



General Manager  
Hunter and Central Coast  
PO Box 1226  
Newcastle NSW 2300

24 March 2016

**Submission on *Draft Hunter Regional Plan* and *Draft Plan for Growing Hunter City***

Dear Sir/Madam,

The Nature Conservation Council of NSW (**NCC**) is the peak environment organisation for New South Wales, representing over 150 member societies across the state. Together we are committed to protecting and conserving the wildlife, landscapes and natural resources of NSW.

The Total Environment Centre (**TEC**) has been campaigning for environment protection in the city and country, changing government policy, advising the community and challenging business for over 30 years. TEC has been working to protect this country's natural and urban environment, flagging the issues, driving debate, supporting community activism and pushing for better environmental policy and practice.

The National Parks Association of NSW (**NPA**) is a not-for-profit conservation charity formed in 1957, seeking to protect, connect and restore the integrity and diversity of natural systems in NSW. NPA includes a network of 18 branches and more than 20,000 supporters.

We welcome the opportunity to comment on the *Draft Hunter Regional Plan* and *Draft Plan for Growing Hunter City*. These are important plans that will shape the future of the Hunter over the next 20 years and have significant impacts for the environment and communities.

Our organisations have previously raised concerns with the Department of Planning and Environment that the current roll out of Regional Plans is happening outside of a clear strategic planning framework. In our view, this does not provide a suitable basis for long term strategic planning that is consistent with the principles of ecologically sustainable development and which requires important environmental assessment and public participation.

We strongly recommend that the Government establishes mandatory requirements for strategic planning including proper environmental assessment, genuine community engagement and appropriate mechanisms for achieving environmental, social and economic outcomes.

Many of our members and supporters are concerned that regional plans prepared to date fail to resolve land use conflict or deliver robust protection for environmentally sensitive areas. There are also concerns that Regional Plans fail to adequately address key environmental challenges such as biodiversity loss, clearing of native vegetation and habitat, habitat connectivity, access to green space and infrastructure, population planning, air and water pollution, resource and waste management efficiency and impacts of climate change.

Our **enclosed** submission will outline in more detail:

1. Key concerns with the regional planning process and draft regional plans
2. Specific comments on the *Draft Hunter Regional Plan* and *Draft Plan for Growing Hunter City*

We strongly support improved strategic planning in NSW and hope to continue to work with Government to ensure that the planning system delivers improved outcomes for the environment and communities, now and for future generations.

Should you require any additional information, please do not hesitate to contact Cerin Loane, Policy and Research Coordinator, on (02) 9516 1488 or [cloane@nature.org.au](mailto:cloane@nature.org.au).

Yours sincerely,



Kate Smolski  
Chief Executive Officer  
Nature Conservation Council of NSW



Jeff Angel  
Executive Director  
Total Environment Centre



Kevin Evan  
Chief Executive Officer  
National Parks Association of NSW

# SUBMISSION ON THE DRAFT HUNTER REGIONAL PLAN AND DRAFT PLAN FOR GROWING HUNTER CITY

## 1. KEY CONCERNS WITH THE REGIONAL PLANNING PROCESS AND DRAFT REGIONAL PLANS

The Department of Planning and Environment (**DOPE**) is currently rolling out a new set of Regional Plans across eight regions of NSW. We have a number of overarching concerns with the process for developing the regional plans, and the failure of the plans to adequately address environmental challenges facing the regions and incorporate mechanisms for delivering improved environmental outcomes. Our key concerns with the new set of regional plans are outlined below.

### Lack of strategic planning framework

The current roll out of Regional Plans is happening outside of a clear legislative framework requiring mandated environmental assessment and public participation. In our view, this does not provide a suitable basis for long term strategic planning, including the proper consideration of vital long term issues such as ecologically sustainable development, biodiversity and connectivity, access to green space and infrastructure, climate change and population planning.

During the NSW Planning System Review process Moore and Dyer noted that:

*“During the course of the consultation process, a consistent theme was the lack of early strategic planning under the present planning legislation. A framework of strategic planning would inform local planning, apply across geographic areas wider than one council (potentially on a much wider basis than a small group of councils) and link with plans for infrastructure and its sequencing”.*

*“Two propositions were also near-universally supported across the spectrum of interests:*

- *express provision should be made for strategic planning in any new legislative framework*
- *such legislative provision should be accompanied by practical measures to encourage community engagement with, and participation in, the development of such strategic plans”.*

Moore and Dyer made a number of specific recommendations for strategic planning in a new planning system, including objects for strategic planning (Recommendation 8) and assessment of cumulative impacts (Recommendation 12 and 13)<sup>1</sup>.

