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September 16, 2020

To: council@armidale.nsw.gov.au
cc interimadministrator@armidale.nsw.gov.au

Dear Council,

Our association is delighted to have been given access to the draft Creeklands Plan so we can provide a considered response; it is indeed a pity that the draft Plan was withheld by Council over two years.

Executive Summary

- We are delighted with the release of the draft Creeklands Master Plan and we congratulate the authors on creating a comprehensive compilation of the background, the consultation and the interesting concepts put forward in this professionally prepared document.
- The best features were the detailed figures and maps of the many features of the creeklands environment and the extensive consultation with most groups and individuals with interests in the creeklands.
- The levels and extent of soil contamination from past industrial activity is described well and should result in plans being made for its remediation.
- As soon as resources permit, the scope of planning needs to be extended beyond the limited geographical area covered by the draft Master Plan and should also include exploring how the original natural flow rates along the creeklands can be restored through water engineering.
- As plans are developed for future improvements, more engagement with the Aboriginal community, the University of New England and Armidale's sporting bodies would assist in improving plans.
- We approve the recommendations and our association would especially like to be part of any working group that might take this exciting plan forward towards refinement and implementation.
- This submission has the support of all members of our association. Our desire to see the draft Plan include the further investigation of safe instream water bodies along the city's creeklands also has widespread support from hundreds if not thousands of members of the broader community (see Evidence below).
- We trust that Council will revise the draft Creeklands Master Plan in response to submissions before it is adopted - and advise the community of the changes made.

The Good Points:

- The draft Master Plan is comprehensive, provides much useful background material, puts forward a wide array of worthwhile concepts and has drawn on a successful process of engaging the community and especially key groups with interests in the creeklands. We congratulate the authors.
- We especially liked the figures showing detailed maps of the many features of the creeklands environment.
- We are very interested in the suggestion made under Place Principles (p25) of a “waterway link to Dumaresq Dam”.
- We appreciate the detail provided around p30 on soil contamination. Our view is that soil contamination from any sources (e.g. gas works, tannery, pole treatment, etc.) needs to be addressed as an important matter for the community. It was pleasing to read the consultants’ view that “... soil contamination is not considered an insurmountable barrier to landscape works and use of the parklands ...”
- The description of the various community groups interested in the creeklands is a valuable section. We hope that these groups will work together to ensure that the many valuable ideas in this Master Plan move towards realisation.
- We particularly like the idea of replacing foot bridges with new bridges to ‘match design aesthetic’ (p63) and other imaginative design ideas.
- We like many of the images used to indicate the types of improvements envisaged by the consultants.
- The estimates of possible costings provide a valuable insight into the levels of funding that will need to be sought for various project components.
- The listing of references (p108) is valuable as it clearly identifies the wide array of individuals and groups with interests in the creeklands. Perhaps one of the last sentences of this Master Plan (“We acknowledge the efforts by the community and that the masterplan was driven by the community”) would be better inserted into the very front of the Master Plan?

Points of concern:

- Given the size of the document (114 pp) and the limited time frame for responses (28 days), we fear there might not be sufficient time or opportunity for many in the community to provide their opinion on the plan.
- We are pleased to have found a number of mentions in the draft Plan of the indigenous people of the region and the need for recognition of their perspectives. We wonder if sufficient has been done to seek their input? Our association has met a number of times with representatives of the local Aboriginal community and we believe that they have much to offer during both planning and implementation. Aboriginal representation should be part of any working group.
- As we noted in our original submission to the consultants (April 2018), the limited scope of the study to the area between Markham and Douglas Sts means that important factors have

not been adequately addressed. We continue to believe that a further study of broader scope is warranted to build onto the strengths of this draft Plan. Specifically, we would like to see exploration of sources of water to see the natural rate of flow of Dumaresq Creek restored to pre-Dumaresq Dam levels, through diverting other sources of water and/or through recycling perhaps using solar powered pumps. This would help ensure stream health is maintained even in dry times.

