

CENTRAL COAST GREENS

Social Equality & Economic Justice | Ecological Sustainability | Grassroots Democracy | Peace, Nonviolence & Disarmament

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Draft Central Coast Regional Plan 2015

Thank you for the opportunity to comment on this draft plan.

The Central Coast Greens stated in our submission to the “Your Future, Central Coast 2031” discussion paper in 2014 that the following principles should be fundamental in planning for any region, including our own, and made some remarks based on the discussion paper using these criteria. These criteria remain critical to the way we approach planning in our region in the future:

- Anthropogenic climate change is real and we must act to mitigate, as well as adapt to, its effects
- Ecologically sustainable development is essential for all planning decisions
- Reducing inequality – of opportunity, education, housing and employment – will lead to a more harmonious community that benefits all
- Our most scarce and valuable resource is water – its continued protection and ownership by the public must remain a fundamental principle of planning
- We must plan for the future, not the past – and this includes have a simple, clear vision using future-proof technology

The 2015 Draft Plan sets out four goals in its vision, which we believe remain fundamentally flawed in that they continue to compartmentalize the way we live and interact with our environment. These goals,

- *“ enhance community lifestyles and accelerate housing supply;*
- *grow and diversify the regional economy;*
- *sustain productive landscapes; and*
- *protect and manage the natural and cultural environment. ”*

while admirable in themselves, continue to treat the environment as something that is separate from our community, lifestyles, housing choices, economy and productive landscapes. Nothing could be more inaccurate and we urge the government to develop a single unified vision statement that demonstrates an understanding that, as we said in 2014, *“Our environment is the planet, and includes the houses we live in, and the streets we walk on, the water we drink and the air we breath. By compartmentalizing “the environment” into the bush and the beach, just as the economy is considered something apart and separate from*

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daily life, we will continue to make the same mistakes as have been made for the last 250 years.”

We are disappointed that this fundamental conceptual change has not been made by the drafters of the regional plan.

In 2014 we asked for a clear statement of the methodology and assumptions that lie behind the modelling summarized in the plan. As a single example, all the population figures in this 2015 draft appear to be based on *NSW Department of Planning and Environment (2015), unpublished, ‘Central Coast Region Population Projections 2011-36’, Sydney*. This document is not available on the DoPE website for its methodology and assumptions to be tested. On that note, the endnotes refer only to existing government, council or RDA reports, with the exception of three think tank reports (Industry NSW, Ipsos and the Grattan Institute) and website data from two property development companies, Lend Lease and Westfield. There are no commissioned independent research papers on any aspect of the plan. We find this is an unacceptable lack for an important planning paper for a region with a population greater than the Northern Territory.

We pointed out in our 2014 submission that the community had little faith that submissions made to the government would be taken seriously in the development of plans. This draft does nothing to improve that situation – the forward notes that

“85 written and 15 online submissions, 485 completed surveys and more than 630 online and social media comments. Over 400 participants also attended stakeholder discussions.”

Nowhere in this report can we find summaries of those submissions and discussions, nor pointers to where the plan has been modified in response to any of them. The simplest Council DA application contains that information, outlining objections and giving clear responses. The very least we should expect from a document which sets out the framework of the next decades on the Coast is an acknowledgment that the government listened to the community.

In 2014 we pointed out that we had plenty of plans available to us on the Central Coast, but what we lacked were specific actions. This draft continues the tradition of recycling data and trumpeting existing programs as if they were innovations. One example is sufficient. Section 1.2.1 *“Prepare local plans for vibrant, liveable local centres”* is three paragraphs and a dot point of platitudes. Apart from the fact that state governments should not be involved in local plan development, local plans already exist. LEPs were recently updated across the state, held up locally due to the refusal of the state government to allow Gosford a special E zone for its COSS lands (a program of reserves which is praised in this draft plan!). It is very worrying to us to read

“Local plans will give residents greater certainty about the scale and mix of activities likely to be supported in future planning decisions ”

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because the use of the word “will” implies that either the state government does not recognize existing local planning instruments, or intends, as it has in the past, to completely overhaul the planning system and potentially remove control from local residents.

Recent changes to environmental protection in Wyong council have concerned the Central Coast Greens and many residents. We are therefore alarmed to read in section 1.4 that

“ The draft Plan proposes specific actions to improve the infrastructure contributions framework, the coordination of infrastructure and land release staging, and the approach to offsetting the biodiversity impacts of new development ”

but provides no detail on what those specific actions might be. Biodiversity offset management in NSW is in an appalling state. There is no central register of land which has been set aside by various planning authorities as biodiversity offsets. Recent decisions in relation to coal mines in the Hunter, where land set aside as a biodiversity offset in perpetuity less than a decade earlier, was permitted to be mined, has demonstrated that the system does not work.

