



Thank you for the opportunity to make a submission on the Draft Central West and Orana Regional Plan. Following are comments on selected aspects of the draft plan:

Governance

The Greens NSW do not support the governance proposals proposed for the Coordination and Monitoring Committee (p16). The proposal for the committee to be made up of 7 government agencies and an unspecified number of local representatives from Joint Organisations and Regional Organisations of Councils does not provide any confidence that there will be a reasonable balance of state and local interests.

The Greens call for clarity about how this committee would operate and also call for the committee to be structured so that local views and perspectives have the potential to influence decision making. Given that the Committee will coordinate and drive the delivery of actions (by an Implementation Plan), it is reasonable that the committee be weighted equally between state and local level representation.

There is also clearly a need for specific environmental representation to be included. We suggest the Nature Conservation Council as the most appropriate.

Coal mining

The draft plan indicates that the mineral and energy resource sector will remain a major contributor to the regional economy, particularly in the Central West, with additional mining operations being established.

Australia has international commitments to positively contribute to ensuring that the global warming is constrained to less than 1.5 degrees. To meet this commitment requires that there are no new coal mines. The government needs to clearly explain how its policy to encourage new mines in the region fits with Australia's international commitments. On the face of it this plan will significantly undermine Australia's ability to meet our obligations.

Moreover, coal is in structural decline, rather than the government planning to encourage new mines that have the real potential to become stranded assets in the foreseeable future, the focus should be on ensuring a smooth transition away from an economic reliance on coal mining. If 4,600 people were employed in 2015, rather than blindly hoping this employment will be maintained and increased in the long term, responsible planning would entail preparatory planning for the shrinkage rather than expansion of coalmining employment. The Renewable Energy Action Plan should be prioritised and specifically identified as a strategy to transition away from a dependence on fossil fuel extraction.

The draft plan includes a specific proposal to implement a robust assessment of the social, economic and environmental implications of existing mining activities (p24). That such an assessment is needed clearly indicates that successive governments have inadequately assessed and regulated mining operations to ensure they do not impact the surrounding environment, agriculture, health or community amenity. The proposals to significantly improve the assessment and control of mining – in particular the proposal to develop and introduce a cumulative impact assessment methodology – are supported.

The NSW Greens strongly object to the proposal on p.25 to develop scenario plans at a regional scale to convince the community of purported benefits that will accrue to communities affected by mining. Given that there are very significant negative climate change implications associated with coal mining but also a broad array of other environmental, health and amenity implications associated with all types of mining – it would be duplicitous to present a glossy economic case for mining over other more sustainable industries.

On p 49 it states that ‘Australian and State government policies relating to the mining and energy resource industries are continually evolving in response to governments’ improved understanding of national issues and opportunities’. The Greens strongly suggest that the policies included in the draft plan - which make it clear that the government intends to support new coal and coal seam gas extraction - should be revised to prioritise the need for climate change responsiveness.

Agribusiness

Agriculture is an important and long term industry in the regions. However agribusiness must remain answerable to planning controls. The plan states that the government supports ongoing strategic planning to identify barriers to agricultural operations, ancillary processing industries, and storage facilities. On p 21 it indicates that councils will need to identify local planning impediments to potential diversification, such as land use permissibility, zoning and other local provisions.

The NSW Greens take the view that it is most important to ensure that a clear focus is maintained on ensuring that agribusiness respects environmental sensitivities and is sustainable in the long term. It would be against the long term interests of the region to see environmental value being given secondary importance to short-term economic returns.

Water security

On page 42 it notes that much of the region will face water supply deficiencies by 2036. While securing the future of water supply in towns is vital, it is equally important to take into account the need for environmental flows to be maintained in order to ensure a viable natural environment. Plans for population growth and industrial development cannot progress in the long run at the expense of environmental flows .

Protection of water supplies and quality must be the first priority in assessing any new development. On p62 it is noted that subdivision for rural residential land has dramatically increased the number of land holders who are able to extract water, without the need for a water licence. The Greens strongly support the sustainable management of the region’s water – specifically by a review of the water licensing regulations so that subdivisions do not automatically result in a proliferation of uncontrolled rights to extract water from waterways.

Protecting agriculture, natural resources and environmental assets

On p45 the draft plan indicates an intention to actively plan to protect productive agricultural lands to manage the risks of declining productivity from land fragmentation, climate change, biosecurity risks and land use conflicts. The draft identifies that land use conflicts need to be avoided in order to prioritise agriculture. It is significant that mining and coal seam gas extraction are identified as potentially creating land use conflicts. The Greens take the view that the mismatch between agriculture and mining/coal seam gas is more than a temporary inconvenience. In fact coal mining and coal seam gas extraction have been demonstrated to destroy agriculture particularly but not only by impacting on ground water tables. That the government does not even acknowledge this threat makes clear that it unreasonably prioritises the mining industry over agriculture. The draft plan should be amended to expressly prioritise agriculture before mining in the region.

Biodiversity protection

It is not clear if the draft plan is setting up a separate regime to the existing and or proposed biodiversity legislation. The Greens oppose any alternative regime under the planning controls that would allow for the approval of development with significant negative environmental impacts.

At this point in the review of the biodiversity protection legislation, it only remains to be said that the Greens object to any watering down of the current protections of biodiversity.

Climate change adaptation

It makes absolute sense to build resilience to the impacts of natural hazards and climate change as is proposed on pp70-71. However it would make more sense to complement these policies with others which prioritise the reduction of greenhouse gas emissions. A key emissions reduction policy should be to limit coal mining and coal seam gas extraction.

Should you wish to discuss any of these matters further, please don't hesitate to contact my office on (02) 9230 3030 or david.shoebridge@parliament.nsw.gov.au

Regards,

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