

Director Regions, Southern  
NSW Department of Planning and Environment  
PO Box 5475  
Wollongong NSW 2520

23 August 2016

### **NCC Submission on the Draft South East and Tablelands Regional Plan**

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.

We welcome the opportunity to comment on the *Draft South East and Tablelands Regional Plan*. This is an important strategy that will shape the future of South Eastern NSW over the next 20 years and will have significant impacts for the environment and communities.

We 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 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 South East and Tablelands Regional Plan*

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 us on (02) 9516 1488 or [ncc@nature.org.au](mailto:ncc@nature.org.au).

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'C. Loane', with a small dot at the end.

Cerin Loane  
Policy and Research Coordinator

# NCC SUBMISSION ON DRAFT SOUTH EAST & TABLELANDS REGIONAL PLAN

## 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,

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<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 Plan 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>.

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<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.

### **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 identified and potential 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.

### **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

work to resolve land use conflicts, establish clear outcomes and targets, and establish mechanisms for achieving those outcomes and targets.

There does not appear to be any financial or technical support from the NSW government to support the development and implementation of regional plans by Local Government. In order to properly implement regional plans there must be an increase in government regional staff support to ensure that the plan is actually delivered.

Further, a number of the actions relate to State-wide work that the State Government is already planning to do (e.g. implement the Integrated Mining Policy) or general work that State and local governments do in the usual course of planning (e.g. continue to work with councils to protect productive farmland).

## **2. SPECIFIC COMMENTS ON THE DRAFT SOUTH EAST AND TABLELANDS REGIONAL PLAN**

In addition to our overarching concerns with the regional planning process, we provide the following specific comments on key aspects of the *Draft South East and Tablelands Regional Plan* (Draft Plan).

### **DEVELOPMENT OF THE DRAFT PLAN**

We have significant concerns with the lack of community input into the development of the Draft Plan. The Draft Plan suggests that the only engagement that has occurred at the local level during its development has been with councils across the region. There is no indication of having consulted with community members, industry, or interest groups.

We do not believe that this reflects genuine and meaningful community engagement. Effective strategic planning requires significant investment in upfront community engagement and buy-in from the local community. It is not enough to simply seek feedback from the community on an already developed plan as a 'tick-the-box' exercise. Claims by this Government that it is improving community engagement in strategic planning are undermined by the realities of its regional planning process.

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 Plan being finalised. Information about NCC members groups in the South East and Tablelands Region is included at the end of our submission.

### **ECOLOGICALLY SUSTAINABLE DEVELOPMENT**

There is no mention of ecologically sustainable development (ESD) in the draft Plan. ESD is one of the objects of the *Environmental Planning and Assessment Act 1979* and must underpin strategic regional planning. We note that ESD has been referenced in the draft plans for other regions, although we have raised concerns that in most cases it is simply a cursory mention, and that ESD is not effectively operationalised in the plan. We believe that the principles of ESD should be a core part of the vision, goals and actions for the Plan.

### **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. South East Catchment Action Plan), or the goals and objectives within those plans.

Although the draft Plan is intended to replace the South Coast Regional Conservation Plan, it does not contain the same comprehensive detail on the environmental values of the South Coast or the initiatives for conserving those values.

## **AREAS OF HIGH CONSERVATION VALUE**

Although the Draft Plan identifies areas of high environmental value (Figure 4: Environmental Values, p 26), it does not provide clear mechanisms for protecting those areas (e.g. no-go zones and/or clear restrictions on impacting development). The Plan must clearly specify how the identified areas of high environmental value will be protected and enhanced. The plan should specify the major areas on the map where conflicts between conventional land use and conservation of high value environmental land could occur, and how these conflicts should be resolved.

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. We also note that many of these areas will be at greater risk of being cleared if the NSW Government's proposed biodiversity legislation is introduced<sup>5</sup>.

