

Starting with an accurate, complete and balanced plan that is at least accurate at time of adoption

Although our knowledge of the value of the land and its potential is constantly being informed, it is important that the plan at least be accurate at the time it is adopted.

I can't speak for the knowledge of other parts of the region, but I can speak with authority on the Calga area and the fact that the information in this Draft Plan is out of date and misleading.

The reference to Gosford City Council's 2008 Biodiversity Management Policy, for example, ignores the 2012 gazetting of the endangered hanging swamps and other water dependent ecosystems in Calga. If they were important enough to gazette in 2012, they are important enough to include in our Regional Plan.

The only figure references illustrating competing land use in the Calga area figures 8 and 9 showing a questionably based mining assets map and a very out of date natural assets map. These need to be updated based on current knowledge (including gazetted and legal precedent information).

Dangerously omitted is a cultural values map. An important example of this is acknowledgement of the Calga Cultural Landscape. This is "the most significant Aboriginal women's place in NSW" according to the **unanimous** evidence from **all parties'** experts, and agreed by the Commissioners and written up in their decision, in LEC cases "Walkabout Park vs The Planning Minister" and "Darkinjung vs The Planning Minister" (both decisions handed down 17th December 2015).

Sustainability

The term "sustainable" should never been used when referring to destructive non-renewable industry like sand extraction.

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This should include specific reference to Tourism, especially in view of the NSW emphasis on growing regional tourism and the emphasis on tourism in subsequent sections of this Draft Plan, and reference to preserving cultural heritage, considering the rich concentration and network of cultural sites in the area.

Goal 2 grow and diversify the regional economy

Tourism, particularly nature tourism.

Lists 5 largest employers as education & training, retail trade, manufacturing, construction, and accommodation & food services. The 5th category (it may even be the 4th ahead of construction, you'll need to check the data) is tourism. Accommodation and food services are, at least in part, a subset of tourism, but it is Tourism that is significant for this region. I am sure that Destination NSW can assist with this data.

Transport links

The region needs public transport linking the coast to the Hinterland (west of the M1 along the M33 Tourist Route which starts at Calga in the south). This is extremely important if we are to support NSW's planned growth in tourism and tourism employment in the region.

Goal 3 sustain productive landscapes

This incorrectly only refers extraction and farming.

This should refer to the balance between the **three** high value competing land uses permissible under the zoning shown in Figure 8. being agriculture, extraction **and tourism**. To ignore nature- or eco-tourism as a 'productive landscape use' is a gross omission. We already have major legislation and planning instruments in the SREP8 acknowledging this. The regional plan should too.

Figure 8: central coast mining

This map makes no reference to the fact that the same areas crosshatched for extraction are also prime eco-tourism and agricultural land with existing land uses and is also the site of endangered water dependent ecosystems and significant cultural heritage which the NSW government has undertaken to protect.

Identifying mining as an asset is not in itself a problem. What is a problem is there being insufficient weight given to the competing land uses in these areas.

Considering the NSW Government's claim to want to support agriculture, grow eco-tourism, protect endangered ecosystems and preserve our heritage, these values should be presented with equal emphasis to mining in this Plan (and they are not!)

We note the disclaimer, that there is no inferred right to mine, but the fact is that this map has been and continues to be used as justification for approving extraction and supporting the assumption that extraction value outweighs other industry.

It may be that the history of this cross hatched map is not known to the existing Planning Department personnel. It should be put on current record that this map did not come about from a proper geological or other scientific survey into valuable sand resources. This map is the unaltered, never updated, 1950's-60's map put together by a clerk in the Planning Department to show where the Central Coast Hinterland sandstone was found. A number of decades later it was adopted, unquestioningly, as a mining map with the assumption that all the sandstone identified in the map is a valuable mining resource.

This is an incredibly lazy and dangerous way to produce a planning instrument. To perpetuate the myth today that it is a scientifically produced plan is either disingenuous or ignorant or both.

The inclusion of this map in its current form is extremely concerning. It is perpetuating the highly risky conclusion that the entire Somersby plateau, made of sandstone and perched on a sandstone aquifer, is a sand resource to be exploited subject primarily to the landowner's will to extract it.

This "Clayton's Case" approach to planning inevitably must lead to a chaotic landscape of incompatible land uses and the inevitable failure of agriculture and tourism, with mining being the "last man standing".

The extraction of sandstone could (theoretically) exist alongside agriculture and eco-tourism. HOWEVER, there is no acknowledgement that history has shown that agriculture, eco-tourism and endangered water dependent ecosystems cannot coexist alongside significant sandstone extraction.

Goal 4 protect and manage the natural and cultural environment

This is great, but because the natural and mining assets have a map which is a very visual and impactful statement, this needs to be balanced. There needs to be a stronger (including graphic at least at a high level if there are valid reasons to not include the detail) reference to cultural assets. This includes Australia's Aboriginal **and** settler assets.

Although we understand the need to be careful with publicising the existence and location of sensitive assets that might then be subject to malicious destruction or desecration, these maps can be presented at sufficiently high a level omitting specific detail, so that they won't betray the locations of specific sacred places.

Most notable and relevant is the cultural landscape of Calga that was the subject of a Land & Environment Court decision to preserve on 17th December 2015. It should be noted that NSW OEH is currently assessing it for listing as an Aboriginal Place. The fact that it still sits, unacknowledged, under the cross hatching for mining in Calga in figure 8 is alarming.

Figure 9 environmental assets

This map is out of date. It does not include the areas in Calga declared as endangered water dependent ecosystems in 2012. It is dangerous to include a figure of environmental assets that does not show the highest valued most at risk environmental assets. A cynic might say that this was because they exist in the same area cross hatched for extractive industry (see figure 8) but I am sure this is not the Planning Department's intention and that this is an innocent oversight.

We, and I am sure Gosford City Council, would be happy to assist with the identification of where these endangered swamps are located.

Identify and protect heritage values

Inclusion of the statement that "The NSW Government will support the preparation of appropriate heritage studies... etc." is trite and ignores the fact that appropriate heritage studies are already in existence and should be referenced in this document (see Walkabout Park vs The Planning Minister" and "Darkinjung vs The Planning Minister" referred to above).

Direction 4.3 Protect the coast and manage natural hazards and climate change risks

This suggests that only the coast should be protected from climate change risks. It implies, through omission, that the Central Coast's vast Hinterland is not at risk from climate change.

There should be an acknowledgement that all development should include an assessment of the development's contribution to the cumulative impact of natural and manmade factors that cause and exacerbate extreme weather events and, especially in this region, bush fire.