

DUBBO FIELD NATURALIST & CONSERVATION SOCIETY INC.



Fostering interest, knowledge and enjoyment in natural history and conservation since 1977

18 June 2016

NSW Department of Planning and Environment
Via online submission website

COMMENTS – DRAFT ORANA REGIONAL PLAN

The Dubbo Field Naturalist and Conservation Society Inc (Dubbo Field Nats) thank you for allowing the opportunity to comment on the Draft Orana Regional Plan (the 'Plan').

We offer the following comments on the draft Plan, based on the information provided:

1) Absence of a strategic plan for our environmental values and assets

We note that while some components of this Plan are underlain by separate strategies that allow well-articulated aims, descriptions and actions. These include Regional Plans around infrastructure, transport and the regional Agricultural Development Strategy.

What concerns us is that the environmental assets and values of our region are not similarly considered in a separate underlying plan. We see no overall objectives for the future of our region's environmental assets. This has resulted in vague, unmeasurable and underwhelming statements about the environment in this Plan.

We need an overall environmental strategy to support Direction 3.5 and other aspects of the report (e.g. land use conflicts). The former CMA 'Catchment Action Plans' went some way to fulfilling this function but were still not whole-of-government, quantitative and had many flaws. We should be aiming for an improved environment overall, not just managing our impacts as is proposed throughout the Plan. We ask the Department of Planning and Environment to give us residents something to aim towards – healthy rivers, biodiversity, aesthetic, air quality, water quality, tourism, can all be included.

Without such a strategy we feel this Regional Plan is overall very ad hoc and unable to set the future state of our environmental values.

2) Tourism

We support ACTION 1.4.3, particularly in relation to the untapped ecotourism potential of the area.

3) Action 2.2.1 Water Supply

The Plan references some projections of water supply deficiency – to a ‘*NSW Government (2016), State Infrastructure Strategy – regional NSW*’. However, upon searching for this reference document, it does not provide any detail or justification for the claims of massive water ‘deficiency’. This assessment seems at odds with:

- a well-documented and significant decrease in water demand for households in urban areas such as Dubbo,
- a more efficient irrigation industry with various modernisation schemes being completed,
- The Basin plan limiting human take for use (so effectively capping overall supply and therefore demand),
- greater volumes of environmental water for our river system’s health (or is the shortfall in environmental water?), and
- the latest Climate Change predictions around water availability not being particularly negative in terms of overall reductions in surface water volumes.

It is difficult to see why LGAs with small and in some cases declining populations such as Warren, Wellington and Mudgee would find themselves so deficient by 2036. We’d suggest this information needs to be better presented with actual needs of the LGAs, not broad sweeping statements that are unsubstantiated.

Additionally, the projects in that supporting report (*Macquarie River Valley – augmentation of Burrendong Dam or a re-regulating dam on the Macquarie River*) represent significant potential environmental impacts relating to increasing river regulation and human consumption of water, are inconsistent with:

- (1) Actions 3.4.1 and ACTION 3.5.2 of the draft strategic Plan
- (2) NSW’s signing up to the Murray Darling Basin Plan; and
- (3) the expectations of our community to have a healthy river system.

In summary, DFNCs cannot find appropriate justification nor evidence of proper environmental consideration given (so far) to the stated intent to increase river regulation and human water take from our already stressed river system. Our river is already strongly impacted by human use and further major impacts will not be supported by our communities.

4) Definitions Page 51 - COAL SEAM GAS – natural gas from coal seams.

We submit that this text should be enhanced to indicate that CSG is ‘unconventional’ gas, rather than what people know as ‘natural gas’ which is obtained through quite different means (conventional gas harvesting).

DFNCs commend the NSW Government for the buy-back of PELs in recent years. We do not support any unconventional gas mining (CSG mining) within this region, or generally in NSW due to the known impacts to water, land and biodiversity and unacceptably the high risk of unknown impacts to groundwater.

Action 3.2.3 Renewable energy

This section is excellent and the planners are to be commended. We’d like to see resources prioritised into these industries rather than non-renewable energy sources.

5) DIRECTION 3.5 Protect and manage the region's environmental assets

We are happy to see a section on this issue. Some comments about the actions:

- a. *ACTION 3.5.1 Facilitate improved access to quality information relating to high environmental values and use this information to avoid, minimise and offset the impacts of development on significant environmental assets* – a continued focus on better information about the landscape is to be applauded. However, no projects are listed and the responsibilities are not listed. We would propose there needs to be some detail of an actual project/program - and by who - to ensure this occurs. Please add this detail.
- b. *ACTION 3.5.2 Maintain healthy waterways and wetlands, including downstream environment* – This action appears out of date and needs to be updated. We note that no mention is made of environmental considerations within the Water Resource Planning process (DPI-Water) occurring at present, and no mention of the significant investment made into 'environmental water' recovery and management in our catchment. There is also no mention of actions to help the Macquarie Marshes (e.g. NSW LLS and NSW OEH actions), or of floodplain management planning that is underway.

6) Recreation opportunities

There appears to be no actions specifically relating to promoting recreational opportunities in the region. To continue to attract population from metropolitan centres we need to be attractive in this way. There are a myriad of untapped recreational opportunities in our region, and specifically from our point-of-view: active and passive opportunities in the environment.

Whether it is fishing, bushwalking, camping, boating, mountain biking or other aspects, these activities can provide additional value to local environmentally significant areas so we'd like to see something along these lines included – a recreational planning element (or assisting Councils to do so).

7) Consultation Opportunities

Here we have two main points:

- 1) We cannot see where environmental groups are included in further planning committees and discussions. We'd appreciate clarification on how community environmental values will be included in those processes.
- 2) The online map tool. We'd suggest this is a highly ineffective way to identify areas of high environmental, community or economic value. We would recommend the Department of Planning reconsider this approach. Efforts like the former CMA's INFERR process is far more thorough and representative. Please run a proper consultation process for this (face-to-face discussions), or at least use their data.

We are happy to provide further information on any points raised above and look forward to feedback to the community about further revisions of the Plan.

Yours sincerely,

Janis Hosking
President, Dubbo Field Naturalists and Conservation Society Inc
02 6887 2692 contact@dubbofieldnats.org.au