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10 March 2017

Ms K O'Flaherty Director Regions, Western Department of Planning and Environment PO Box 58 DUBBO NSW 2830

Dear Ms O'Flaherty

DRAFT FAR WEST REGIONAL PLAN - DUBBO REGIONAL COUNCIL SUBMISSION

I refer to the draft Far West Regional Plan (FWRP) prepared by the Department of Planning and Environment (DPE) which was placed on public exhibition from 13 December 2016 until 13 March 2017.

Council welcomes the opportunity to provide our perspectives in respect of the draft Far West Regional Plan. As the largest regional city in western New South Wales, Dubbo plays a major role in the communities of the Far West region, particularly the eastern Local Government Areas (LGAs) of Bourke, Brewarrina, Cobar and Walgett. Council has a strong cross-regional relationship with both the Far West and Orana regions through its role as the largest member of the Orana Regional Organisation of Councils (OROC) which covers some 194,000 square kilometres, or 20% of the State of NSW. As a result of these relationships, Dubbo is positioned as a higher-order service centre for education, health, commerce and transport, not only to the members of OROC, but the wider Far West Region.

1. Role of the draft Far West Regional Plan

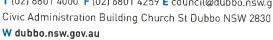
While it is understood that the FWRP is intended to be a land use planning document, Council is concerned that the overall structure and content of the draft Plan is generally recognisable as a regional economic development strategy. This is apparent from the outset of the draft Plan, with the focus being clearly on economic development outcomes, with the overarching vision, 'A diverse regional economy, supported by the right infrastructure, an exceptional natural environment and resilient communities'. This statement in itself indicates that the Plan's sole purpose is to achieve a diversified regional economy with no direct mention of sustainable planning.

It is considered that this has resulted in the creation of a document which is comprised primarily of economic development actions rather than robust planning principles which will achieve sustainable long term development across the Region. Whilst it is acknowledged that economic development and land use planning are closely related, the lack of robust planning principles throughout the Plan have led to the creation of a document that only confuses the community's view of the planning system and will likely be difficult for practitioners to implement. Unfortunately, as a result, it is considered that the draft Plan will be unlikely to have any substantial role in guiding sustainable development of the Far West region over the next 20 years.













It is also disappointing that the DPE, as a regional planning authority, has not taken the opportunity of the regional planning process to create a functional and progressive land use plan for the Far West Region that is both meaningful and practical for communities and planning professionals alike. It is considered this is also a result of the overall lack of definition around the regional planning process in NSW and the lack of understanding by the State Government to comprehend the diverse range of issues facing individual communities within the regions. Nevertheless, the integrity, relevance and usability of the Plan by the communities of the Far West Region is questionable at best.

2. Relationship with the Far West Initiative

A review of the FWRP highlights that delivery of the vision and guiding principles of the Plan is proposed to be through one of two ways; as a separate process running alongside the Far West Initiative, or through the establishment of a new Coordination and Monitoring Committee.

It is clear from the draft Plan that the DPE is in favour of the Plan being delivered alongside the Far West Initiative and that this is preferential to the establishment of a Coordination and Monitoring Committee. However, given the Government does not appear to have made any progress as to the overall governance structure of the Far West Initiative, there is an overwhelming sense of uncertainty within the communities of the Far West surrounding this significant issue. As a result, the release of the FWRP for community consultation is considered highly premature given the overall level of uncertainty within both local government and the community. It is Council's view that the communities of the Far West Region are unable to fully comprehend the purpose and role of the FWRP when there is no settled governance structure or implementation mechanism for the draft Plan.

3. Delivery of the Plan

The FWRP includes a number of actions which are designed to achieve the overall vision and goals within the draft Plan. A review of the proposed actions within the draft Plan has shown that they are broad and very general in nature. The actions included in the draft Plan should be specific and achievable within the 20 year timeframe of the Plan and arranged into short, medium and long term priorities. In addition, the actions should also provide an indication as to who will be responsible for their delivery. It is considered that this vital omission from the Plan only further emphasises the premature release of the FWRP for public consultation.

It is considered that many of the proposed actions in the Plan appear to be tasks which would be assumed to be the responsibility of local councils. However, the Plan has not recognised the significant lack of resources and capacity for Far West councils to undertake such actions. This further increases the uncertainty as to whether the actions are realistic and achievable.

