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4 July 2016

Submission on Draft Central West & Orana Regional Plan

Dear Sir/Madam,

Central West Environment Council (CWEC) is an umbrella organisation representing conservation groups and individuals in central west NSW working to protect the local environment for future generations.

CWEC welcomes the opportunity to provide comments on the *Draft Central West & Orana Regional Plan* ('the Draft Plan'). We consider that strategic regional planning is very important and must be based on a clear understanding of the current condition of environmental values and the natural resource base.

Our communities and enterprises into the future, over a 20 year period, are dependent on a healthy natural resource base and resilient, self-sustaining ecosystem services.

CWEC considers that the Central West and Orana Regions have been significantly impacted by over 200 years of unfettered development and extensive broad scale clearing.

This has resulted in problems with dry land salinity, erosion, loss of fertile soils, poor water quality, invasive species and loss of biodiversity. The cost to the public purse to remediate this damage has been significant, as has the

ongoing loss of agricultural production. The increased urban sprawl on prime agricultural land has also been a preventable loss of irreplaceable resources.

The expectation that an over-cleared, degraded landscape with overallocated, unhealthy river systems will be capable of supporting continued exploitation and development pressures indefinitely will place an unreasonable economic and social burden on future generations.

CWEC considers that a functional strategic plan for the region should acknowledge the natural resource limitations and identify clear restrictions on unsustainable development into the future. A clever society should be able to work within these limitations so that future generations are not deprived of the enjoyment and amenity of a sustainable and functioning environmental support base.

CWEC has the following concerns in regard to the Draft Plan:

- 1. There is no reference to Ecologically Sustainable Development principles in the vision or goals.
- 2. There is inadequate data on baseline current condition of key environmental and natural resource values that provide critical ecosystem services.
- 3. Targets and goals developed in Catchment Action Plans with significant community engagement have not been integrated into the regional planning process.
- 4. The value of ecosystem services to the regional economy has not been considered.
- 5. There is no provision for permanent protection of areas of high environmental value, as identified in Fig 17¹, such as no-go zones or red flag areas. CWEC maintains that all vegetation remnants in the Central West and Orana Regions have important environmental values that must be protected because of extensive fragmentation across the landscape and loss of biodiversity corridors. The transfer of genetic material is critical for maintaining diversity in native flora and fauna.
- 6. Fig 17 does not show the nationally listed upland swamps on Newnes Plateau, the Gardens of Stone region, or the high conservation lands located in State Forests. The Gardens of Stone region contains internationally significant pagoda landscapes. This area has high environmental value that must be recognised.

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¹ Environment p 66/67

- 7. The reliance on biodiversity offsetting is inappropriate for the region where such a large percentage of biodiversity has already been destroyed. There are a high number of critically endangered ecological communities, fauna and flora species in the region. These cannot be offset and must be protected by no go zones in the Draft Plan.
- 8. CWEC is encouraged by the recognition of the critical environmental, cultural and social values of Travelling Stock Routes and Reserves. TSRs must be afforded protection to continue providing these highly significant landscape and heritage values into the future.
- 9. The issue of land-use conflict is not resolved. Agricultural land, rural communities, other industries, biodiversity and water sources are not protected from the significant impact of coal and gold mining or urban sprawl. Clear protection of significant environmental, social and economic values of sustainable industries must be identified.
- 10. There is a contradiction in that coal mining is considered to be an ongoing priority for the region while at the same time recognising the impacts of climate change and the need to build resilience to increased intensity in floods, droughts, storms and fires. There is no consideration of the downturn in coal prices and demand, along with the global agreements to control climate change. The impacts on the regional economy of more extreme weather conditions far outweighs any short term royalties, taxes and wages provided by the coal industry. Any profit (though most coal mines are now operating at a loss in NSW) goes offshore. Coal mining is not a sustainable industry.
- 11. Mitigation of climate change impacts should include mapping of flood prone land and high bushfire risk areas.
- 12. There needs to be a stronger strategy to support the rapid expansion of the renewable energy industry in the region. The Central West & Orana has ideal conditions for large-scale solar thermal development to provide base load power to NSW. The rapid global transition to renewable energy sources should not be ignored. Support for emerging technologies and industries includes appropriate education and training opportunities for new job creation.

Conclusion

The Draft Plan does not provide direction for a sustainable future in the Central West & Orana Region.

A clear understanding of the current impacts of development past and present is critical for the development of planning principles for the next 20 years.

Mitigation of the rapid onset of climate change impacts and the opportunities provided by the renewable energy industry must be central to a regional plan, as is permanent protection for high environmental values and ecosystem services.

CWEC recommends that better engagement with the broader community will improve the development and implementation of regional planning across NSW.

Yours sincerely

B. Smiles

Bev Smiles

Secretary