



Hunter Offshore Renewable Energy Area Submission

Norah Head National Surfing Reserve Stewardship Committee: June 2023

Norah Head National Surfing Reserve (NHNSR) is a key stakeholder affected by the proposed Hunter Offshore Renewable Energy Area (HOREA). However, the consultation process for the Central Coast area of the zone was flawed and insufficient, failing to provide a genuine opportunity for the community to have appropriate and meaningful consultation. NHNSR was not identified as a critical stakeholder in the process or consulted.

A National Surfing Reserve accreditation signifies an "iconic" place of intrinsic environmental, heritage, sporting and cultural value to a nation, which satisfies three crucial criteria:

1. High-quality surfing waves.
2. A place considered sacred by the local and national surfing community.
3. A significant long-term history of the beach and wave environment being used by the local and national surfing community, including First Nations People, surf life-saving clubs, board riding, and any other clubs in the community.

The NHNSR was dedicated on the 26th of November, 2022, after two years of working with the key stakeholders and the community. It is the 23rd such Reserve and the only one on the Central Coast of NSW. This accreditation recognises the area's pristine coastline and classic, world-class breaks offered in the NHNSR. This unique ribbon of coastline includes nine beach breaks, two-point breaks, three bomboras and two reef breaks. It has nurtured State and National champions on both shortboards and longboards. It is cherished by both locals and visitors alike. The NHNSR has received endorsement in both the Federal and State Parliament.

NHNSR supports Australia's and many of the world's leading countries' target of net zero by 2050 and responsible, effective, and adequately considered clean energy initiatives by governments, businesses, and the general community. We also acknowledge the Australian Prime Minister's international leaders' pledge to take decisive action on the dual crisis of biodiversity loss and climate change, working together to protect and conserve the world's land, sea, waterways and cultural heritage for future generations. However, pursuing a clean environment CANNOT be at the cost of the environment itself, particularly the unspoiled coastline and classic breaks offered in the NHNSR

The NSW Department of Lands, fully supports the National Surfing Reserve initiative and has been working in partnership with communities and the National Surfing Reserves Board to create these reserves under the Crown Lands Act 1989.

NHNSR's mission is to act as stewards of the beaches, breaks and dunes to preserve Norah Head's rich surfing culture and heritage for future generations. We intend to support the respectful and sustainable use

of the fragile coastline from Hargraves Beach to Pelican Point by promoting the values of: "SHARE, RESPECT, and PRESERVE" in the community.

As such, we respectfully request the following:

- Undertake proper consultation with affected key stakeholders before the offshore renewable zone is declared.
- Exclude the sensitive NHNSR area from the offshore renewable zone off Norah Head to minimise the impact on our unique and vital surfing resources.

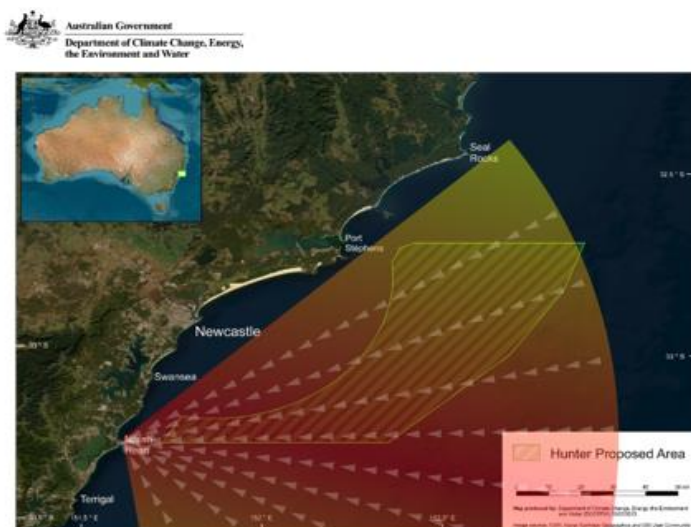


Figure 1 shows how swell travels from all directions into Norah Head. The Zone must ensure no loss of swell.

Generation of swell is complex and incredibly fragile, requiring a delicate and perfectly balanced set of conditions, including, among others, groundswells (long-period groups of waves generated by distant storms travelling thousands of kilometres) and geomorphological features of the seabed and the shore, such as the presence of reefs, headlands, bombooras or sandbars. Wind is critical also. These elements are subject to changes that can result in the deterioration or complete loss of surfing amenities, as documented by a growing number of observations over the last decade.

- Ensure proper ongoing consultation processes before feasibility licences are assigned to prospective developers. Without details of the onshore and offshore infrastructure likely to be required, there is insufficient appreciation of the potential damage to NHNSR. The swell could deteriorate to such an extent that NHNSR would no longer meet the criteria to be dedicated as a National Surfing Reserve.