(<http://www.nature.org.au/news/2015/11/warkworth-decision-demonstrates-biodiversity-offsets-policy-is-a-farce/>)

Further,

“ Monitoring the outcomes will allow stakeholders to identify if the actions have been successful or require adjustment ”

is meaningless unless stakeholders are identified, and include community representatives, and there is some detail on what monitoring will be done and what powers stakeholders will have to halt a process if it is judged unsuccessful.

Although there are many fine sentiments and sketch plans in this document – we commend the commitment to cycling infrastructure, in-fill housing, extending reserves and fostering new jobs – we find that the lack of detail concerning. There remains no indication of a genuine commitment to community engagement and ecologically sustainable development.

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Detailed comments on specific topics:

Transport.

Goal 1 / Direction 1.3 - "Create connected and accessible communities and centres" in the context of the Central Coast Regional Transport Plan, together with: Goal 2 / Direction 2.2 - "Maintain strong inter-regional connections for business";

Introduction:

The Central Coast Greens acknowledge the voluminous amount of planning that has been carried out for this region by local government and state agencies.

This part of our submission addresses certain number of issues that arise from the transport infrastructure planning components in this draft regional plan with particular reference to the Central Coast Regional Transport Plan (2013).

We would like to comment:

- considering that the region is classified as being in a "high population growth" category, the provision for new major long-term transport infrastructure appears to be absent,
- planning details for specific projects, if mentioned in either the draft Regional Plan or the Regional Transport Plan (CCRTP) appear to rely on the maintaining or limited upgrading of existing infrastructure,
- the scope and range of projects appear to be modest and confined to specific locations and items,
- it would now seem timely to review and update the specific projects list some three years after the release of the CCRTP,
- we could not find any reference to new measures to address the backlog of local transport infrastructure maintenance and upgrade projects in the domain of local government (Gosford City Council and Wyong Shire Council). This backlog of deferred and pending projects needs to be taken into consideration in any integrated planning process. The two councils are not in a position to bring their projects list up to date under the current funding regime(s). Their impending voluntary merger will not materially improve their financial position and ability to meet the expected increase in demand for transport infrastructure expenditure concurrent with the region's growth. (see also e.g.: Wyong Shire Key Infrastructure Study 2012 and Gosford Council Transport Asset Management Plan 2011)

A strategic revision of transport planning in the Regional Plan for the Central Coast needs to include:

- addressing the high road transport / car dependency in the region,
- planning for and setting aside of future dedicated intra-regional and inter-regional transport corridors,
- commitment to a regional long-term public transport strategy that includes new-builds and support for existing and emerging public transport providers,
- targeted development of alternative transport options, including for cycling, walking and tele-commuting,
- commitment to fund accessible transport upgrades and -solutions

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- a detailed study of local freight usage, needs and opportunities.

The benefits of adopting such a revised and strategic Regional Plan will include:

- a reduction in road congestion and associated economic and social benefits,
- a reduction in the local road toll,
- a reduction in road usage-related maintenance costs,
- a deferment in necessary new-build, upgrade and maintenance expenditure for road infrastructure,
- improvements in local air and noise environment quality,
- a reduction in carbon emissions,
- a reduction in fossil-fuel dependency and the associated economic benefits,
- improvement in cost-planning and associated cost savings in land acquisitions by committing early,
- improved certainty for and sustainability of local public transport,
- new economic and employment opportunities due to infrastructure investment,
- greater diversity of transport options providing choice and functionality
- improved health outcomes for local residents and workers,
- improved conditions and opportunities for local business and industry,
- an overall improvement in the amenity and attraction of the region for new private, business and institutional investment.

The Central Coast Greens suggest as specific options for consideration as inclusions in the Regional Plan and / or the revised and updated Regional Transport Plan:

- in view to the decreasing public transport patronage on the Central Coast line (compare gate numbers for Woy, Gosford, Tuggerah and Wyong with those for Strathfield, Hornsby, Hurstville, Blacktown and Bondi Junction): TfNSW to develop a more attractive fare structure to encourage train usage by the many commuters to Sydney metro and Newcastle,
- in view of the anticipated decrease in coal freight on the Northern freight corridor (Hunter to Port Kembla): improve a.m. and p.m. peak train frequency and service travel times both North- and South-bound,
- consider improved day-time and weekend local train services between Wyong (& Warnervale) and Woy Woy for off-peak periods,
- in view of the planned industrial and commercial development at the Warnervale growth precinct: a major upgrade of Warnervale station with a new transport interchange,
- better commuter offering at Wyong station by construction of a multi-storey fee-free commuter car park at Wyong station (Howarth St.)
- upgrade of Gosford transport interchange on the Western side (Showground Rd.)
- enlarge the commuter drop-off zones (kiss & ride) on the Western side of Tuggerah Station (Pacific Hwy) and Wyong station (Pacific Hwy)
- increase the number of bus shelters to 95% of all stops within four years

