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4 July 2016

Mr Ashley Albury
Director Regions, Western
PO Box 58
DUBBO NSW 2830

Dear Mr Albury

RE: DRAFT CENTRAL WEST AND ORANA REGIONAL PLAN

Thank you for providing Mid-Western Regional Council (Council) with the opportunity to provide feedback in relation to the draft Central West and Orana Regional Plan.

Council congratulates the NSW Department of Planning and Environment (DP&E) on developing the first Regional Plan for the area which is considered a positive step forward in planning for the future of the region.

Council's feedback on the draft plan is provided below.

Goal 1 – A Growing and Diverse Regional Economy

Maintaining a strong and diverse local economy is a key priority for Council. The rapid expansion of coal mining activities in the last 5 years has delivered important economic benefits and employment opportunities. However, it has also been challenging for other traditional industries such as agriculture, viticulture, tourism and retail who are required to compete for scarce resources including as labour, land and water.

Council would like to specifically note the following items/issues in relation to this Goal:

- A significant amount of agricultural land has been acquired in the Mid-Western Region to allow for the expansion of mining activities. This has resulted in a general reduction in farming activities, where properties have been bought out due to the close proximity of the mine or for land offset purposes. It is critical that DP&E works with Council to develop plans which protect valuable agricultural land and ensure the ongoing economic viability of the sector in the future.

- Mining in the Mid-Western Region makes a significant contribution to the overall economic prosperity of the Central West and Orana Region. Some of the largest coal mining projects in NSW are located in the Mid-Western Region including Ulan Coal, Moolarben Coal and Wilpinjong Coal projects. With a combined mining workforce of 2,000 employees and annual production of more than 30 million tonnes of coal, the Region is exposed to volatility in this sector. It is critical that the full life cycle of mining (including mine closure) is considered in the assessment of any future developments of coal mining projects in the Region to ensure that its economic potential is sustainable.
- Whilst there are significant local mining resources in the Mid-Western Region, Council would appreciate any assistance from DP&E in planning for a post-mining based local economy. This should include assistance in encouraging new industries to the region to ensure ongoing employment opportunities in regional areas.
- Council continues to seek the support of DP&E in assessing and managing the cumulative impacts of mining in the Region. Given the size and scale of individual projects in the Region, the cumulative impacts can have a major impact on social and economic infrastructure, noise, water and air quality conditions.
- Supporting local tourism is integral to maintaining economic diversity in the Mid-Western Region. Ensuring that tourism development opportunities can be accommodated in relevant local plans and policies plays an important role in achieving this objective.

Goal 2 – A Region with Strong Freight Transport and Utility Infrastructure Networks that Support Economic Growth

The provision of essential infrastructure to support economic growth is also a key priority for Council. Connectivity to other regions across NSW and interstate requires a reliable and efficient transport and freight system. The ongoing availability and expansion of utilities is fundamental to the future prosperity of the Mid-Western Region.

Council would like to specifically note the following items/issues in relation to this Goal:

- It is noted that in Figure 9: Regional Transport, that inactive rail lines have not been included. Many of these lines, including the Kandos to Gulgong section, are non-operational but do have the potential to be re-opened if required for freight transport in the future. Closure and disposal of these lines requires an Act of Parliament under Section 99A of the Transport Administration Act 1988, which has not occurred to Council's knowledge. Council seeks clarity as to the NSW Government's future intentions with this rail line as it impacts the use of land adjoining the rail corridor.
- Regional aviation services play a critical role in connecting regional communities such as the Mid-Western Region to metropolitan areas, interstate and international destinations and achieving economic growth. Council appreciates the support of DP&E in ensuring that adequate slots are available at Sydney's Kingsford Smith Airport for services provided by regional carriers in the future.

- Figure 11 shows that the Mid-Western Region is being forecast as having a water supply deficiency of 51% to 98% by 2036. Council would like to see this issue addressed in more detail under Direction 3.3. A lack of water infrastructure is a major issue, not just to sustain current levels of economic activity in the Mid-Western Region but also to meet essential town water supply requirements. Council is well aware of the importance of protecting scarce water infrastructure and it is critical that this is carefully considered in the assessment of any proposed future mining projects in the Mid-Western Region such as the Lue Silver Mine and Bylong Coal Mine.

Goal 3 – A Region that Protects and Enhances its Productive Agricultural Land, Natural Resources and Environmental Assets

Council recognises the importance of protecting the natural resources and assets of the Mid-Western Region. It is critical that strategic planning provides an adequate balance between the current and future needs of the Region, and supports a mix of industries and land use activities.

Council would like to specifically note the following items/issues in relation to this Goal:

- As discussed under Goal 2 above, local water security is a critical issue and it is important that sufficient resources are devoted to protecting the available water supply for future generations.
- The development of alternative energy resources has been identified in the draft plan. Figure 4 should be updated to include the proposed wind farm projects that are currently identified on the DP&E website for the Mid-Western Region, being the 330 turbine Ungula Wind Farm Project which is located in the north-western part of the Mid-Western Region and the recently approved Crudine Ridge Wind Farm Project for 77 turbines, located between the villages of Hill End and Ilford.
- Action 3.6.2 discusses naturally occurring asbestos which does not include the Mid-Western Region. However, Council has numerous mapped areas with a low or medium likelihood of occurrence, including within the north-western part of Gulgong. These can be forwarded to DP&E upon request.
- The issue of biodiversity offsets conflicting with agricultural activities has been raised by the local farming community in the Mid-Western Region. The offset of vegetated areas located between established farms has led to unmaintained land providing an area for noxious weeds to become established and spread into nearby farmlands. Whilst the protection of biodiversity is of utmost importance, Council believes that this is an area that DP&E could provide a more substantial role in ensuring the right lands are protected without causing the added burden of weed management onto farmers.

Goal 4 – Strong Communities and Liveable Places that Cater for the Region's Changing Population

Council continues to promote the Mid-Western Region as a great place to live, work, invest and visit. The Region has continued to experience relatively strong population growth of around 1.0% per annum, which reflects its attractiveness and liveability. Planning for future populations and their changing needs is essential to delivering upon the Region's key competitive advantages and ensuring long term liveability.

Council would like to specifically note the following items/issues in relation to this Goal:

- Council would like to see the mapping and planning that has been prepared for Regional Cities to be expanded to include Regional Centres and their growth areas, similar to the mapping included in the draft North Coast Regional Strategy.
- The draft plan identifies CENTROC as a key stakeholder in the draft plan. It is important that other key stakeholders are also identified including OROC, Regional Development Australia Orana and Regional Development Australia Central West.

Council notes that the implementation of the regional plan will require a role for Council in achieving its stated objectives and actions. Whilst Council looks forward to working with DP&E on the various goals, it is important to note that the resources of many councils including Mid-Western are limited, particularly as they work towards the objective of financial sustainability under the local government reform process. DP&E should consider how it can provide additional resources to help councils at relevant stages during the implementation of the plan.

If you have any questions or wish to discuss the issues raised in this submission, please contact myself or Council's Director Development, Julie Robertson on (02) 6378 2850.

Yours sincerely

A handwritten signature in black ink, appearing to be 'BRAD CAM', followed by a period.

BRAD CAM
GENERAL MANAGER