Concerns relevant to the National Surfing Reserve to be considered:

1. **Public Amenity.** Is NHNSR the only Surfing Reserve in the world to have a back-drop of wind turbines? NHNSR was selected as a National Surfing Reserve due to its exceptional surf quality combined with its rich history of surfing and the preserved natural beauty of the small Norah Head "village". There are few houses or roads in Norah Head and no industrial development. The industrialisation of the sea by placing over 100 floating turbines at heights of 350m, starting at only 10km offshore, will overshadow the land and seascapes. The turbines will dominate and detract from the untouched beauty of the area.

2. **Environmental impact assessment.** Guidance on environmental impact assessment of offshore renewable energy development on surfing resources and recreation compiled by *Surfers Against Sewage* draws upon publicly available information, including academic research, EIA reports, and SEA reports to highlight the following concerns:



- There is the potential for offshore renewable energy development to impact **surfing wave resources** as a function of the magnitude of the change in wave climate and the distance between the offshore development location relative to the local surfing breaks.
- **Changes to offshore wave climate** may occur, typically identified as loss of the wave energy transmitted shoreward after waves have passed through a development site. The loss of wave energy transmitted primarily causes a reduction in wave height and, to a lesser extent, causes an irregularity in the wave period. For offshore wind farms, wave energy transmission is reduced by the energy absorbed and re-directed by turbine towers and their foundations. The designs and sizes of foundations are the principal factors influencing an offshore wind farm's potential to change wave climate. A study of the *Rampion* offshore wind farm showed a potential reduction in wave height of up to 22% for surfing beaches around Brighton before consultation and crucial intervention in the process.
- **Impacts on surfing break resources** can occur when offshore renewable energy development alters the hydrodynamic conditions - the tidal flows, wave climate and sedimentary environment conditions - sediment erosion, transport patterns and deposition, to such an extent that nearshore sedimentary bedforms, the sand bars and beaches, change in the surf zone in such a way that they change the characteristics of the surfing waves that break there.
- Overseas studies have also identified possible **impacts on surfing recreation**. The quality and consistency of surfing waves are two of the most important factors influencing the experience and participation in surfing recreation. Some of the key concerns the surfing community expresses relate to the direct impact on surfing by reduced nearshore wave heights and the effects of the wind farm devices on the wave period, which could lead to losses of the "clean" longer-period swells that surfers enjoy.
- The importance of surfing wave quality is also fundamental to the **economic value of surfing**. Worsened surfing conditions would be the most significant single factor that would reduce surfing recreation and its economic benefits to the community of Norah Head. Tourists and surfers are attracted to the Norah Head area because of the pristine breaks and beaches lovingly watched over by Norah Head Lighthouse.

3. Impacts on Mental Health and Physical Health. Positive mental and physical health outcomes are well documented in academic literature in relation to surfing. Surfing is the second-most practised water-based sport and among the top five nature-based physical activities. Programs like Man Anchor, the Disabled Surfing Association and the Veterans Surf Project promote mental health by "saltwater healing". Any reduction in swell correlates to a decrease in surfing activity that, in turn, impacts people's physical and mental health.

NHNSR expectations:

Stage 1: Genuine stakeholder consultation. Communication must be transparent, accurate, adequately notified, extensive, and across numerous channels. Traditional owners, locals, subject matter experts, local councils, business groups, and State representatives should be able to meet with informed members of the DCCEEW and relevant Ministers to discuss proposals and enable genuine, engaged consultation that is



proactively addressing the internationally recognised dual crisis of climate change and biodiversity loss. The Government must address Climate change through the lens of preserving fragile coastlines and iconic breaks

Stage 2: Exclusion of sensitive areas. The Government needs to lead in deciding what natural assets (such as the National Surfing Reserve) we must protect, excluding these areas from consideration, and assigning feasibility licences to experienced and financially suitable developers. NHNSR received endorsement in both Federal and State Parliament, and the Stewardship Committee needs to be allowed to honour their commitment to act as stewards for this unique Reserve. If the consultation does this, it will save significant resources for itself, developers, and communities in the future.

Stage 3: Proper ongoing consultation and process. A collaborative framework must be developed for implementation early in the process and then used for other sites around the Nation. The events and current situation with the Hunter Central Coast Offshore renewables zone highlight that the Department and Government continue with unreasonable, inappropriate, and inaccurate consultation. These issues must be addressed and corrected before the zones are formally declared and feasibility licences are requested and assigned to prospective developers.

Thank you for the opportunity to submit this critical proposal. We would like to meet with you to discuss further the concerns raised in this submission. We also invite you to visit our iconic and pristine NHNSR, experience the natural beauty, and yarn with us as we gaze over the spectacular reef, beach and point breaks.

Kind Regards,

Jill Secomb

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