



## THE COLONG FOUNDATION FOR WILDERNESS LTD.

Monday 30<sup>th</sup> May, 2016

Director Regions - Western  
Department of Planning and Environment  
PO Box 58  
Dubbo NSW 2830

Dear Sir/Madam,

### **Draft Central West and Orana Regional Plan**

The Colong Foundation for Wilderness obtained a copy of draft Central West and Orana Regional Plan from the Department's head office at Bridge Street in Sydney, but our copy did not contain a section on 'how you can be involved on the draft regional planning process and make a submission'. The omission of a how to comment section defeats the purpose of publication. As the Department of Planning and Environment (the Department) is well aware, it is the NSW Government's intention to encourage more public comment and review on strategic planning and less on the 'rats and mice' development proposals. Your written report fails to encourage submissions, so it fails the Government on this over-arching planning intention.

Further, the report is mostly a statement of the region's status quo, not a strategic planning report. The draft report tabulates current policies and practice but does not identify new policies for consideration. Again, this is virtually defeats the purpose of writing a regional plan.

The draft Regional Plan does have good aspects. It is stronger as a Regional Environmental Study, than a vision for the region's future. Defining the region's productivity and constraints creates the physical framework for a regional plan, but it does not make a regional plan.

Further, these framing constraints and opportunities contain glaring omissions, such as the Mt Piper Power Plant, and its daily consumption of 50 million litres of fresh surface water.

### **The contribution of coal mining to region's economy will decline**

Economic expansion will put more pressure on the region's diminishing water supplies due industrial expansion and global warming. The region's economic growth relies on mining and road transport development, as well as urban expansion but the physical and political constraints to growth are not adequately addressed.

The availability of water resources is the major constraint to growth, and more strategic work is required to develop water efficiency initiatives for this region. Urban and mining growth must be made more water efficient through less water use and more water reuse, as the region's water resources are already committed. Studies that identify the "low hanging fruit" on water efficiency and substitution of reused water for fresh water are required to ensure economic viability. The current proposal to transfer of mine water to Mt Piper Power Plant is one example of such "low hanging fruit" and a policy that requires water reuse before consideration of fresh water would improve water efficiency.

Although the Colong Foundation questions the report's finding that "an expanding mining sector is a driver for change". The regional plan needs to respond to the urgent problem of climate change (see page 7). Climate change means that the future economic benefits of coal mining to the region are greatly overstated (see page 23). Exaggeration is so rampant that the Department has had to commission its own economic advice when reviewing mining companies claims for the Springvale and Airly mine expansions. Unfortunately the industry-distorted economic analysis has been enshrined in Government policy. Yet even with the political power to change policy, the mining industry will be unable to overcome the politics of climate change. More, not less, constraints will be applied to coal mining into the future and regional planning for economic restructuring of the coal industry should be a priority. And a key element of restructuring must be for this regional plan to ensure the protection of other natural resources.

### **Importance of heritage conservation relative to coal mining will increase**

Areas of "potential high environmental value" (page 64) are mapped (Figure 17) but these do not include high conservation value lands in State Forests, particularly those in the Gardens of Stone Stage 2 reserve proposal (see the report, *Seeing the Gardens*, also attached for your information).

As the Department would be aware, in 2014 the Planning and Assessment Commission for the Coalpac open-cut mine proposal found that the highest and best use of Ben Bullen State Forest, was as a reserve under the National Parks and Wildlife Act, 1974. The draft regional plan does not show on Figure 17 the nationally listed upland swamps on sandstone on Newnes Plateau. The Gardens of Stone region also contains internationally significant pagoda landscapes, as well as many rare plants.

Lithgow will greatly benefit from heritage-focussed tourism, but is reluctant to embrace tourism. So many heritage shops in Lithgow would be suited to tourist-based businesses. The *Seeing the Gardens* report outlines the economic and social benefits of reserving the Gardens of Stone region. these benefits could be achieved without a sudden closure of the declining coal industry.

The potential of the Gardens of Stone Stage 2 reserve proposal for low-impact, nature-based recreation and tourism is great, but under-recognised and under-utilised at present. A network of visitor experiences within the Gardens of Stone reserve proposal would provide the basis of a whole new nature-based marketing initiative for the western Blue Mountains, promoting the Gardens of Stone as the very distinctive other side of the Blue Mountains. The regional economic benefit produced by 50 000 visitors to the Gardens of Stone region is estimated as a direct spend of around \$3M to \$4 million per year (see report, page 4 and 36-46 on regional economics by Gillespie Economics).

To meet Australia's international obligations on climate change, some resources will not to be burnt. In a climate changing world, coal must be retained to protect areas with natural wonders like pagodas, swamps and waterfalls in the Gardens of Stone region from mine subsidence.

To protect essential water resources and nationally significant heritage values the impacts of coal mining subsidence impacts must be reduced in the state forests around Lithgow. The current loss of water resources, water pollution and loss of nationally listed swamps, as well as the recent mine waste collapse at Clarence are all indicative of poor management of coal resources.

Identification of protection in this regional plan would also be a step towards recognition of longwall mining as a "key threatening process" to upland swamps and other heritage values, such as cliffs, pagodas and waterfalls. Such protection would be a small step towards recognition that, due to climate change, more coal must be retained underground.

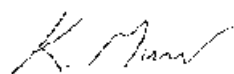
With the above political realities of climate change bearing down on the region, the reference to the impacts of coal mining on page 24 of the draft regional plan must be expanded from dust and noise to include the prevention of adverse impacts of mine subsidence on heritage values and water loss (see page 49).

The regional plan must focus on the securing environmental assets that allow a future transition to less dependence on mining, rather than condone the destruction of heritage values and offset of these values in ways that don't protect Gardens of Stone region. Last year the Advisory Committee for the Greater Blue Mountains World Heritage Area recognised that the Gardens of Stone region had world heritage value. It is well past time this area was protected.

The development of alternate energy sources is another dimension of the regional plan (page 59) but there is again no real coherent strategy, rather a restatement of current policy positions.

Thank you for the opportunity to comment on the draft regional plan.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K. Muir', with a stylized flourish at the end.

Keith Muir  
Director  
The Colong Foundation for Wilderness Ltd