Friends of the Pilliga PO Box 420 Coonabarabran 2357

Submission on Draft Central West and Orana Regional Plan

Thank you for the opportunity to comment on this plan.

Friends of the Pilliga is a small environment group based in Coonabarabran, within the Orana Region. We have been involved in conservation issues for over 15 years.

We find the draft plan to be beautifully presented but disappointing as a plan to replace existing strategies.

- It focuses on growth where it would be better to strive for genuine ecologically sustainable development. This should include a greater emphasis on the opportunities presented by our abundant renewable energy resources wind and sun. We need to transition to a stable economy not one of growth.
- The vision is limited to growth and development with "a healthy environment" appearing to be tacked on as an afterthought. There is no vision about how we want the region to look in the future. Do we want small towns to die? Do we want more big towns? Do we just want the region to be a massive hole in the ground? What ways can we find to create jobs? Where do we want future conservation areas?
- There has been much planning work done over recent times by councils and catchment management authorities and Office of Environment and Heritage. Anne Keirle has prepared an extensive report on the biodiversity of the Central West. This existing evidence has been ignored.
- It fails to protect Biodiversity, High Conservation Value Lands and Water by aiming just to "avoid" new development in high conservation value areas rather than to declare No-Go zones in these areas. These assets may have been mapped but they haven't been protected. There is no consideration of declining species, such as woodland birds which in the longer term may join the 119 threatened species already listed, and finally become extinct species.
- The plan takes a very rosy view of mining over conservation or farming. By definition mining only ever has a finite life. Look at Hill End and Broken Hill.
- Living in western NSW we know that public transport is poorer now than it was 40 years ago. Even getting to Sydney from Coonabarabran now requires either a long trip in a private vehicle to a railway station or an airport or an even longer trip by coach to Lithgow and transfer to Interurban trains. Without good public transport the ageing population with declining health must travel long distances to obtain specialist attention. The plan does not effectively address this issue.
- Councils appear to be the ones bearing the brunt of implementation without being supported in this especially with respect to monitoring.

Goal 1

- We strongly support the intended Inland Rail Corridor as an opportunity for jobs and as a genuine step towards ecologically sustainable development.
- This section appears to support agribusiness not small business and small manufacturing. It has been proven from studies that towns which have many

- small businesses are much more resilient in difficult times than those that depend on big industries.
- It also implies support for mining such as Coal Seam Gas extraction without considering social, environment, economic and cumulative impacts to local communities.
- We need good policies for health, education and tourism to be considered within this goal.
- This goal identifies barriers to agricultural operations. It also needs to consider constraints to good environment outcomes. These include the inability to deliver sufficient environmental water to the Cudgegong River because a high flow would flood certain river crossings.
- While aiming to protect settlements and agricultural lands, natural areas are seen to be fair game for development, aiming only to "manage and mitigate" impacts but never stop.

Goal 2

- As previously stated we support the Inland Rail Corridor.
- We also see the need for improved public transport services.

Goal 3

- We strongly support the protection of Travelling Stock Reserves.
- Throughout this section mining is always prioritized over agriculture, and agriculture over environmental assets. This goes as far as protecting mining lands from being set aside for conservation.
- The maps seem to indicate the Namoi Irrigation Area extends through the Pilliga and as far south as Binnaway. This is not irrigation country.
- At present companies seem to be able just to roll over their licences for gas
 exploration without going through full renewal processes. And without actually
 fulfilling the requirement to do something on the land. This should not be
 allowed.
- We also support the planned implementation of the NSW Renewable Action Plan.
- Direction 3.3. Mechanisms to resolve land use conflict issues are superficial. Current mechanisms fail landholders miserably, leaving them little choice between selling out to mining companies or staying on to suffer the impacts su as has happened to families living near the mines near Boggabri. Without No-Go areas there is no protection.
- Direction 3.4 aims not to reduce the quantity of water reaching reservoirs. It is already too late. Burrendong has lost 9% of average inflow in the last 10 years. The rivers should get priority over extractive industries because without a healthy river there is no future for the region. Rivers should not be seen as just delivery networks for irrigation water. There is in fact no mention of irrigation at all.
- Direction 3.5. We support provisions to protect water catchments and groundwater.
- Not all High Conservation Value areas have been identified eg State Forests and HCV on private land.
- There is over-reliance on avoiding, minimizing and offsetting as a mechanism for conservation. Protection of remnants is better than rehabilitation. It is far

cheaper and more efficient to preserve what is already there than to try to reconstruct an ecosystem where it has been destroyed. Inevitably mining companies end up palming off the costs of rehabilitation onto the state by just mothballing an old mine then selling it off at a huge discount to companies without the financial ability to rehabilitate as is happening in Queensland.

- The plan needs to include the word native in front of fish. We do not wish to conserve habitat or environmental management that benefits carp.
- Threats to waterways include overextraction of surface and groundwater for development or irrigation, drainage of existing wetlands.
- Direction 3.6. Consideration of climate change in this plan is a great start but will need the allocation of significant resources to be effective. The first step should be to stop any further development of fossil fuel industries and move quickly to renewables.

Goal 4

- Again we must ask the question "where do we want to be?". Until we know that we are just repeating what we have already done. For example growth of Bathurst and Orange is already constrained by the availability of water. Future subdivisions are problematic. Should too much water be extracted there will be further decline in the extent and viability of the Macquarie Marshes.
- Economic self-determination of Aboriginal communities must address the
 situation of Aboriginal people living within all communities. Instead of
 stop/start programs to suit the electoral cycle or political expediency long term
 well-resourced integrated programs should be allowed to work. The hollowing
 out of TAFE and the programs it offers has had a major impact on Indigenous
 training. And ongoing jobs are more important than "training" positions. We
 can't expect Aboriginal people to become small business people when most
 Australians are employees anyway.
- The only land title respected in Australia is freehold so more Aboriginal land should be held under freehold title.
- New housing should be energy efficient, environmentally sensitive with a mix of generations with greater diversity and not just more of the same.

Thank you once again for the opportunity to comment of the draft plan.

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