



Our Reference: 405770
Your Reference: 405770
Contact Name: Cara Stoltenberg
Telephone: (02) 6799 6855

15 February 2018

Director Resources Policy
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam,

Re: Submission on Proposed amendments to the Voluntary Land Acquisition and Mitigation Policy (VLAMP) and Mining State Environmental Planning Policy (SEPP)

Thank you for the opportunity to review the "Proposed amendments to the Voluntary Land Acquisition and Mitigation Policy (VLAMP) and Mining State Environmental Planning Policy (SEPP)", both prepared by the New South Wales (NSW) Government and dated November 2017.

Narrabri Shire Council (NSC) have reviewed the draft documents, and provides the following comments:

1. NSC agrees with the intent to ensure the thresholds for the grant of voluntary acquisition and mitigation rights are consistent with the Environmental Protection Authority's (EPA) policies. The EPA has revised its policies for noise and air quality impacts, and it follows then that the associated legislation and policy is also updated to reflect such changes.
2. However, with regards to the proposed amendments to the VLAMP, further examination of the draft documents reveals that there is little content that will improve the process or provide greater clarity. Overall, the draft guidelines appear to have missed an opportunity to provide meaningful guidance and advice to facilitate the relationship between councils, the community, mining companies and the Department. Further, NSC feels that it would have been more beneficial to involve the public in the initial review of the VLAMP, rather than the internal review that took place.
3. Council would like to request that the VLAMP and SEPP be amended to achieve the following outcomes:
 - i. landholders are provided with a level playing field and fully consulted in any property acquisition and land access discussions and that as far as is reasonably practicable the operation of rural properties is not detrimentally effected by operation of any mine.
 - ii. Noise and vibration mitigation measures form part of the conditions of all consents for mining operations. If any proposed impacts do not comply with any of the assessment criteria, that consents are structured to ensure that all negotiated agreements are binding, and that all voluntary mitigation and/or acquisition rights are upheld.

NSC appreciates the opportunity to review the VLAMP and SEPP and trusts that these comments will be considered in the current edition and revision of all of the associated documents.

I trust this information is to your satisfaction. If you require any further clarification please do not hesitate to contact Mrs Cara Stoltenberg, Town Planner, of Council's Development and Economic Growth Department on (02) 67996855 or caras@narrabri.nsw.gov.au.

Yours faithfully,



Mr Daniel Boyce
MANAGER PLANNING AND REGULATORY SERVICES