



Community Environment Network Inc.

An alliance of community and environment groups from Lake Macquarie, Wyong and Gosford.

24 March, 2016

General Manager
Hunter and Central Coast
PO Box 1226
Newcastle NSW 2300

CEN Submission on Draft Central Coast Regional Plan

Dear Sir/Madam,

The Community Environment Network (CEN) is an alliance of community and environment groups from Gosford, Wyong and Lake Macquarie. CEN is a not-for-profit, community based organization with a membership of 400 including approximately 80 groups. Our aim is to work for ecologically sustainable development and against threats to it.

We welcome the opportunity to comment on the *Draft Central Coast Regional Plan* (the "draft Plan") and have consulted with our members regarding key aspects of the draft Plan.

CEN notes that this is an important strategy that will shape the future of the Central Coast over the next 20 years and will set the context for future growth, development, jobs and environmental protection. We believe that this provides a unique opportunity to set a vision and direction that can protect and enhance the environmental values of the region whilst at the same time creating jobs, allowing growth and encouraging innovation.

We recognize the improvements that have been made since the Discussion Paper was exhibited in 2014 by including "protecting the natural environment" as part of the vision and goals. However, we are disappointed that this is not followed up and implemented with strong actions.

Although we are encouraged by reference to ecologically sustainable development (ESD) in the Introduction to the draft Plan, we believe that ESD should be included in the Vision and Goals for the Central Coast Regional Plan.

The Draft Plan fails to resolve land use conflict or deliver robust protection for environmentally sensitive areas. The draft Plan also fails to adequately address key environmental challenges such as biodiversity loss, clearing of native vegetation and habitat, habitat connectivity, access to green space and infrastructure, population planning, air and water pollution, resource and waste management efficiency and impacts of climate change.

We believe that the Draft Plan is an opportunity to set high standards of efficiency in future development in terms of water, waste, energy use and biodiversity conservation. We are concerned that the draft Plan talks about infrastructure planning (including transport) however appears to permit development to proceed without those plans in place. In areas such as the Somersby to Erina corridor, which includes the Gosford City Centre and a constrained topography, this is destined to increase planning problems rather than solve them.

Although we recognise that Wyong LGA provides some opportunities for "greenfield" development, we do not support the key strategy within the plan to use biodiversity offsetting to facilitate that development.

CEN notes the current approach by both Gosford and Wyong Councils which appears to promulgate the view that Councils are able to operate outside any planning rules, regulation or enforcement. This can be demonstrated by planning outcomes in Gosford such as allowing excessive building heights (over 200% in excess of current standards), the selling off of public land and the erosion of the 2010 Masterplan commitments.

Unfortunately, the draft Plan does little to ensure good governance, transparency and accountability in the future planning for the Central Coast region. In contrast, the draft Plan repeatedly encourages further amendments to planning instruments to accommodate development and business priorities without providing strong mechanisms to protect environmental and community values in the region.

Please find attached further comments in CEN's Submission on the draft Central Coast Regional Plan.

We strongly support improved strategic planning in NSW and hope to continue to work with Government to ensure that the planning system delivers improved outcomes for the environment and communities, now and for future generations.

Yours sincerely,



Jane Smith

CEO

Community Environment Network

CEN SUBMISSION ON DRAFT CENTRAL COAST REGIONAL PLAN

General Comments:

1. Lack of strategic planning framework

CEN shares the concerns of the Nature Conservation Council of NSW (NCC) that the current process of developing Regional Plans is outside of a clear legislative framework requiring mandated environmental assessment and public participation.

As a result, the consideration of a range of factors, particularly with reference to biodiversity and climate change, appears to be haphazard. There is no evidence within the draft Plan that cumulative impacts have been assessed or considered in future planning.