Our 2012 report *Our Environment, Our Communities - Integrating environmental outcomes and community engagement in the NSW Planning System*, highlights the intrinsic link between land use planning and development, environmental protection, nature conservation and natural resource management<sup>2</sup>.

The report identifies a number of key elements for effective strategic planning, including:

- a whole-of-Government approach to strategic and land use planning,
- baseline studies of environmental and natural resource values to underpin strategic and land use planning,

---

<sup>1</sup> See further Chapter 4 of the Moore and Dyer report *The Way Ahead for Planning in NSW - Recommendations of the NSW Planning System Review*, Volume 1 – Major Issues, May 2012.

<sup>2</sup> Nature Conservation Council of NSW, Total Environment Center, EDO NSW, *Our Environment, Our Communities - Integrating environmental outcomes and community engagement in the NSW Planning System* 2012

- strategic environment assessment that includes mandatory consideration of prescribed environmental criteria, and assessment of cumulative impacts,
- sharing of data across sectors,
- consistency with other government strategies, including, for example, in the areas of natural resource management, transport, infrastructure and health,
- identification of competing land uses and values and mechanisms for achieving environmental outcomes,
- early, sustained and genuine community engagement in strategic and land use planning processes,
- appropriate statutory weight for, and hierarchy, between planning instruments.

Without a clear framework for strategic planning that mandates key requirements such as environmental studies and strategic environmental assessment, regional plans will fail to deliver the necessary environmental outcomes that are needed for an ecologically sustainable future.

We strongly recommend that the Government establishes mandatory requirements for strategic planning including proper environmental assessment, genuine community engagement and appropriate mechanisms for achieving environmental, social and economic outcomes.

### **Failure to effectively integrate environmental outcomes in land use planning**

Regional plans fail to adequately identify environmental targets or clear environmental outcomes that are to be achieved within the region.

We have previously recommended that to improve integration between regional planning, natural resource management and environmental protection, regional plans should incorporate environmental targets set by Government<sup>3</sup>. This is particularly important for achieving environmental outcomes at a regional/landscape scale.

Previous examples of targets that could be incorporated into regional plans include Catchment Action Plans targets or Natural Resources Commission targets. We are particularly concerned that the current Government seems to have moved away from setting targets for the environment (e.g. NRC targets have been abandoned, CAPs will be replaced with new Local Land Service plans).

The current roll out of regional plans is an opportunity for the Government to better integrate environmental outcomes within the planning system and ensure that regional plans support a whole of Government approach to achieving environmental outcomes at a regional scale. This is extremely pertinent given that other Government processes, such as the Biodiversity Legislation Review and coastal protection reforms, are looking to regional plans to achieve certain biodiversity and coastal protection outcomes<sup>4</sup>.

---

<sup>3</sup> See Nature Conservation Council of NSW, Total Environment Center, EDO NSW, *Our Environment, Our Communities - Integrating environmental outcomes and community engagement in the NSW Planning System* 2012

<sup>4</sup> For example, the Independent Biodiversity Legislation Review Panel (Recommendation 15) recommends that biodiversity objectives and priorities, including priorities identified in a statewide framework or strategy for conservation or in plans prepared by Local Land Services — are: (a) reflected in any new state planning policies prepared under the Environmental Planning and Assessment Act 1979 and (b) incorporated in Regional Growth and Infrastructure Plans and Subregional Delivery Plans, instead of in separate Regional Conservation Plans

### **Failure to provide adequate protection for areas of high environmental value**

We have significant concerns that the NSW planning system is failing to protect areas of high conservation value. In our experience, the Government has failed to implement mechanisms that provide absolute protection for areas of high conservation value (e.g. no-go zones, prohibitions), leaving matters to be considered with significant discretion on a case by case basis at the development assessment stage, where, more often than not, private economic interests outweigh other social and environmental interests.

The current roll out of regional plans is no exception. Although regional plans identify areas of high environmental value there are no clear mechanisms in place that provide protection for those areas (i.e. identification as an 'area of high conservation value' does not provide any additional protection).

Until the Government commits to providing real protections for areas of high conservation value these areas will continue to be impacted by inappropriate and unsustainable development and the number of threatened species and endangered ecological communities will continue to increase.