## **POTENTIAL LAND USE CONFLICTS**

The draft Plan identifies a range of land use values including areas of high environmental value (Figure 4: Environmental Values, p 26-27); Natural Resources, including Biophysical Strategic Agricultural Land and the Sydney Drinking Water Catchment, State Forest and existing Renewable Energy Projects (Figure 5: Natural Resources and Renewable Energy, p44-45); and current mining and mineral titles and exploration areas (Figure 6: Current Coal Mining Activities and Exploration Areas, p50 and Figure 8: Current Mineral Resources Titles and Exploration Areas, p54-55). However the draft Plan fails to resolve conflicts between these various uses and defers important strategic planning and impact management to a later stage.

We highlight some of our concerns with potential land use conflicts below.

### ***Sydney Drinking Water Catchment***

As shown in Figure 2 (p 8-9), the Sydney Drinking Water Catchment, which supplies water to close to 60% of the State's population, covers a large area of the Southern Tablelands landscape. It is important that the Draft Plan provides adequate protection for the region's important water resources.

While the Draft Plan recognises the role of the State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011 in protecting the catchment and indicates that the NSW Government has announced the cancellation and buyback of all petroleum exploration licences covering the Sydney Drinking Water Catchment, including the Special Areas, further action must be taken to provide certain long-term protection for the water supply. To that end, all coal seam gas and long wall coal mining activities should be banned in those parts of the region that form part of the Sydney Drinking Water Catchment and Special Areas.

### ***Coal Mining***

Direction 3.3 of the Draft Plan is 'Support the productivity and capacity of the region's mineral and energy resource land'. This has potential to conflict with other areas of the plan, including Goal 2 – Protect and enhance the region's natural environment, and as outlined above, we do not think the Draft Plan does enough to resolve potential land use conflicts.

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<sup>5</sup> See *The Future for Biodiversity in NSW – Environment groups' joint response to the consultation package of reforms to land management and biodiversity conservation in NSW*, June 2016 <[www.nature.org.au/media/213826/environment-groups-joint-submission\\_final-270616.pdf](http://www.nature.org.au/media/213826/environment-groups-joint-submission_final-270616.pdf)>

We are particularly concerned that the draft Plan fails to identify the urgent need to transition away from a coal mining economy. 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 Draft Plan should prioritise a diverse economy that helps the region transition from the fossil fuel industry into expanded existing industries (e.g. manufacturing) and new industries (e.g. renewable energy, tourism).

Action 3.3.2 (p 49) talks about “supporting sustainable growth of mining industries...”. With respect to the NSW coal mining industry (and thermal coal in particular), there is nothing sustainable about mining a finite resource such as coal at the cost of significant (and often irreversible) local environmental damage, particularly given its major contribution to climate change through the burning of coal for power generation. This contribution applies both in Australia and overseas (one third of the NSW emissions of greenhouse gases come from the combustion of coal locally for power generation).

In terms of the Southern Highlands and Tablelands regional landscape, Figure 6 (p 50) indicates coal exploration and production titles to the west and south west of Bowral and Moss Vale. There is a large amount of community opposition to the mining of coal in this area of productive agricultural land and highly scenic rural landscapes. The landscape is suitable for agriculture and tourism, not coal mining. In addition, the proposed underground coal mines are located within the Sydney Drinking Water Catchment. NCC believes that a genuinely independent assessment of any underground coal mine proposal in this area would be unable to meet the neutral or beneficial impacts on water quality required under the Sydney Drinking Water Catchment SEPP, and that all coal mining activities should be banned in those parts of the region that form part of the Sydney Drinking Water Catchment and Special Areas.

### ***Coal Seam Gas (CSG)***

Figure 7 (p 51) indicates where CSG exploration titles have been bought back by the NSW government in the Bowral-Moss Vale area, and page 46 suggests there are no current coal seam gas exploration licences in the region.