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- establishment of a commuter wharf at Gosford (near stadium) and upgrade of the existing small commuter wharf at Woy Woy,
- commitment to the Palm Beach - Ettalong ferry and the Woy Woy - Empire Bay ferry services, including roll-out of the Opal system
- commitment to the construction / linking up of regional bike paths that are separate from the road network - e.g. not shared with road users, including lighting (solar)
- commitment for more utility bike networks
- free secure bike storage at train stations, matching the free car parks available for motor vehicles
- establishment of a regional bike share / bike hire scheme
- preparation for the increasing uptake in electric vehicles by the creation of a regional network of charging stations (public and private)
- dedication of selected car spaces for car share schemes (e.g. Go-Get) and accompanied impact assessment on the local taxi service network,
- commitment to the existing community transport schemes and -operators to ensure their long term viability
- exploration of a hybrid reimbursement model for private bus operators, to encourage express bus services in peak hours and between residential and employment hubs (\$ per pax) while retaining services to outlying suburbs (\$ per km)
- trials of using alternative vehicles for public transport, such as club minibuses as very local shuttles, and 'service'/'collective' taxis on fixed routes
- a dedicated freight usage study for the Central Coast, including current usage, usage trends and opportunities
- provision for an intermodal freight terminal for the Central Coast to support regional industry and employment
- commitment to the envisaged NSW inland rail corridor route as a long-term alternative to the current time-share with the TfNSW passenger operations on the state-owned network.
- improved public transport and road linkages to the Mangrove Mountain, Kulnura & Yarramalong districts via Alison / Warnervale and Somersby
- commitment to the Woy Woy / Gosford - to - Swansea / Newcastle coastal transport corridor as a second primary regional link
- provision for a future high-speed rail stop / interchange for the Central Coast

Climate Change

The draft report has little reference to effective mitigation strategies in relation to climate change (3.1.2 speaks of “*responding to climate variability*” but not reducing it), and insufficient detail on adaptation plans.

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There is no specific discussion on the vexed and contentious issue of managed retreat beyond vague statements in section 4 about “*supporting regional decision-makers to identify and implement climate change adaptation projects and programs.*”. This gives no clear direction to the council, nor current landowners, about the government’s approach to private and public assets threatened by rising sea levels.

Statements such as “*Climate change is predicted to result in the increased frequency and severity of some hazards such as bushfire, coastal inundation and storm events. The draft Plan aims to improve the region’s resilience to hazards. The NSW Government will continue to support councils and local communities to identify, monitor, educate and plan for natural hazards*” provide only platitudes. How does the government intend to improve our resilience to hazards? Reference in the same section to “*economic coal reserves*” indicates that there is no serious intention of mitigating climate change impacts by making a decision to leave fossil fuel in the ground. Additionally, it brings into question the basis of any economic modelling lying behind this plan, that the drafters consider any thermal coal reserves to be “economic”.

Extractive Industries

We are very disappointed with statements such as “*work with councils so that man-made hazards such as mining-related surface subsidence, land contamination and road and rail noise are considered in future planning and development controls*”. We would prefer to see a commitment that there will be no new mines, no new land contamination and prevention of road and rail noise is planned for, rather than these hazards and negative impacts are merely considered.

In 2014 we called for an end to extractive industries on the coast - sandquarrying, coal, CSG and, eventually, bottled water - as we consider agriculture and tourism more valuable and more genuinely sustainable industries which must be protected and nurtured. The continued references in the draft plan to extractive industries and economic coal reserves cannot be supported. When PEL2 still existed, 98.6% of Mountain residents stated they wanted the area to be Gas Field Free. Sand quarries have, in recent years, been more and more often rejected as uneconomic or risking unacceptable impacts on the aquifer, local health, biosystems and Aboriginal cultural sites. The Central Coast should no longer be Sydney's quarry. We are now its food bowl.

Given the footprint of habitation on the coast, in a strip along the rail line which will only become more densely occupied, it is to be regretted that there is no commitment to act on the issue of freight rail noise, which currently reaches unacceptably high decibel levels at night for homes close to the line.

Water

4.2.1 is particularly alarming: “*work with councils to identify the need for further water sharing plans, based on the growth of the resources sector*” .

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There are water sharing plans which cover most of the agricultural areas, but again, there is growing community awareness of the value of our water resources, and a disinclination to allow the continuation of resource extraction. In recent years sand quarries have been more and more frequently refused by council and the Land and Environment court, in particular due to unacceptable impacts on the aquifer, and in any case, do not contribute much to our local economy in comparison to farmland they would displace. The local mountain community made it very clear that coal seam gas exploration will not be permitted, with 98.6% of the residents stating they wanted the Mountain to be Gas Field Free. The Planning and Assessment Committee rejected the economic modelling of the Wallarah2 coal mine, and given the terminal decline of the industry, it is likely that the mine will never open. There is no need for more water sharing plans, but a pressing need for better community control over existing plans. The farming community remains concerned about apparent plans to remove caps on the Kulnura/Mangrove Mountain Groundwater Source by the NOW. Limits to water extraction must remain and no changes to water sharing plans should be brought in that make it easier to privatize our groundwater supplies. Water is a common good and should not become a commodity for investment.

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