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Dear Sir

### **Draft Central Coast Regional Plan**

Wallarrah 2 Coal Project (W2CP) is pleased to lodge this submission on the Draft Central Coast Regional Plan. W2CP supports the broad thrust of the Plan as a well-balanced and informed document to guide the important land use choices that can promote robust economic growth across a range of sectors while effectively managing current and future rural and residential amenity, agricultural land uses, and a range of natural environmental assets including water resources and biodiversity.

#### Introduction

Wyong Coal Pty Limited (WCPL) is the managing entity for the Wyong Areas Coal Joint Venture which holds coal exploration tenements and has lodged mining lease applications (MLAs) in the north of the Wyong local government area.

WCPL manages the Wallarah 2 Coal Project (W2CP) near Wyong on the NSW Central Coast which is well advanced in progressing through the assessment process for a State Significant Development (SSD) application for an underground coal mine. The Planning Assessment Commission has recommended the project for approval pending resolution of a land access issue for proposed rail facilities. The Project is working on resolving the land access issue.

#### Overview

W2CP has closely reviewed a variety of development plans and planning strategies at State, regional and local levels.

W2CP strongly supports this current Draft Central Coast Regional Plan (DCCRP) as it is a well-informed and high-level but comprehensive strategy which will guide regional development into the future. The DCCRP acknowledges and understands the important role of coal resource extraction for appropriate growth and diversification of the economy. The DCCRP is consistent with and builds upon previous regional and subregional plans so as to provide direction for informed land use management, especially regarding coal and clay resources which are acknowledged to have long term strategic importance to the region and beyond.

The attached notes provide specific comments on various goals, directions and actions set out under the DCCRP.

Should you have any need for further information, please contact the undersigned.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Peter Smith', written in a cursive style.

**Peter Smith**  
Environment and Community Manager

## Specific comments on the Draft Central Coast Regional Plan

### *Goal 2 – Grow and diversify the regional economy*

W2CP's efforts to establish a modern underground coal mine in the north of the region (refer [www.walarah.com.au](http://www.walarah.com.au)) are fully consistent with the DCCRP's aims, objectives and actions set out in *Goal 2* for economic development and diversification, employment opportunities, regional business development, infrastructure planning, and enhanced freight transport initiatives.

The location of the W2CP at Bushells Ridge can be a significant part of this emerging employment precinct and can assist the aim of developing a specialised industry cluster by attracting investment in support businesses that could be located nearby.

### *Action 2.1.2 - Support the business development needs of industry*

W2CP supports the proposal that "the NSW Government will ... work with councils and **industry** to prepare industry-specific planning strategies that support growth, and a regionally-consistent planning approach for tourism, agriculture and **other sectors**, as required." [bold added]

### *Action 2.1.4 - Coordinate infrastructure delivery to meet changes in demand for industrial land*

This Action acknowledges that coordinated delivery of infrastructure is critical to creating a competitive economy. Conversely, poorly coordinated programs will present an unacceptable burden on economic advancement. The DCCRP notes that at the Bushells Ridge location there are a range of issues including infrastructure, biodiversity planning and mineral resources that require resolution.

W2CP is actively taking a balanced planning approach to ensure it can remain compatible with local land uses which include industrial development, clay extraction, proposed motor sport racing facility, transport (rail and road) and power infrastructure. W2CP's development application has demonstrated that effective biodiversity conservation can be maintained by industrial development using informed environmental planning approaches and modern industry practices.

W2CP supports the DCCRP's commitment that the "NSW Government will work with councils and servicing agencies to coordinate infrastructure planning and delivery for employment and commercial land".

### *Action 2.2.1 – Strengthen freight and commerce connections between the regional economic corridors and Sydney and the Hunter*

The DCCRP notes that while the trend for road freight volumes on the M1 Motorway between Sydney and Newcastle will increase by 79 per cent between 2011 and 2031, the "Northern Sydney Freight Corridor Program will increase rail freight carrying capacity between Newcastle and Sydney by 50 per cent, from 29 to 44 freight trains each day".

W2CP has committed to transport its coal product to Newcastle port by rail (not road) and has provided for significant infrastructure to ensure modern, efficient rail facilities and operations.

### *Action 2.6.2 – Resolve conservation issues*

W2CP's development application has minimised land clearing requirements and has committed to provide long term biodiversity conservation offsets on private land which is at least double the area of land cleared for the project.

*Direction 2.7 – Strengthen the economic self-determination of Aboriginal communities*

W2CP works closely with representative Aboriginal parties (RAPs) for archaeological and cultural heritage assessment and management as part of project planning and assessment.

W2CP also strives to assist local communities by way of various initiatives such as *the Wallarah 2 Foundation Community Grants Scheme*, which has seen over 40 local educational environmental and social projects funded under our annual grants program, and the *Walarah 2 Apprenticeships and Trainee Program* which is coordinated by Central Coast Group Training to deliver financial support for full-time and school based apprentices to undertake training and gain full or part time employment in organisations in the Wyong area. Aboriginal community members are recipients of some of these important funding programs.