We recognise that CSG activities elsewhere in NSW have been responsible for significant environmental damage, lack of recognition of landholder rights and associated citizen unrest in areas like the North Coast, Pilliga and Gloucester areas. NCC believes that the CSG industry has lost the trust of the community and has therefore lost its social licence to operate in NSW<sup>7</sup>).

NCC believes that no further CSG exploration titles should be issued, in this or any other region of NSW.

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<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> See the recent NSW greyhound racing inquiry, where the NSW government has taken action based on a perceived loss of social licence for the greyhound industry. Pages 15-17 describe the concept of a ‘social licence’, mentioning mining industries as well as the NSW greyhound industry) <[www.greyhoundracinginquiry.justice.nsw.gov.au/Documents/Report-SCI-Greyhound-Racing-Industry-NSW-Volume-1.pdf](http://www.greyhoundracinginquiry.justice.nsw.gov.au/Documents/Report-SCI-Greyhound-Racing-Industry-NSW-Volume-1.pdf)>

## **RENEWABLE ENERGY**

The expansion of renewable energy projects in the region is strongly supported, as is the goal to ‘build community support for renewable energy’.

The map on pages 44-45 indicates that the South East and Tablelands region is particularly rich in sources of renewable energy, and the draft Plan recognises the abundance of renewable resources presents economic opportunities for further investment in the renewable energy sector.

While NCC supports the implementation of the NSW Renewable Energy Action Plan, we believe that more can be done to support renewable energy and begin the transition away from fossil fuels.

## **CLIMATE CHANGE**

The Draft Plan recognises climate change as a threat for the region, and identifies potential climate change impacts including higher temperatures, increased sea levels, changed rainfall seasonality, potential for increased intensity and frequency of extreme weather events, and increased risk of bushfires. It is imperative that ongoing implementation of the Plan provides clear, ongoing opportunities and action for addressing climate change impacts.

### ***Impacts of climate change on tourism in the region***

The general direction in the plan (p 32) for building the region’s resilience to natural hazards and climate change is supported. The Alpine Landscape provides 27% of the regional economic contribution to tourism, valued at a \$429 million per year. The main drivers are skiing and related winter sport experiences (p 40-41). This activity is also one of the most susceptible in Australia to the impacts of climate change. Research indicates that due to the effects of climate change, natural snow cover will become inadequate at 65% of sites in the Australian ski resorts by 2020<sup>8</sup>. The use of snowmaking to cover the loss of natural snow cover is not feasible due to cost and the lack of water availability. The Draft Plan fails to adequately acknowledge or plan for the implications of climate change on ski and winter sport based activities in the region.

## **FORESTRY**

As shown in Figure 2, pages 8-9, the Far South Coast landscape contains significant areas of State Forest. The South East region has experienced the most intensive logging of native forests in the State for many decades, driven by the woodchipping industry. Independent studies have repeatedly found that the Regional Forest Agreements for Eden and Southern Regions have not protected threatened species and have not even been profitable for NSW taxpayers. Forests are worth more as wildlife habitat, carbon stores and protectors of water and topsoils. Further Native forest logging in NSW imposes costs on the NSW taxpayer through the losses of the Hardwood Forests Division of the Forestry Corporation, which have averaged \$11 million per year in recent years (Australia Institute Report, 2016<sup>9</sup>). We strongly recommend that the Government develops a clear plan to transition to plantation timber and that the logging of native forests ceases.

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<sup>8</sup> C. Pickering & R. Buckley: “Climate Response by the Ski Industry: The Shortcomings of Snowmaking for Australian Resorts”, AMBIO, July 2010, V. 39, pp 430-438

<sup>9</sup> Rod Campbell, *Money Doesn’t Grow on Trees*, The Australia Institute <[www.tai.org.au/content/money-doesnt-grow-trees](http://www.tai.org.au/content/money-doesnt-grow-trees)>, March 2016

Community groups on the Far South Coast have developed a vision for the restoration of native forests in the Southern Forestry Region of NSW, known as the Great Southern Forest (GSF)<sup>10</sup>. The GSF seeks to restore native forests that have been degraded by logging, and to fund long-term, rewarding jobs in forest restoration and tourism via capitalising on carbon markets. This GSF is therefore also directly relevant to efforts to reduce greenhouse gas emissions in the region and NSW more broadly.