### **Failure to resolve land use conflicts**

On a number of occasions, the Government has suggested that upfront strategic planning will identify and better balance competing interests and resolve land use conflicts, however we have failed to see strategic plans or planning reforms achieve this to date (e.g. Strategic Regional Land Use Plans, NSW Planning System Review).

Although Regional Plans identify a range of land use values including areas of high environmental value, primary industries, agricultural land, drinking water catchments and mineral resources, they fail to resolve conflicts between these various uses and defer important strategic planning and impact management to a later stage.

### **Heavy reliance on biodiversity offsetting**

Regional plans place too high an emphasis on biodiversity offsetting. Biodiversity offsetting is not appropriate in all circumstances, and should not be seen as a mechanism for justifying high impact development that will destroy areas of high environmental value (e.g. endangered ecological communities, threatened species habitat, wildlife corridors).

We have significant concerns that the existing NSW Biodiversity Offsetting Policy for Major Projects does not meet best practice principles for offsetting, and remain concerned with proposals to expand the use of that policy under new biodiversity conservation legislation. If biodiversity offsetting is to occur, it must meet best practice principles that require 'like for like' offsets and no net loss of biodiversity.

Further, certain areas must be off limits to offsetting (e.g. 'red flag' areas such as coastal catchments, areas of endangered ecological communities or threatened species habitat), and regional plans are one mechanism that could be used to identify those 'red flag' areas.

### **Failure to adequately address climate change impacts**

Regional plans fail 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 Regional Plans on climate change risks as a constraint on development. The Government has a responsibility to the community to map areas that will be impacted adversely by climate change and implement appropriate development controls for those areas. This is particularly important for floodplains, low lying coastal areas and high bushfire risk areas.

## **Action plan v final strategic planning document**

The Regional Plans identify 'Actions' to be carried out, including substantial further work to inform strategic planning outcomes (e.g. establish further strategies, undertake further mapping, develop new methodologies etc.), rather than outcomes to be achieved and mechanisms for achieving those outcomes. That is, Regional Plans read more like a work plan for undertaking further strategic planning work rather than a final strategic planning document that will deliver agreed environmental, social and economic outcomes.

Consideration should be given to using the current iteration of Regional Plans as intermediary documents for undertaking further strategic planning work, and informing a further set of regional planning documents that aim to resolve land use conflicts, establish clear outcomes and targets, and establish mechanisms for achieving those outcomes and targets.

## **2. SPECIFIC COMMENTS ON THE *DRAFT HUNTER REGIONAL PLAN* AND *DRAFT PLAN FOR GROWING HUNTER CITY***

In addition to our overarching concerns with Regional Plans outlined in Part 1, we provide the following specific comments on key aspects of the *Draft Hunter Regional Plan* and *Draft Plan for Growing Hunter City*.

### **DEVELOPMENT OF THE PLANS**

The Draft Plan suggests that it has been prepared after considering community and stakeholder input to the *Upper Hunter Strategic Regional Land Use Plan* and the *Your Future Lower Hunter Discussion Paper*, and targeted research for the Australian and NSW Governments' joint regional Sustainability Planning initiative for the Lower Hunter. We are concerned however that there is no detailed information about the outcomes of consultation, including what issues have been raised and how the Draft Plan responds to those issue.

In particular, we are concerned that:

- Submissions and feedback made on the 2014 Discussion Paper are not publically available and no consultation summary report has been prepared;
- There has been no explanation of how feedback received during consultation has informed the Draft Plan;
- There has been little ongoing consultation with key stakeholders and local community groups in the period between the Discussion Paper and draft Plan;
- It is unclear how the feedback received during consultation on the Discussion Paper has been taken into account.

We do not believe that this reflects genuine and meaningful community engagement. Effective strategic planning requires significant investment in community engagement and buy-in from the local community. It is not enough to simply seek feedback from the community as a 'tick-the-box' exercise, without properly considering or responding to feedback. It is important that DOPE acknowledges and responds to key issues raised during consultation and helps the community understand how final decisions have been made. We strongly encourage DOPE to ensure the community is aware of how feedback into the regional planning process has been dealt with, prior to the Hunter Plans being finalised.

