

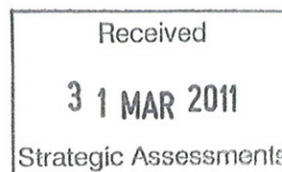


GREEN CORRIDOR COALITION INC
(Supported by over 50 Conservation and Community Groups)

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28th March 2011

Mr Sam Haddad
Director General, NSW Department of Planning
GPO Box 39
Sydney NSW 2001



**Re: Concept Plan (MP10_0090) Minmi, Link Road North & South Residential Development
(Northern Estates) – Newcastle.**

Dear Mr. Haddad,

In respect to the above concept plan Green Corridor Coalition (GCC) acknowledges the concurrent Concept Plan (MP10_0093) Black Hill Employment Lands (Northern Estates) and that a combined 2,106Ha of regionally significant conservation land is proposed to be dedicated to the Stockton Bight to Watagans Biodiversity Corridor (Our Green Corridor). GCC supports this aspect of the proposal and the ultimate rezoning of these lands to 'E1 – National Parks and Nature Reserves' has been a major goal of GCC.

GCC understands that these conservation lands is the sum of 1,561Ha of "Stockrington Lands" (including a 17Ha parcel of land just north of Minmi) being off-set against 520Ha of housing development lands around Minmi plus 398Ha of "Stockrington Lands" together with the 147Ha "Tank Paddock" being off-set against 183Ha of employment lands at Black Hill.

There are, however, two considerable issues of concern that GCC asks NSW Planning to address.

Reduction in conservation offset lands.

In a previous public exhibition proposal by C&A in 2009, it was established that 2,264Ha of "Stockrington Lands" be nominated as off-set for 520Ha of housing development lands around Minmi and the 147Ha "Tank Paddock" be off-set against 183Ha of employment lands at Black Hill. The current proposals now share the conservation off-sets proportionally (75:25) but the sum of those off-sets only equals 2,106Ha; a short-fall of 305Ha. Despite the enormity of the overall conservation lands this 305Ha is still significant and equivalent to two Tank Paddocks.

At this point GCC directs Planning's attention to the enclosed map 'Northern Area – Final Development and Conservation Areas' (Concept Plan Environmental Assessment; Appendix F - Ecological Assessment; Appendix 2 - Ecological Inventory Report – Lower Hunter Lands; Figure 1-2: Northern Estates).

The current proposals reveal that this 305Ha short-fall has been acquired by the Roads and Traffic Authority (RTA) and that it is being used as off-set against the development of part of the

new Hunter Expressway. This is despite the written assurance in 2007, by the then State Planning Minister, that "I will ensure that the land is only used to offset one activity".

This fact has been highlighted recently in several items in the local media including a 'letter to the editor' from GCC.

The point that needs to be understood here is that two years ago a certain amount of conservation off-set was considered proper for the development proposed at Minmi and Black Hill. Now the same off-set is considered (apparently by NSW Planning, RTA and C&A) proper for both the development proposed at Minmi and Black Hill as well as part of a four-lane highway. GCC clearly sees this as a loss for biodiversity and contends that the RTA project needs to find additional off-sets within Our Green Corridor for the Hunter expressway, as suggested below.

It should also be noted here that the originally agreed ratio of conservation land to developable land for the C&A Northern Lands was set at an 80:20 split. This figure was arrived at after extensive consultation and negotiation. These current proposals have decreased the ratio to a 75:25 split without any input from the community. This is unacceptable to GCC as all mapping clearly showed the 80:20 offset split right up to the release of the latest exhibition documents.

Inadequacy of connectivity between Blue Gum Hill Regional Park (BGHRP) and Our Green Corridor.

Since 2000 it has been a recurring feature of the various development strategies compiled for this area that a substantial corridor and vegetated buffer be set aside to link BGHRP with Hexham Swamp. Strategies include 'Stockton Bight to Watagans and Lake Macquarie Conservation Framework – 2001', 'Thornton – Killingworth Sub-regional Conservation and Development Strategy – 2003' and the 'Lower Hunter Regional Strategy – 2006'. Other studies that pre-empted those previously mentioned include both the 'Tank Paddock consultant's and BGHRP consultant's separate mapping in 2000.