- The risk of flooding is discussed on p29. We fully appreciate the reality of flooding in Armidale and consider it an issue of major importance. Our submissions to Council have always stressed that any of our suggestions for water bodies and greater flows of water must NOT exacerbate flood risk. We believe that, with careful design, that is feasible and therefore this should not be an argument against well-designed instream water bodies.
- On page 42, a case is made against online artificial water bodies. In our view, there is insufficient recognition that well-designed instream interventions are possible. Examples include Inverell, Walcha, Bingara in northern NSW and Toowoomba and Stanthorpe in southern Queensland. Words used in the Plan suggest negative impacts: ‘small lakes’, ‘weir’, ‘embankment’, ‘raise flood levels’, ‘expensive’, ‘soil contamination’, ‘difficult to manage’, ‘eutrophication’, etc. We ask why not use some words such as ‘billabongs’, ‘constructed wetlands’, ‘lagoons’, ‘pools, riffles and streams’ the latter terms reflecting the natural watercourses of our Tablelands environment. We accept that options may well be restricted within the limited area of this Plan – but Armidale deserves to see some discussion here of other locations such as upstream from areas of soil contamination, downstream of Douglas St such as near the Cookes Rd bridge, and other creeks and tributaries where instream interventions have already been successfully constructed (e.g. dam in Mike O’Keefe woodland which has over time become ‘naturalised’ and the pools created in Black Gully Creek behind NERAM – at the instigation of members of our association as well as others from the community).
- Although reference is made to the highly relevant 1999 symposium on in-stream interventions in Dumaresq Creek (which includes many papers by specialists), no mention is made of the statement in the executive summary of that symposium which states: “Constructed wetlands, ponds and paths and bridges were rated highest for improving the recreational value and constructed wetland highest for improving the environmental value of Dumaresq Creek and its surrounds.” The fact that this symposium was held some 21 years ago does not diminish the value of the considered opinion of the authors of this report (<https://www.armidalecreeklands.org.au/history-reports>)
- Whilst we are interested in the possibility of interactive technology and public art, we caution that the value of such features are ‘in the eye of the beholder’ and so the community should be involved in deciding what is desirable with any such proposals.

Opportunities

- The scope of planning for water along Armidale’s creeklands needs to be expanded to include areas both upstream of Markham St, downstream of Douglas St and also tributaries of Dumaresq Creek such as Black Gully Creek and Martins Gully both of which flow through parts of the city.

- We note that the NSW Government’s New England North West Regional Plan 2036 aims in part for “A healthy environment with pristine waterways”. Surely this should encourage our community to strive to overcome legacy issues that have led to significant contamination in our creeklands environment - and help strengthen applications for funding from the State Government.
- As the Master Plan moves into planning and implementation phases, better outcomes could be realised if there were to be greater engagement with staff from the University of New England. In addition to the submissions to this Plan made by UNE experts in aquatic ecology, there would be benefits from input from senior management as well as disciplines and units such as geography, urban planning, crime prevention, hydraulic modelling, SportUNE, UNE Life, soil contamination, postgraduate students, UNE Landcare, etc.

Comments on recommendations:

We agree with all of the recommendations but make the following comments:

- Before the draft Creeklands Master Plan is endorsed by Council, we trust that it will be revised after consideration of the feedback received from the community during this public exhibition period.
- We agree with the proposal for a working group “of stakeholders (including external or transient organisations or users) to regularly meet to continue project momentum”. We trust that our association, Visions for Armidale Creeklands Inc, will be invited to have a ‘seat at the table’ together with many other interested parties. This is part of the solution we seek for a more transparent approach to planning issues that affect the community (we are pleased with the recent examples of a more consultative approach taken recently by the current Administrator of Armidale Regional Council).
- We suggest that, as Council develops proposed plans for implementation, that community meetings be held to ensure that the community is brought along on what hopefully will continue to be a shared journey.
- Regarding Recommendation 9: In December 2019, our association made a carefully prepared and detailed submission to the Armidale Regional Plan 2040 which was seeking to take a broader and longer term view of the future directions of the city and region. We understand that this planning process has been curtailed, perhaps for good reason. However, in the interests of transparency, we suggest that Council make available (perhaps via the Council website) copies of all submissions made to the consultants so that these past efforts of many in the community - developed with great commitment and energy - are not discarded/wasted. This would allow all those interested to get a more holistic view of what the Armidale Regional community aspires to over a 20 year horizon and the importance of the creeklands to the city and region.

Evidence in support of our submission

We have had valuable feedback from members of our association who have endorsed a draft of these responses.

In addition, we sought responses from the community Facebook audience.

The following Facebook post of September 9, 2020 (results at September 16, 2020) revealed a very high level of positive sentiment from the community that the draft Creeklands Master Plan has been released for comment. As shown in the image below, zero negative feedback was received to this post. Of course, that does not mean that respondents had read the draft Plan, rather that they liked the fact that a draft Plan had been prepared and released for comment.