## GOALS

The *Draft Hunter Regional Plan* and *Draft Plan for Growing Hunter City* identify four regional goals:

- Regional Goal 1 – Grow Australia’s next major city
- Regional Goal 2 – Grow the largest regional economy in Australia
- Regional Goal 3 – Protect and connect natural environments
- Regional Goal 4 – Support robust regional communities

We provide the following feedback in relation to these goals:

- The draft Plans continue to identify coal mining as a key industry for growing the regional economy for the Hunter. As noted in more detail below, 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.
- For the purpose of achieving Regional Goal 3, the plan states that ‘a balance will be struck between the use of resources and the need to protect the environment and growth’. We are concerned that current policy settings (e.g. NSW Biodiversity Offsets Policy for Major Projects, Mining SEPP) do not provide the appropriate balance needed to protect the environment. As outlined elsewhere in our submission, the planning system must provide stronger mechanisms for delivering improved environmental outcomes.
- A number of villages within the Hunter region are significantly impacted by coal mining projects or threatened with impacts from proposed coal mining projects (e.g. Bulga, Wollar, Camberwell). The draft Plan does not provide adequate action for managing the future impacts of coal mining on these villages, or other Hunter communities, into the future.

## 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<sup>5</sup>. We strongly recommend that a similar section be included in the Hunter Plans.

## AREAS OF HIGH CONSERVATION VALUE

As noted in Part 1, we have significant concerns that while regional plans identify areas of high environmental value (Hunter Regional Plan, Figure 11: High Environmental Values, p 46) there are no clear mechanisms in place that provide protection for those areas. Until the Government commits to providing real protections for areas of high conservation value these areas will continue to be impacted by inappropriate and unsustainable development. This is especially the case in the Hunter Valley, where we have seen large swathes of native vegetation, including endangered ecological communities and threatened species habitat, destroyed for open cut coal mining.

---

<sup>5</sup> For example, page 12 of the *Illawarra Regional Plan* identifies a wide range of evidence that underpins the Regional Plan including the Illawarra and South Coast Regional Strategies, South Coast Regional Conservation Plan, Illawarra Biodiversity Strategy and Action Plan, Mapping of regional corridors, Urban Feasibility model – Illawarra, Review of Illawarra Housing Markets, Illawarra Industrial lands Study, Infrastructure for Illawarra’s economic future, State Infrastructure Strategy

## **RAMSAR WETLANDS**

We note that the draft Plans do not specifically acknowledge two important Ramsar sites in the Hunter Region: Hunter Estuary Wetlands and Myall Lakes. The Regional Plan must include clear actions for ensuring that the important values of these Ramsar sites are protected in accordance with international obligations.

## **LAND USE CONFLICTS**

The draft Hunter Regional 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 it fails to resolve conflicts between these various uses and defers important strategic planning and impact management to a later stage.

In the case of the Hunter, this is particularly important given the significant conflict between existing industry (e.g. mining, thoroughbred horse breeding, viticulture, oyster farming), agriculture and high conservation areas.

## **HABITAT CONNECTIVITY**

The *Draft Hunter Regional Plan* identifies focus areas for sustaining regional habitat connectivity, including corridors established in earlier strategies including the Lower Hunter Regional Strategy 2006-2031 and National Great Eastern Ranges initiative (Figure 12, p 52-53). While we welcome the identification and protection of important habitat and wildlife corridors we are concerned that the protection of corridors relies heavily on private investment, mine rehabilitation and offsetting for maintaining habitat connectivity. These mechanisms should complement (not replace) clear legal protections for habitat connectivity.

## **COASTAL PROTECTION**

Three of the five proposed Hunter Districts are situated on the NSW Coast. Substantial evidence is available to show that many of our spectacular, yet sensitive beaches, headlands, rocky shores, coastal wetlands, estuaries, bays and lakes are significantly degraded, and at risk of becoming further degraded if not effectively protected and managed into the future. Increased urban development and other uses are placing intolerable demands on sensitive coastal environments. The social and economic wellbeing of coastal communities including industries such as tourism, fishing and oyster farming are also potentially under pressure, being dependent on healthy coastal environments.

The Draft Hunter Regional Plan recognises that the Government is currently proposing significant changes to the State's coastal protection laws (*Draft Hunter Regional Plan*, p74). We suggest that draft Regional Plans anticipate future coastal planning requirements, and incorporate necessary actions and outcomes to meet future coastal management initiatives.

While we generally support the Government's efforts to improve coastal protection mechanisms, we are concerned that important climate change risk assessment and management in coastal areas is being left to local councils. We believe there is a role for the State and Federal governments to map areas that will be impacted adversely by climate change and implement appropriate development controls for those areas.