4. Vision

Council's concerns with the overarching vision of the Plan have been previously discussed in this submission. The concerns are primarily centred around the Plan presenting as an economic development strategy in place of a land use strategy.

A specific comment within the vision section of the Plan is regarding the map on pages 10-11. In this map, the use of blue arrows are quite difficult to read. For example, the arrow labelled 'Access to Dubbo' incorrectly points to a port symbol where there is clearly no such facility in the City. In addition, there is also a level of confusion as to whether this port symbol may be associated with the arrow from Walgett to Dubbo. In addition, the yellow dotted line which indicates 'Proposed Water Infrastructure Security Project' requires further explanation and meaning to be provided in the Plan.

5. Regional Airport Connections

It is considered the section within the draft Plan under 'Direction 7: Improve regional airport connections' is extremely brief and does not attempt to provide the required level of detailed information regarding the strategic importance of airport connections for the region. Due to the distances separating the communities of the Far West Region, air transport is of vital importance to encourage strong connections within the region and beyond to other major centres, including Dubbo. For instance, the recent growth in regular passenger transport (RPT) services from Dubbo to Brisbane, Canberra, Melbourne and Newcastle has seen passenger numbers increase by approximately 7%.

Given Dubbo is the largest regional city in western NSW and a major service centre for the communities of the Far West Region, these additional connections from Dubbo should be highlighted in the Plan. In addition, it is considered that the Dubbo City Regional Airport also has a major role and importance for the Far West region which appears to be understated in the Plan. Continued growth in Regular Passenger Transport (RPT) services from Dubbo provides transport, economic and tourism benefits not only for Dubbo, but across the Far West Region.

Figure 5, 'Inter-regional transport connections' on pages 30-31 of the Plan is also considered somewhat vague and ambiguous. It is recommended that a number of amendments be made to the map prior to finalisation of the Plan in order to provide new flight services and connections throughout the region, particularly from Dubbo. In addition, the blue arrows which are representative of 'Key Strategic Regional Corridors' have no definition around them or justification as to why these routes have been identified for inclusion in the draft Plan as key strategic regional corridors. It is considered that the map should also include additional labels for other cities and/or towns, particularly at railway junctions and intersections, in order to provide more clarity and understanding to the map.

6. Mining and Temporary Worker Accommodation

Mining in the Far West Region is the largest contributor to the gross regional product (GRP) of the region, contributing \$783 million annually to the Far West Regional economy. However, the development of mining accommodation for temporary and itinerant workers can have significant impacts on local communities and economies. It is considered that the Plan has not adequately addressed the issue of temporary worker accommodation or provided any actions for mitigating any potential impacts of mining and temporary worker accommodation, for example, within 'Direction 22: Improve the availability of affordable housing and worker accommodation options'. It is considered that the Plan should provide further information addressing the importance of locating seasonal, itinerant and mining worker accommodation within existing centres and avoiding the location of worker accommodation in undeveloped areas.

The economic impacts of a 'fly-in-fly-out' workforce are well known and by encouraging worker accommodation in existing centres, existing services will be utilised, local communities will be strengthened and potential adverse impacts of a 'fly-in-fly-out' workforce may be mitigated.

7. Local Government Narratives

It is noted that the local government narratives for the Region's east and Region's west on pages 63 and 65 respectively only identify Dubbo's connecting flights to Sydney. With the recent introduction of additional flight services from Dubbo to Brisbane, Melbourne, Canberra and Newcastle, these should be added to this section of the Plan as they represent significant improvements to connectivity for the communities of the Far West region.

In addition, the draft Plan has not included any information in respect of the proposed inland rail network between Melbourne and Brisbane. Although the inland rail system is not proposed to be constructed within the Far West Region, it will provide improved transport connections across western NSW with benefits extending to the Far West Region. In particular, the eastern LGAs of the Far West Region, such as Walgett, will see significant benefits due to their reasonable proximity to the proposed route.

Council appreciates the opportunity to provide these comments and issues in respect of the draft Far West Regional Plan. Council looks forward to working closely with the Department to ensure the Central West and Orana Regional Plan can integrate effectively and guide the sustainable development of better regions, given the synergies and relationships between the Regions.

If you require any further information or clarification regarding this submission, please do not hesitate to contact Council's Manager City Strategy Services, Steven Jennings, during normal office hours on (02) 6801 4000.

Yours faithfully

Melissa Watkins

Director Environmental Services