The Thornton – Killingworth Sub-regional Conservation and Development Strategy goes so far as to properly define such a corridor and clearly nominates Coal & Allied (C&A) lands lying between BGHRP and the Hunter Water Corporation land as being the most suitable for this purpose. It is GCC opinion that bad planning decisions since then have conspired to erode the possibility of retaining any semblance of a viable corridor to BGHRP. This situation will ultimately leave BGHRP disconnected from other wildlife areas.

The Concept Plan proposes two tenuous links along narrow drainage lines. On either side of one drainage line it is proposed to build sporting fields and the other drainage line runs between two lots of proposed housing. These cannot be regarded as wildlife corridors with any great capacity to facilitate movement in the event of sudden change (wildfire, flooding etc).

GCC wishes to bring to the attention of NSW Planning one design feature of C&A's proposed development that results in a large environmental loss for a small increase in development potential. This is the result of the all-too-common practice of working to property boundaries when a development constraint is immediately adjacent. In this instance, addressing this bad planning practice would help greatly in the establishing the wildlife corridor.

GCC directs Planning's attention to the enclosed map 'Blue Gum Hills – 2030'. This map featured in a recent Public Voice presented by GCC to Newcastle City Council and was done to demonstrate that a final hour solution to this problem is achievable. Part of the C&A Concept Plan (4.4.3 The Preferred Option) features a narrow strip (averaging less than 100 meters wide) of housing wedged between the creek line and the C&A boundary line common with another private

property (505 Minmi Road). This neighbouring property has been identified as being full of old mine shafts and mine subsidence issues, as well as ecological constraints.

It is the position of GCC that this narrow strip of housing (marked as Area A in red) should be removed from the suite of developable lands and redefined as conservation land. Once combined with a large proportion of the un-developable neighbouring property (505 Minmi Road) a more sound wildlife corridor could be secured.

GCC argues therefore that since the conservation lands have been effectively reduced then the forfeit of 30-odd housing lots on approx. 7 hectares (Blue Gum Hill – 2030 map Area A) from development to conservation can easily be attained and would help compensate for some bad planning decisions in the past.

Summary of position statement

The following is Green Corridor Coalition's recently resolved position, given the for-mentioned major changes to Coal & Allied's Northern lands Part 3A application, in regard to the dedication of conservation offsets.

1. GCC agrees with the proposed redistribution of C&A conservation lands between Minmi/Link Road and the Blackhill Part 3A applications.
2. GCC rejects the substantial reduction of 305 hectares of western Stockrington conservation lands, in the absence of a proportional reduction in the subdivision lot yield of 3,300 on 520 hectares; this identical subdivision plan being exhibited in C&A's 2009 public exhibition documents. This reduction in conservation land would equate to around 60 hectares of developable land.
3. GCC sees both Coal & Allied and the RTA as endeavouring to minimise their conservation offsets for both the development of 520 hectares for housing and the construction of the Hunter Expressway through the corridor. GCC has therefore resolved to call on Coal & Allied and the RTA to renegotiate the arrangements that has resulted in the loss of a substantial amount of conservation land when compensating for their separate development activities.
4. GCC objective has always been to retain a substantial ecological connection between the Blue Gum Hills Regional Park (national park), and the yet to be completed Green Corridor. To this end, GCC has resolved to accept the transfer of the for-mentioned development land (30-odd lots on approx. 7 hectares) to conservation, in exchange for the loss of the 305 hectares of conservation land now being claimed by the RTA as an offset. GCC trusts the RTA will compensate C&A.

GCC wishes to thank NSW Planning for the opportunity to make a submission to this Part 3A application and trust the department will take our concerns and objectives into account when making a determination.

Yours faithfully

Tom Clarke
Secretary, Green Corridor Coalition