.tai.org.au/sites/default/files/PB%2062%20Seeing%20through%20the%20dust%20-%20Coal%20in%20the%20Hunter%20Valley%20economy.pdf>

² Ibid.

Community views.

The draft is silent on the fact that large sections of the Hunter community do not support the ongoing expansion of coal mining and export. A 2014 survey of 1,001 Hunter residents found:

- 83% did not want to see the industry expand, while 41% wanted to see it decrease or phased out; and
- 37% felt that the industry's economic contribution outweighed the costs on the community.³

The draft plan is entirely focussed on setting an economically driven planning objective for the Hunter with no concern for acknowledging, or addressing, the concerns of a large section of the community. This approach must change in a future draft plan.

Transport

The draft plan states an intention 'to support gateway facilities (port and airport) and their associated networks (ie. the Coal Chain) to adapt and grow through appropriate planning'. Nothing will get in the way of coal expansion. A proposal to monitor and manage the impacts on air quality and amenity does not acknowledge the clear community objection to Coal Chain coal train impacts.

In discussing the role of Hunter City in the Hunter Region the draft plan points to the obvious role of better connections between the city and urban areas to improving productivity and building economic success. No specific plans, undertakings or proposals are provided. Significantly it ignores the fact that in the past year the government has actively destroyed this type of connection in central Newcastle when it closed the rail line into the city. This connection must be reopened to ensure connectivity.

Significantly, it is a major omission that there is no visionary commitment to protect a corridor for a high speed east coast rail corridor – including a Glendale -Kurri-Kurri- Maitland corridor.

Biodiversity

The clear message of the draft is that continued economic growth (resource extraction and industrial) is more significant than ecological protection. The draft plan signals a break from previous planning policy which actively sought to achieve biodiversity protection in situ.

Direct impacts on forests under the draft plan are very high. The maps provided show that coal mining titles cover most of the State Forests in the region, meaning that the plan directly threatens many thousands of hectares of plantation and native forest.

The draft plan shifts the focus from protection to enhancing habitat connectivity across the Hunter. So the way is being opened to destroy endangered or critically endangered communities on the promise of a lesser quality of biodiversity being protected elsewhere. So cases like the Warkworth extension which destroyed the only known area of Warkworth Sands woodland in the world – forest that grew on the top of ancient sand dunes, are set to be sanctioned.

Connectivity is positive but not in place of protecting important biodiversity in situ.

Offsets

Environment preservations have predictably been treated as a low priority for the State Government, with the report stating that they will encourage bio-banking to ensure conservation.

³ Ibid.

Offsetting fundamentally accepts that however much high quality biodiversity is present – it is acceptable to reduce it by half or more in order to promote development. The Greens NSW do not accept that rationale.

A shift to private conservation schemes, such as BioBanking, to manage biodiversity offsets will make assessment processes fragmented and complex which will undermine the stated objectives of offsetting. It is notable that in the planning process for the expansion of the Warkworth mine, Rio Tinto gained approval to destroy 611 hectares of native bushland; a significant proportion of which Rio Tinto had earlier promised to protect in perpetuity as an offset. It is unacceptable that already complex biodiversity processes are made so convoluted that biodiversity protection is threatened.

Aboriginal Heritage

Aboriginal Cultural Heritage has been treated as an afterthought, with no solid plans outlined in the report to preserve Culture and Heritage.

It is alarming that with the long term involvement of the government in the planning of the Hunter, that it is still only planning to support the preparation of appropriate heritage studies to inform the development of strategic plans, including regional Aboriginal cultural heritage studies.

Water

The draft plan proposes a risk management approach to determine the water quality implications of development are acceptable. Defaulting to a case by case assessment of risk is a worrying given the government's recent track record of assessing the environmental risk of coal mining on the Sydney drinking water catchment. In that case, even though the Special Areas of Sydney's drinking water catchment already loses billions of litres of water every year as a result of damage caused by mining, the decision was made to favour advice (of a pro-development agency) that risk was low over the advice of the specialist water management agency which identified that the risk was unacceptably high.

The assessment of water quality must be an objective and transparent process.

Specific issues with the draft Growing Hunter City Plan

Rationale for a new City and its hinterland

- The new Hunter City is described as “the metropolitan area extending from Toronto and Swansea in the south to Raymond Terrace in the north and from Newcastle Harbour in the east to Lochinvar in the west. It has emerged from the expansion of Newcastle and its surrounding towns and has a rich history and strong growth prospects for the future.” No analysis is given around the issue of why a new Hunter City is warranted. No rationale is provided for defining the boundaries of the new City, and there is no discussion of the role of the Hinterland and what the implications of being in or out of that area.