We also note that the National Parks Association of NSW (NPA) is currently developing a framework to utilise public native forests, currently being degraded by logging, to underpin the development of a world-class nature based tourism and recreation sector in NSW following the expiry of the Regional Forest Agreements from 2019. This plan uses a recreation planning tool, the Recreational Opportunity Spectrum, to site activities in the landscape according to their users' needs. This reduces conflict and increases user satisfaction which is a vital part of a high-value industry such as nature-based tourism, as well as protecting natural assets. This plan would increase opportunities for local government revenue and for jobs in the tourism and forest management sectors. NPA will launch this plan in late 2016.

## **KOALAS**

Action 2.1.3, which requires the preparation of a comprehensive koala plan of management for the koala population in the Cooma-Monaro LGA, is strongly supported. This is long overdue. We recommend that this plan is developed in consultation with the local community.

It is unclear however why Cooma-Monaro has been singled out when a number of other councils in the region have not yet prepared a koala plan of management under State Environment Planning Policy 44 – Koala Habitat Protection (SEPP 44). These include Snowy River, Bombala, Eurobodalla, Bega, Yass, Boorowa, Wingecarribee, Mulwaree (Goulburn-Mulwaree).

## **BIODIVERSITY CORRIDORS**

Protection of the regions biodiversity corridors is strongly supported (Action 2.1.2), including the Great Eastern Ranges Initiative. However the plan fails to recognise the importance of the existing network of TSRs as contributing to the network of corridors in the region.

## **TRAVELLING STOCK RESERVES AND ROUTES (TSRS)**

Travelling stock routes and reserves contain important remnants of woodland vegetation in the otherwise highly cleared wheat and sheep farming belt of NSW. Often, these remnants are the best examples of ecosystems and communities that are not well represented in the National Parks estate. The TSR network also contains many Aboriginal sites.

The Draft Plan makes only one minor reference to Travelling Stock Reserves in Young, Harden and Boorowa Local Government Areas. The Plan should provide more detailed information on the important environmental, social and cultural values of TSRs, and how those values can be protected. TSRs should also be identified as natural assets on the maps within the Plan.

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<sup>10</sup> See <http://greatsouthernforest.org.au/> for further information about the proposal for a Great Southern Forest

## HEAVY RELIANCE ON BIODIVERSITY OFFSETTING

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.

The statement on page 24, that the *NSW Biodiversity Offsets Policy for Major Projects* applies to all biodiversity in NSW, is incorrect. That policy only applies to the assessment of biodiversity impacts from major projects.

The Draft Plan does not acknowledge that significant changes to biodiversity offsetting are currently proposed as part of the Government's biodiversity and land management reforms.

## MARINE CONSERVATION

The draft plan talks about the development of a stronger marine-based tourism industry (p 42-43). The draft plan notes (p 40) that 40% of the economic contribution to tourism in the region comes from the Far South Coast.

An important component of marine-based tourism in the Far South Coast landscape is the Batemans Marine Park, which stretches from Batemans Bay to south of Narooma<sup>11</sup>. The Marine Park contains areas of lakes, estuaries and coastline which are particularly sensitive to environmental impacts. Development in these areas should take this sensitivity into account.

We also strongly urge the Government to restore full protections for the marine sanctuaries within the park<sup>12</sup>.

## BIOSECURITY

We support Action 3.2.2 (p 46) to manage biosecurity risks to protect the region's current and future industries.

