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To Department of Planning and Environment, Western Region

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Central West and Orana Regional Plan 2041

Thank you for the opportunity for the Central West Environment Council (CWEC) to comment on this plan. It is a significant document that will help guide the future of the Central West/Orange for the next 20 years. CWEC is an umbrella group providing support to the district environment groups for nearly 30 years in the Central West of New South Wales with the aim of protecting the environment in the region for future generations.

Out comments are arranged sequentially, following the main objectives.

Biodiversity

Objective 1 Identify, protect and connect important environmental assets

Strategy 1.1

These strategies are supported, except for the fact that the Central West has so little land left in its natural or near-natural condition, that all remnant vegetation and wetlands should be classified as 'high value environmental land'. Biodiversity is in severe decline in the region, and this has not been acknowledged in this plan. For example, of 597 vertebrate species known from two of the major catchments in this region (Central West and Lachlan), 382 are declining. That's 64%! (Kerle and Goldney, 2019).

As an example of how governments at all levels have failed to protect threatened species. The Koala population is still in steep decline, its habitat is still being cleared and it is now as from today listed as 'endangered' in New South Wales (SMH, 11/2/2022), despite various actions plans to conserve it. The strategies and actions in this plan are not going to reverse that situation, nor the plight of many other threatened species and ecological communities. They are simply not strong enough.

Action 1 We support a better coordinated approach in respect of data collection. It is recommended that NSW use the national data base such as the Atlas of Living Australia and require developers to consult that, rather than relying on NSW Bionet. For example, data collected via the Platypus Monitoring Network go to the national, not state database and much bird data also goes to national systems.

Strategy 1.2

This strategy is going to conflict with the objective 13 to protect agricultural production values.

Strategy 1.3

A biodiversity corridor concept is strongly supported. The plan should, however, recognise that much of the potential for a corridor already exists in the Travelling Stock Routes and Reserves in the region. The plan should be more pro-active in identifying this network as the basis for the corridors. This network is also extremely significant to the Indigenous people of this region as they provide links to ancient pathways (Spooner et al., 2019).

Places and communities

Objective 3 Plan for resilient places and communities

Strategy 3.3

The plan should be more explicit in its support for the principles of the circular economy. Furthermore, it should recognise that the circular economy on its own is insufficient to protect environmental assets (Objective 1) or achievement of Net Zero emissions by 2050. Transitioning to renewable energy is a start, but still requires considerable growth in resource extraction. What is needed is clear transition to a steady state economy with no increase in consumption (particularly resource extraction) or population. The well-being of the community can still be the top priority for the region, but heading in a different direction, with more emphasis on quality of life, rather than quantity of possessions (Haydn, 2017).

Strategy 3.4

This strategy is supported, but it should be taken further. There should be a limit on the ecological footprint of new developments. Housing can be designed not only to be more efficient, but to be smaller, with better use of community garden areas and even shared walls to conserve energy. Current new housing is going in the other direction, with large house footprints, no shared walls, very little open space and no requirement for solar or rain tanks. There is also little to no consideration of where the water for new housing is to come from.

Water management

Objective 4: Secure and resilient regional water resources

The draft plan recognises that water sources in the region are capped against growth in extraction and are fully allocated systems. The Macquarie and Lachlan rivers are over-allocated and need water returned for river health under the Murray-Darling Basin Plan

All planning for improved water security in the region cannot include larger dams and weirs that will capture more natural flows from the rivers. The proposed raising of Wyangala Dam wall on the Lachlan River and the proposed reregulating weir at Gin Gin on the Macquarie River are counter to NSW Govt commitments under the Murray-Darling Basin Plan

Groundwater sources in the Lachlan and Macquarie valleys are under stress. Increased dependence on groundwater during drought could cause aquifer collapse. The capture of recharge flows through proposed larger dams and weirs will place more pressure on groundwater availability.

Inland rivers and groundwater sources cannot support growth in water dependent industries while also supporting growing populations under climate change scenarios

Improved water security in the region must be achieved through non-infrastructure projects like changes to water sharing rules, improved water recycling, increased efficiency in water use, demand management. Australians have a large per capita water use compared to other countries.

We give in principle support for Strategy 4.1 to put water availability up front in land use planning and development decisions.

Protecting the Macquarie Marshes and Lachlan Catchment Wetlands. The draft plan fails to adequately recognise the national and international significance of the wetlands in the Macquarie and Lachlan catchments and NSW Government obligations under the Ramsar Treaty. Loss of natural flows to these wetlands through new or enlarged dams and weirs will increase the degradation of their extent and condition.

Strategy 4.2 The plan must include the protection of flows to wetlands through improved water sharing plan rules and a commitment to no new or enlarged instream water storages.

Regional growth in centres

Objective 6 A network of healthy and prosperous centres

Why is it assumed that there will be growth in this region? And more, importantly, why is it assumed that this is necessarily a good thing? The regional cities of Dubbo, Orange and Bathurst are already at a good size. There is already a low unemployment rate, so is it necessary to create new job opportunities. Some centres are struggling to provide for new developments. Orange is already suffering water shortages, evidenced by its increasingly desperate attempts to extract more water from surrounding creeks, which are already under stress from over-extraction.