## GREEN GRID

We generally support the proposal to establish 'green' and 'blue' grids for the Hunter City that support biodiversity conservation, public transport, walking, cycling and recreation (p 15-17, *Draft Plan for Growing Hunter City*). We note the Green Grid Plan is yet to be developed, and suggest that this is prioritised prior to finalising other land use areas so that future planning incorporates Green Grid requirements.

## CLEAN AIR AND WATER

The *Draft Hunter Regional Plans* states that "The city will provide the essentials – clean air and water (p 15)", however there is no explanation of how this will be achieved. In particular we note our concerns in relation to drinking water catchments and air pollution:

- **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).

- **Air pollution control**

The *Draft Hunter Regional Plan* asserts that the NSW Government "already closely manages the mining industry" through pollution reduction programs, requiring 'best practice' pollution control and requiring strategies to control blast fumes from open cut coal mines (Action 2.4.4 p.41-43). There are no proposed measures to strengthen air pollution control. In reality, open cut coal mines routinely expose community members to blast fumes and concentrations of particle pollution exceeding national standards. Emissions from coal mines have doubled in the last 5 years.

The Regional Plan must include measures to control air pollution that include prosecution for pollution events and rejecting applications for new pollution sources (e.g. expanded and new coal mines) where air pollution concentrations already exceed national standards.

## CLIMATE CHANGE

As noted in Part 1 of our submission, the only clear action related to climate change within the Hunter Regional 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 implement appropriate development controls for those areas. This is particularly important for floodplains, low lying coastal areas and high bushfire risk areas.

## TRANSITION FROM FOSSIL FUEL INDUSTRY

The draft Plans identify 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, a significant decline in thermal coal prices, and international agreement to keep global average temperatures to below 2 degrees Celsius, it is irresponsible to continue to identify the coal industry as a priority industry<sup>6</sup>. There needs to be greater emphasis on transitioning away from fossil fuels.

The Hunter Regional Plan should prioritise a diverse economy that helps the region transition from the fossil fuel industry into expanded existing industries (e.g. viticulture, tourism, thoroughbred industry) and new industries (e.g. renewable energy). The draft Hunter Plan already recognises that previous studies indicate that the Hunter has the potential to supply energy to NSW through renewable energy sources (Draft Hunter Regional Plan, p 19) and this presents an important opportunity for transitioning away from the heavy reliance on fossil fuels in the region.

## MANAGEMENT OF FINAL MINE VOIDS

We have significant concerns with the extent of final mine voids in the Hunter post-mining landscape. Mine voids can have significant long-term impacts on water due to elevated water acidity and high salinity. There are also concerns in relation to the cumulative impacts of final voids in the Hunter landscape.

These concerns have been recognised by the NSW Planning Assessment Commission (PAC) who does not accept that a mining legacy of large voids across the Hunter landscape is acceptable. The PAC recommended that a study should be undertaken by Government as a matter of priority to review the cumulative impacts of voids in the Hunter Valley including the impacts of these voids on the short, medium and long-term on the water table and on the future of agriculture and other associated industries in the Hunter Valley<sup>7</sup>.

Further, questions arise as to why mining companies are permitted to leave final voids in the landscape rather than properly fill and rehabilitate these areas.

Professor Phillip Geary, University of Newcastle, made the following statement in 2015:

*“The question is: why aren’t these miners required to fill in their final voids as a matter of course, as part of the government approved mine rehabilitation plan? One word: cost. ... The regulators now accept that mine voids are to remain in the landscape once mining ceases... The cost to rehabilitate the final void should be borne by the industry that has earned income from digging up and selling the coal. It should no longer be acceptable to leave a large hole in the ground as a legacy”<sup>8</sup>.*

We agree with these sentiments. By allowing final voids, the user (in this case the mining company) is not paying for the environmental legacy left behind after open cut coal mining– the miner takes the profits and leaves the environmental costs to the State, funded by future generations of NSW taxpayers. It is a clear contradiction of the principle of intergenerational equity to approve an open cut coal mine void without requiring the funds for proper rehabilitation of the site from the proponent. It ultimately leaves the costs of the future management of mine voids to be borne by future generations.

---

<sup>6</sup> We note that 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.

<sup>7</sup> NSW Planning Assessment Commission, *Warkworth Continuation Project Review Report*, 4 March 2015,

<sup>8</sup> See <https://theconversation.com/disused-mines-blight-new-south-wales-yet-the-approvals-continue-39059>

It is clear that simply accepting final mine voids as part of the post-mining landscape is inconsistent with the principles of ecologically sustainable development, in particular, the precautionary principle and intergenerational equity.