Importantly, there is no recognition that the government is concurrently proposing other fundamental changes to the city's regional governance - the proposed merger of Newcastle and Port Stephens Councils. Having two concurrent and contradictory proposals for the management of the Greater Newcastle area looks very much like one arm of government having no idea what the others are doing.

The quick rebranding of the lower Hunter as Hunter City and its hinterland seems little more than a strategy to divert the attention of the lower Hunter community away from the pro-coal agenda of the Hunter Regional Plan and the cementing of planning provisions facilitating the unfettered operation of the Coal Chain and Port of Newcastle in the draft City Plan.

Districts

The new city area is divided into five districts as the basis for developing directions and actions. The districts are described as distinct and diverse but no information provided about the process behind identifying the districts.

It is notable that the route of the Coal Chain falls within the buffer areas identified between 4 of the 5 districts. This appears to be an attempt to divide the communities along the coal haulage route and make it more difficult for them to gain traction for coordinated planning remedies to their objections to the rail line. The serious impacts on the health and quality of life of the communities along the rail line deserve recognition and resolution – not a strategy to ‘disappear’ the problems.

Transport

The draft plans ‘to support gateway facilities (port and airport) and their associated networks (ie. the Coal Chain) to adapt and grow through appropriate planning’. A proposal to monitor and manage the impacts on air quality and amenity does not substitute for a clear acknowledgment of the widespread community objection to coal train impacts.

The draft plan points out that better connections between the city and suburban areas improve productivity and assist in building the economy. But no specific plans, undertakings or proposals are provided. Significantly it ignores the fact that in the past year the government has actively destroyed this type of connection in central Newcastle. This connection must be reopened to ensure connectivity.

Significantly, it is a major omission that there is no visionary commitment to protect a corridor for a high speed east coast rail corridor – including a Glendale -Kurri-Kurri- Maitland corridor.

Government investment in Hunter City

The draft plan indicates that around \$340 million of the proceeds from the long term lease of the Port of Newcastle will be invested in the revitalisation of Newcastle City Centre.

Before the sale of the lease the government undertook to inject 50% of the proceeds into the revitalisation of Newcastle [Herald Oct2013](#). The 98 year lease of Port Newcastle netted \$1.75B but \$340M is only 20% of the proceeds.

Urban Growth

The draft plan has little new to add about urban growth. It states that:

- previous regional level strategies have identified land releases sufficient to meet the estimated need;
- the challenge is timely delivery of land supply;
- it is important to locate housing where infrastructure has spare capacity;
- infill in existing areas as important; and
- it is important to protect transport corridors from development.

These statements do not warrant a regional plan.

Monitoring is proposed as the main way to assist in the delivery of land for development although there is no indication of the timing or specifics of such monitoring and how the government will ensure land is made available.

It indicates an intention for the government to prepare a Hunter City integrated planning strategy so local plans and strategies can be assessed against it.

It appears that urban growth and change is not a primary objective of the draft plan.

Industrial Activity

There are generic high level statements – for example that the links between transport and industry are important. The point is made that the timing of exploitation of a few pockets of active or as yet undeveloped mining resource potential will determine the availability of land for alternate uses. Otherwise there is only a statement of intention to work with councils to monitor industrial land supply and ensure its timely release.

Blue and Green

The draft plan (17) indicates an intention to:

- plan and deliver the Hunter City Green Grid; and
- work with councils and communities to do this.

That nothing has been done other than develop an idea for a grid reiterates that the Growing Hunter City Plan is no more than a plan for a plan.

Community views on the Coal Chain.

The draft Plan is silent on the fact that Newcastle residents in very large numbers object to the health and aesthetic impacts associated with coal dust and the impact of coal dust on biodiversity in wetlands along the Coal Chain route.

That the route of the Coal Chain has been relegated to the buffer area between four different districts suggests that the draft plan has been formulated specifically to ensure that processes under the plan will make it difficult to coordinate community objection to this controversial piece of infrastructure.

This silence and the drafting of the plan is a betrayal of rail impacted communities by a government in thrall of the fossil fuel industry.

Should you wish to discuss any of these matters further, please don't hesitate to contact my office on (02) 9230 3030 or david.shoebridge@parliament.nsw.gov.au

Regards,



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