However we are concerned that the draft Plan considers biosecurity risks in the context of agricultural assets only. We suggest that the draft Plan also recognise the potential biosecurity risks to the region's environment and natural assets. Biosecurity is at least as important to the environmental portfolio as it is to the agricultural one and considerably more challenging because of:

- The need to protect hundreds of thousands of species, and their populations and interactions that constitute ecosystems and ecosystem processes (in contrast, industry biosecurity is mostly focused on protecting a few particular economically valuable species).
- The irreplaceability of many conservation values under threat from invasive species (organisms of value to industry can usually be replaced by new breeds or new enterprises).

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<sup>11</sup> <http://www.narooma.org.au/batemans-marine-park/>

<sup>12</sup> In March 2013, the NSW Government announced an amnesty from prosecution for shore-based recreational line fishing from ocean beaches and headlands at 30 sites in the sanctuary zones of the five mainland marine parks. The NSW Government made this decision following consideration of a 2011 Independent Scientific Audit of Marine Parks and public submissions received both during and after the Audit. In December 2104 the amnesty was lifted for 20 of the 30 marine sanctuaries (i.e. full protection was restored), however the Government undertook further consultation in relation to whether shore-based recreational fishing should be allowed in the remaining 10 sanctuaries, including the marine sanctuaries of the Batemans Marine Park <[www.marine.nsw.gov.au/key-initiatives/ocean-beaches-and-headlands-assessment](http://www.marine.nsw.gov.au/key-initiatives/ocean-beaches-and-headlands-assessment)>

- The greater number and complexity of invasive species threats to environmental values than production values, and their interaction with other environmental threats (fire regimes, habitat fragmentation, climate change).
- The limited knowledge about biodiversity and invasive species threats to the environment and the long timeframes over which invasive species establish and spread.
- The often limited management options in natural environments and the lack of commercial incentives to manage environmental threats.
- The multitude of stakeholders, often with conflicting agendas, and limited resources compared to industry stakeholders.

We also suggest that the actions identified in the draft plan may be ineffective if just left to local councils to implement. Outside their traditional statutory area of noxious weeds, local councils have little to no biosecurity expertise and no statutory responsibility for biosecurity. We suggest that there is a need for both the Local Land Services and Office of Environment and Heritage to work closely with councils to minimise biosecurity risks for current and future industries, and the environment.

## **RESOURCING**

There has been an ongoing decline in Government support for regional areas, with many regional areas and agencies lacking necessary staffing or expertise to achieve improved environmental, social and economic outcomes. Many of the actions identified in the draft Plan require ongoing collaboration between the NSW Government and local councils, and further work to develop and implement plans and strategies within the region. Substantial additional support and resourcing will be required to ensure regional agencies and local councils have the necessary capacity to deliver the plan.

## **IMPLEMENTATION OF THE DRAFT PLAN**

The Draft Plan indicates that delivery of the plan *“requires ongoing commitment from all stakeholders, including councils, State agencies and the development and services sectors”* (p 13). However, there is no recognition of community members, industry and interest groups as being important stakeholders in delivery process. Rather, the delivery of the final Plan will be by the Coordinating and Monitoring Committee, made up of Government and local government representatives determined by the Joint Organisation of Councils. NCC suggests that there should be equal representation between local and State government representatives.

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.

Consideration should also be given to community input into the implementation of the plan.

## **ENGAGEMENT WITH LOCAL COMMUNITY ENVIRONMENT GROUPS**

NCC has a number of member groups in the South East and Tablelands region, including Climate Action Now Wingecarribee, Friends of the Mongarlowe River, Goulburn Field Naturalist Society, Kosciuszko to Coast, National Parks Association - Far South Coast Branch, Palerang Local Action Network for Sustainability (Future PLANS), Robertson Environment Protection Society, South East Region Conservation Alliance, Tarlo/Middlearm Landcare Group, The Coastwatchers Association, The Goulburn Group, and Wingecarribee Landcare/Bushcare Network.

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

Contact details for NCC members in the region can be found on our website: [www.nature.org.au/members](http://www.nature.org.au/members)