A new initiative in 2015 has been the development of a Mutual Advancement Covenant (MAC) agreement between Wyong Coal and the Guringai Tribal Link Aboriginal Corporation, which includes those with links to the traditional indigenous people of the region's coastal lands. The MAC agreement provides funding and assistance from Wyong Coal for applicants from the local indigenous community under five schemes:

- Apprenticeships
- Business Start-ups
- Mentoring
- Guringai GreenTeam
- Scholarships

The first round recipients of the university scholarships and apprenticeships have commenced in early 2016 and other schemes are progressing with business planning and other initiatives scheduled throughout the year.

Another key element of the MAC agreement with Guringai TLAC is that W2CP is committed to a target of 10% indigenous employment in the project.

*Action 2.7.1 – Conduct a strategic assessment of land held by the region's Local Aboriginal Land Council to identify priority sites for further investigation of their economic opportunities.*

W2CP supports this action by the NSW Government to enable orderly planning and full consideration of potential development opportunities in the regional land use context so as to assist whole of the local indigenous community.

*Direction 3.1 – Promote investment in rural and resource lands*

W2CP strongly supports this Direction in order to ensure the strategic importance of the region's mineral resources (coal, clay, sand, gravel, coal seam gas, etc) are fully recognized and that they must be properly developed in accordance with environmental regulations so they can be an important pillar in the sustainable economic growth of the region's rural and resource lands.

While a major part of the Wyong region's development over more than a century has involved coal extraction for export and local uses such as power generation, it is important that these resources are continued to be accessed and are not sterilized. W2CP supports the continuation of the multiple land use approach which includes the important strategic planning function of the Mine Subsidence Board acting for the community, the Division of Resources and Energy in husbanding the State's coal resources, and the role of other agencies under the broader regulatory framework such as the planning and approval process.

*Action 3.1.3 – Plan for the ongoing productive use of lands with extractive resources*

W2CP agrees with the following comments expressed under this Action in the DCCRP:

- That parts of the Wyong Local Government Area (such as the North Wyong area where W2CP operations will occur deep underground) have coal resources that are within identified Mine Subsidence Districts and that these areas have the potential to be mined and surface facilities developed
- That as these local coal resources are located in close proximity to both Sydney and the Hunter region, they and the supporting freight networks are of strategic significance
- The potential short to medium term growth of the (coal) resource sector is limited to those areas with established infrastructure and resource accessibility; this includes the W2CP.
- The acknowledgment in the DCCRP of the current policies and programs in NSW such as the State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007 which includes coal seam gas exclusion zones that cover large parts of the Central Coast
- That while mining has specific operational needs that may compete with other users, mining can be effectively managed with the right regulation, engineering solutions and ongoing monitoring
- That the DCCRP recognizes that mining is ultimately a temporary land use and involves planning and management that takes into account the full project life cycle.

W2CP supports the commitment by the NSW Government to work with councils when preparing new local environmental plans or sequencing of land releases, to make sure that valuable resources are not sterilised.

*Action 3.2.2 – Manage future rural residential opportunities, where appropriate*

W2CP agrees with the DCCRP statements that

- Future rural residential development must not adversely impact on the natural environment, drinking water catchments, and agricultural and extractive resources activities.
- Where planning proposals for land use change are being considered in existing or known resource lands, councils need to consult the NSW Department of Industry's Mineral Resources Audit, and the exploration and mining activity maps, so they can consider the viability of the resource activity.

W2CP supports the commitment by the NSW Government to work with councils to assess the implications of new or sequenced urban release areas on existing and known resource lands. W2CP considers that this appreciation of the importance of protecting known resource lands must also apply to the related lands that provide access to and operation of mining-related infrastructure including transportation facilities.

*Goal 4 – Protect and manage the natural and cultural environment*

W2CP has been involved in coal exploration and project planning in the North Wyong region for over 20 years which has involved substantial scientific, engineering and environmental planning and assessment work. This has enabled a project plan for W2CP that addresses all reasonable community expectations and regulatory compliance requirements and which has been extensively scrutinized in public EIS documentation. The project has benefitted from continuous community engagement activity in not only evolving the project plan but also enabling improved understanding of its major potential contribution to the local and regional economy.

A major part of the environmental management planning for the W2CP has been the focus on ensuring the management of surface and subsurface water resources and protecting the drinking water supply, as well as maintaining the local amenity by way of stringent noise and emissions controls.

*Action 4.3.1 – Apply contemporary risk-management to coastal, man-made and other hazards*

W2CP acknowledges the statements in the DCCRP that:

- The “existence of economic coal reserves and a history of coal mining in the northern parts of the Wyong Shire mean that mine subsidence has to be considered in the new development and redevelopment of these areas.”
- “Suitable mitigation and management strategies for these hazards, such as surface controls for development in potential mine subsidence areas or buffers for development around road and rail corridors, will be identified and implemented through local planning”.

W2CP supports the commitment that the NSW Government will work with councils so that man-made hazards such as mining-related surface subsidence, land contamination, and road and rail noise are considered in future planning and development controls. W2CP recommends that the Mine Subsidence Board be given greater recognition under the DCCRP as having a significant planning, management and information coordination role on behalf of the community in the mining subsidence topic.

Wallarrah 2 Coal Project

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