

Draft Hunter Regional Plan 2016

I note that for the first time strategic planning for the Lower Hunter, Upper Hunter and Great Lakes is consolidated in this plan. My comments on this plan are:-

Failure to provide adequate protection for the environment

- The plan claims to have as a key priority to “protect the region’s most important asset, the environment”. But the plan is quite weak about how this will be accomplished
- Although the draft Plan identifies areas of high environmental value (Figure 11: High Environmental Values, p 46), it does not provide adequate protection for those areas (e.g. no-go zones and/or clear restrictions on impacting development). The Plan must clearly outline mechanisms for protecting or enhancing areas of high environmental value.

Evidence Underpinning the Hunter Plans

- It is unclear what evidence has been used to develop the draft Hunter Plans. We note that both the final Illawarra Regional Plan and draft Central Coast Regional Plan include a section titled ‘Developing the plan’ which outline the various studies, existing strategies and datasets that have underpinned the development of the plans. I strongly recommend that a similar section be included in the Hunter Plans.

Failure to resolve land use conflicts

- The draft Plan identifies a range of land use values including areas of high environmental value (Figure 11: High Environmental Values, p 46); Primary Industries (including Biophysical Strategic Agricultural Land, Equine Critical Industry Cluster and Viticultural Critical Industry Cluster) (Figure 9: Selected Primary Industries, p30-31); and identified and potential mineral resources (Figures 5 - 8). However the draft Plan fails to resolve conflicts between these various uses and defers important strategic planning and impact management to a later stage.

Climate Change

- The draft Plan fails to adequately plan for climate change adaptation and mitigation. The only clear action in the plan is for the State Government to continue to support councils to consider the long term implications of climate change in decision-making. There should be more emphasis in the document on climate change risks as a constraint on development. The State Government has a responsibility to the community to map areas that will be impacted adversely by climate change and protect appropriate development controls for those areas. This is particularly important for floodplains, low lying coastal areas and high bushfire risk areas.

- Climate change is already changing our weather and all our lives. We want the Government to plan for sea-level rise, storm surges, changed rainfall patterns and provide for distributed energy, water and food systems so that our cities, suburbs and the bush are resilient to dramatic change. There is a fair bit about the Coastal reform process, but this is only responding to the hazard, not taking actions to reverse the changes.

Coal Industry

- The coal industry is in structural decline. We need a moratorium on all new coal mines and a plan for a just transition for the Hunter Valley. We also need firmer plans for rehabilitation of the damage the mines have done. We think the plans objective should be to provide for sustainable jobs and industry.
- The Valley needs permanent and absolute protection for the wine industry, thoroughbred industry, water resources, good farmland and villages from coal mines.
- Plans for a fourth coal terminal in Newcastle should be scrapped and we should plan to protect the world-renowned wetlands of Ash Island by adding them to the Hunter Wetlands National Park.
- The draft Plan identifies coal mining as an ongoing priority industry for the Hunter region. In light of the unequivocal evidence that the burning of coal contributes to anthropogenic climate change, and international agreement to keep global average temperatures to below 2 degrees Celsius, there needs to be greater emphasis on transitioning away from fossil fuels. Research from the University College of London indicates that over 90% of Australasian coal reserves would have to remain unburnt before 2050 to meet the 2 degrees C warming ceiling.
- The Hunter Regional Plan should prioritise a diverse economy that helps the region transition from the fossil fuel industry into new industries, including, for example, renewable energy.

Ramsar Sites

- There is no acknowledgement of two important Ramsar sites within this area. The Ramsar Convention [\[1\]](#) requires Contracting Parties to maintain the ecological character of their Ramsar-listed wetlands. This should be specific in this strategic plan.
 - Hunter Estuary wetlands Ramsar site consists of two components: Kooragang Nature Reserve, listed under the Ramsar Convention [\[2\]](#) in 1984 (and now part of Hunter Wetlands National Park), and the Hunter Wetlands Centre Australia [\[3\]](#), which was added to the Ramsar site in 2002.
 - Myall Lakes Ramsar site was listed in 1999. It consists of Myall Lakes National Park, Corrie Island Nature Reserve, Little Broughton Island Nature Reserve and part of Gir-um-bit National Park. Part of Port Stephens–Great Lakes Marine Park [\[4\]](#) is also within the Ramsar site.

National Park and Wilderness

- The importance of the extensive areas of National Park in the plan area should be greater recognised. There are large areas zoned as wilderness which need

protection. I recognise the need for active recreation areas for the expanding population and this is certainly recognised in the draft plan.

Biodiversity Offsets

- Biodiversity offsets have been used increasingly by both NSW and Commonwealth governments. Taken as a whole it is unlikely that the application of offsets to agricultural and development activity in NSW is improving or maintaining the preservation of nature.
 - An increasing number of offsets are offered in NSW as compensation for the environmental harm of development activity. These have no one single standard mechanism of delivery, regulation, oversight, verification or enforcement. It is in the public interest to have the number, location and character of offsets identified in an open and transparent manner.
- The draft Plan places too high an emphasis on biodiversity offsetting. Biodiversity offsetting is not appropriate in all circumstances. The draft Plan must identify 'red flag' areas (e.g. coastal catchments, areas of endangered ecological communities or threatened species habitat) that are not appropriate for biodiversity offsetting. If biodiversity offsetting is to occur, it must meet best practice principles that require 'like for like' offsets and no net loss of biodiversity.

Protection of Drinking Water Catchments

- There are a number of drinking water catchments identified in the Hunter region (Figure 14). In order to provide adequate protection for these areas all coal seam gas and long wall coal mining activities should be banned within the drinking water catchments.
- The requirement that any development should have neutral or beneficial effect on the region's water quality must be established in law (c.f. State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011).

Habitat connectivity

- The draft Plan identifies focus areas for sustaining regional habitat connectivity (Figure 12, p 52-53), however it relies heavily on private investment, mine rehabilitation and offsetting for maintaining habitat connectivity. These mechanisms should complement (not replace) clear protections for habitat connectivity and the protection of important wildlife corridors.

Failure to link catchment management planning and natural resource management

- The draft Plan fails to adequately integrate catchment management planning. It makes no reference to existing Catchment Action Plans (e.g. Hunter-Central Rivers Catchment Action Plan), or the goals and objectives within those plans.