We strongly urge the Government to implement a strategy to review the cumulative impacts of voids in the Hunter Valley and manage the short, medium and long-term impacts of these voids on the water table and on the future of agriculture and other associated industries in the Hunter Valley.

## **ACCESSIBILITY AND PUBLIC TRANSPORT**

The current transport system in the Hunter region is highly car dependent, and has been significantly affected by the closure of the Newcastle rail line. The fragmented structure of the proposed Hunter City makes it even more difficult to support a sustainable transport system. The Hunter Plans should better identify opportunities for improving public transport system in the Hunter region.

We note that NCC member group, the Hunter Environment Lobby, has developed recommendations for a Hunter LinkRail that provides a route through the Hunter using the Cockle Creek – Kurri Kurri – Maitland route, using old mining rail corridors. This fits in with a high speed rail freight and passenger link from Melbourne to Brisbane.

## **ABILITY FOR LOCAL COUNCILS TO EFFECTIVELY DELIVER THE PLAN**

The draft Plan relies on ongoing implementation by 11 local councils, working with the NSW Government. Appropriate oversight is needed to ensure that the relevant local councils are acting consistently in order to implement the Plan.

Further, the draft Regional Plan was prepared without regard to the proposed local council amalgamations. If amalgamations go ahead, this could impact on the short term capacity of newly amalgamated local councils to deliver on the draft Plan.

## **IMPLEMENTATION OF THE HUNTER REGIONAL PLANS**

A Coordinating and Monitoring Committee will be established to implement the Hunter Regional and Hunter City Plans (p12, Figure 3), however there is no mention of how environment or community groups will be involved in the implementation of the Plans. This is in contrast to the Illawarra Regional Plan which identifies an Illawarra Environment and Resources Group as a relevant supporting group.

We strongly recommend providing a mechanism for relevant environment and community groups to be involved in the implementation of the Hunter Plans. This is particularly important as the draft Plans require important ongoing strategic planning work, such as establishing criteria for the assessment of new land release areas, planning the Hunter City's Green Grid, developing cumulative impact assessment methodologies, which should be carried out in consultation with the community.

In order to provide improved links with agricultural and natural resource management objectives, representatives from the relevant Local Land Services should also be included on the Coordinating and Monitoring Committee.

## ENGAGEMENT WITH LOCAL COMMUNITY ENVIRONMENT GROUPS

In February 2016, NCC hosted a community meeting of local member groups and supporters in the Hunter region, including the Hunter Branch of the National of Parks Association. Participants were highly engaged on planning and environment matters and had significant concerns that the draft Hunter Plans fail to respond to key challenges facing the Hunter region and provide adequate mechanisms for delivering environmental and social outcomes for the Hunter community.

Key issues noted by meeting participants include:

- Concern about local knowledge and existing plans being lost
- Inadequate discussions between DOPE and the transport department
- Poor correlation between maps and zones
- Concerns about inadequate evidence underpinning the plans e.g. desk top studies v on-ground surveys
- Unbalanced emphasis on housing, land release, property development
- No guidance for dealing with mine voids
- Lack of strategies for an end to mining, transition planning etc.
- No talk of new technologies, and renewables
- All of the area is covered by mining licenses
- No substance to governance structure
- CAPs have been abolished. No discussion of catchment planning and NRM
- Gap between NRM and regional planning
- High environment land mapping and agricultural land mapping has not been completed
- Air quality - other plans have better air quality strategies. Needs detailed air pollution objectives.
- Federal assessments and strategies have not been included in the plan
- Existing plan is used for pro-development changes to LEP, new plans be the same
- Tenure, not just zoning, as a better protection mechanism
- Over reliance on offsetting
- Need to identify land for solar infrastructure
- Governance – concerns that Government will establish Regional Planning Commissions under new Part 3B of EPA Act, which will have significant control over regional planning

We understand that a number of our member groups have engaged directly with DOPE regional planning officers in relation to the draft Plans and will be providing written submission on the draft Plans. We encourage DOPE to continue to engage with local environment groups and the broader community to address key concerns and recommendations before the Hunter plans are finalised.

A list of NCC members in the Hunter region can be found on our website: [www.nature.org.au/members/](http://www.nature.org.au/members/)