Visions for Armidale Creeklands

Published by Jim Scott [?] · 6d · 🌐

⋮

Have you commented on the 114 page draft Creeklands Master Plan for Dumaresq Creek yet? If you don't have time, why not join our association to add your voice as we prepare our responses by September 17? We will send any new members our draft for you to comment on. We aim to develop a consensus of Visions from ALL parts of the community. If not you, who? If not now, when?
<https://www.armidalecreeklands.org.au/joinus>

7,700
People Reached

3,115
Engagements

[Boost Again](#)

Boosted on Sep 9, 2020 Completed
By Jim Scott

<p>People Reached 1.1K</p>	<p>Post Engagement 193</p>
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[View Results](#)

👍❤️ Colette Morrissey, Ian Smith and 18 others
1 Comment 3 Shares

👍 Like
💬 Comment
➦ Share
⋮

Performance for Your Post

7,700 People Reached

115 Reactions, Comments & Shares

41 Like	19 On Post	22 On Shares
7 Love	1 On Post	6 On Shares
64 Comments	8 On Post	56 On Shares
3 Shares	3 On Post	0 On Shares

3,000 Post Clicks

1,602 Photo Views	120 Link Clicks	1,278 Other Clicks
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NEGATIVE FEEDBACK

0 Hide Post	0 Hide All Posts
0 Report as Spam	0 Unlike Page

Insights activity is reported in the Pacific time zone. Ads activity is reported in the time zone of your ad account.

Our association’s Facebook post of September 12, 2020 (results at September 16, 2020) specifically sought feedback on our concerns about the lack of support in the draft Plan for any instream water bodies.

Post Details
✕

Visions for Armidale Creeklands

Published by Jim Scott [?] · 3d · 🌐

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To save you the read of the 114-page draft Creeklands Master Plan, your community group has prepared a response. Whilst we think it is commendable and comprehensive, we question the lack of support for any instream water bodies.

Our association wants to see the investigation and design of safe instream water bodies along the creeklands. Armidale already has examples of successful constructed instream water bodies such as the wetland in the Mike O’Keefe woodland (cnr Kentucky and Kennedy Sts) which has become wonderfully ‘naturalised’ and also the pools created in Black Gully Creek behind NERAM (see images).

With careful design, and water engineering to restore the original water flows, we reckon that instream billabongs, riffles and wetlands can be created to provide healthy water flows along our extensive creeklands – without causing erosion or making flooding worse – and so enhancing the environment, recreation and economy for all in our city.

Please give us a Like if you agree with these sentiments.

Performance for Your Post

1,693 People Reached

86 Reactions, Comments & Shares 👤

71 Like	62 On Post	9 On Shares
1 Love	1 On Post	0 On Shares
10 Comments	9 On Post	1 On Shares
4 Shares	4 On Post	0 On Shares

384 Post Clicks

186 Photo Views	0 Link Clicks 👤	198 Other Clicks 👤
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NEGATIVE FEEDBACK

0 Hide Post	0 Hide All Posts
0 Report as Spam	0 Unlike Page

Insights activity is reported in the Pacific time zone. Ads activity is reported in the time zone of your ad account.

1,693

People Reached

470

Engagements

Boost Again

Boosted on Sep 12, 2020 Finishes today

By Jim Scott

<div style="border: 1px solid #ccc; padding: 2px; display: inline-block;"> <p style="font-size: 0.7em; margin: 0;">People Reached</p> <p style="font-size: 1.2em; margin: 0;">1.3K</p> </div>	<div style="border: 1px solid #ccc; padding: 2px; display: inline-block;"> <p style="font-size: 0.7em; margin: 0;">Post Engagement</p> <p style="font-size: 1.2em; margin: 0;">175</p> </div>
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[View Results](#)

👍❤️
62

8 Comments 4 Shares

👍
Like

💬
Comment

🔗
Share

🌐
More

This confirms very strong community support for our proposition and zero negative feedback.

Some of the comments made by the community include: “What a difference water makes, so harmonious with the plants and wildlife. Water in the Creeklands is a must.”; “The instream water bodies you have mentioned are wonderful.”; “The MO’K woodland is wonderful. It would be terrific to see something like that in the creeklands”.

We trust that Council will therefore take heed of this community feedback and modify the draft Creeklands Master Plan to incorporate our suggestion in this post, namely:

Our association wants to see the investigation and design of safe instream water bodies along the creeklands. Armidale already has examples of successful constructed instream water bodies such as the wetland in the Mike O’Keefe woodland (cnr Kentucky and Kennedy Sts) which has become wonderfully ‘naturalised’ and also the pools created in Black Gully Creek behind NERAM (see images).

With careful design, and water engineering to restore the original water flows, we reckon that instream billabongs, riffles and wetlands can be created to provide healthy water flows along our extensive creeklands – without causing erosion or making flooding worse – and so enhancing the environment, recreation and economy for all in our city.