This whole plan is based on the assumption that population growth, with its attendant growth in transport, housing, infrastructure and concomitant loss of biodiversity is 'good'. This is not only a fallacy, but begs the question of 'when does the Central West have enough population?'. If that question cannot be raised in the regional plan, then where can it be raised?

Rural residential

Objective 9: Manage rural residential development

This statement needs further thought: *A subregional approach to planning for rural lifestyle development could balance the ability to provide options for rural residential development without impacting the availability of unconstrained vacant urban land.*

The only way that would be possible would be to develop land already highly disturbed.

Strategy 9.1 contains some conflicting proposals e.g. avoiding areas of high environmental ...significance v avoiding primary production zones. If you take away all the areas that you are going to avoid, there's not much left. What the plan needs to be is more specific in which constraints take priority.

Agricultural production

Objective 13: Protect agricultural production values and promote agriculture innovation, sustainability and value-add opportunities

CWEC has some concerns over the wording in Strategy 13.3 'consider the quality of land for agriculture and scarcity of productive agricultural land in the region'. On what is this based? Almost the whole region is under agricultural production, admittedly of varying quality, but hardly 'scarce'. The implication is that more land needs to be put under agriculture and the only way this can happen is for more clearing to be undertaken, which will compromise Objectives 1 and 4.

It should also be remembered that the reason why many species are listed as 'vulnerable' or 'endangered' is because their habitat coincides with fertile land (Koala being a case in point, as well as some grassland and box woodland ecosystems). This is one of the reasons why TSRs (along with cemeteries and some road verges) are so valuable as they are some of the very few places remaining that contain habitat for species needing fertile valley bottoms and plains, almost all of which are now lost to agricultural activity.

Mining

Objective 17: Sustainably maximise the productivity of resource lands

This objective relates to growth in mining activities in the region which causes land-use conflict with Objective 1: protecting biodiversity, Objective 4: managing water sources, Objective 5: respect the region's landscapes, character and cultural heritage and Objective 13: protecting prime agricultural land.

Recognition of the need to support a just transition away from coal in the Lithgow and Mudgee areas is supported. The closure of Mt Piper power station should be included in the plan.

Rare earth mines and gas extraction might bring prosperity to the region, but can have serious environmental consequences, not just for wildlife, but also for water resources and agricultural productivity.

It is good that the plan recognises the need for the transition away from coal. It can't come soon enough in relation to climate change. However, it also needs to acknowledge that to avoid an increase in temperature over 1.5 emissions need to be net zero by 2030, not 2050 (a/c Climate Council) and this region is one of those like to be most badly affected.

Locations

Objective 19; Strengthen Bathurst, Dubbo and Orange as innovative and progressive regional cities

The objective is fine, as are many of the strategies eg collaboration, but why then insist on 'growth' in these cities. Sustainable growth is for the most part an oxymoron. The problem of Orange's water supply has already been pointed out. One can have innovation and progression in cities that are transitioning to stable economies that won't eat up more productive and/or environmentally sensitive lands and water resources.

Renewable Energy

Objective 20 Leverage the Central–West Orana Renewable Energy Zone to provide economic benefit to communities

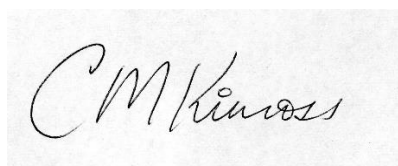
CWEC provides in principle support for this objective. Investment in renewable energy across the region would benefit, however, if the area of the Central West Renewable Energy Zone was extended to other areas in the region where renewable projects are in the planning phase eg Bathurst and Orange. Care is needed, furthermore, to ensure that infrastructure required by this initiative is not going to destroy environmentally-sensitive lands.

Conclusion

This new plan is a great improvement on previous plans. It has some excellent initiatives and proposals that could enhance the environment of the Central West region if implemented carefully.

It reads well and on first reading, it seems as if the future for this region can achieve healthy and prosperous communities as well as the conservation of important environmental assets.

Unfortunately, it's rarely that simple. Continuing down our existing path of increased population and prosperity will exacerbate the existing decline of the health of our ecosystems and biodiversity. Minor amendments here and there to 'encourage' more sustainable activities are not going to reverse that decline. In other words, the plan suffers from the problem of conflicting objectives. If you want to conserve environmental assets (Objective 1), then you will need to be much more explicit about that in Objectives 2-21 as many of the strategies outlined in the plan will do little or nothing to achieve Objective 1.

A handwritten signature in black ink on a light-colored background. The signature is written in a cursive style and reads "Cilla Kinross".

Cilla Kinross, President

Central West Environment Council

18/2/2022

References

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- Spooner, P.G., Firman, M. & Yalmambirra (2019) Travelling Stock Routes and Reserves (TSRs) and links to previous Indigenous pathways. In Kinross, C., Goldney, D., Kerle, A. & B. Mactaggart (eds.) *Biodiversity Dreaming: Sustaining Nature and Agriculture after 200 years of European inland settlement in the Central West Region of New South Wales*. Greening Bathurst.
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