The report *The Way Ahead for Planning in NSW - Recommendations of the NSW Planning System Review*, Volume 1 – Major Issues, (Moore and Dyer, May 2012) identified a number of key elements for effective strategic planning, including:

- baseline studies of environmental and natural resource values to underpin strategic and land use planning,
- strategic environment assessment that includes mandatory consideration of prescribed environmental criteria, and assessment of cumulative impacts
- sharing of data across sectors,
- consistency with other government strategies, including , for example, in the areas of natural resource management, transport, infrastructure and health,
- identification of competing land uses and values and mechanisms for achieving environmental outcomes,
- early, sustained and genuine community engagement in strategic and land use planning processes,
- appropriate statutory weight for, and hierarchy, between planning instruments

Much of this appears to be absent from this process.

We strongly recommend that the Government establishes mandatory requirements for strategic planning including proper environmental assessment, genuine community engagement and appropriate mechanisms for achieving environmental, social and economic outcomes.

2. Failure to effectively integrate environmental outcomes in land use planning

The draft Plan fails to adequately identify environmental targets or clear environmental outcomes that are to be achieved within the region. Examples of targets that could be incorporated into regional plans include Catchment Action Plans targets or Natural Resources Commission targets.

Environmental outcomes need to be articulated in the draft Plan in order to ensure that Goal 4 is achieved.

3. Failure to provide adequate protection for areas of high environmental value

We have significant concerns that the NSW planning system is failing to protect areas of high conservation value. Although the draft Plan acknowledges the significant natural values of the Central Coast (e.g. Draft Central Coast Plan, Figure 9, Environmental Assets, p 52), we remain concerned that there are no actions that identify clear mechanisms for the protection of these areas (eg. no-go zones, prohibitions). Identification of an area as high conservation does not provide any additional protection and leaves a lot of discretion to the development assessment process, where experience shows that these values are often disregarded or undermined.

The Plan must clearly specify how the identified areas of high environmental value will be protected and enhanced.

4. Failure to resolve land use conflicts

We note that the draft Plan identifies a range of land use values including areas of high environmental value (Figure 9: p 52), Biophysical Strategic Agricultural Land (Figure 7: p42) and identified and potential mineral resources (Figure 8: p 45). However the draft Plan fails to resolve conflicts between these various uses and defers important strategic planning and impact management to a later stage.

The draft Plan also leaves the door open for mining in the Central Coast drinking water catchment. After promises from successive governments, it is now time to rule out mining on the Central Coast - and this should be clearly articulated in the Plan.

5. Heavy reliance on biodiversity offsetting

The draft Plan places too high an emphasis on biodiversity offsetting as a tool to facilitate development. Biodiversity offsetting should be the tool of last resort and should not be seen as a mechanism for justifying high impact development that will destroy areas of high environmental value (e.g. endangered ecological communities, threatened species habitat, wildlife corridors).

If biodiversity offsetting is to occur, it must meet best practice principles that require 'like for like' offsets, no net loss of biodiversity and offsets must be secured on the Central Coast.

In addition, the draft Plan should clearly identify areas that are off limits to offsetting (e.g. endangered ecological communities or threatened species habitat).

6. Action plan v final strategic planning document

The Regional Plans identify 'Actions' to be carried out, including substantial further work to inform strategic planning outcomes (e.g. establish further strategies, undertake further mapping, develop new methodologies etc.), rather than outcomes to be achieved and mechanisms for achieving those outcomes. That is, the draft Plan reads more like a work plan for undertaking further strategic planning work rather than a final strategic planning document that will deliver agreed environmental, social and economic outcomes.

7. Vision and Goals

Although we acknowledge that ecologically sustainable development (ESD) is referenced in the Introduction to the plan (p5) we believe that this needs to be included in the Vision and the Goals.

Recommendation:

The vision should be amended to include the term "ecologically sustainable" as follows:

*The vision for the Central Coast region is to protect the natural environment and to capitalise on its productive lands and resources, highly accessible business locations, and attractive coastal lifestyle to achieve **ecologically** sustainable economic growth and liveable communities.*

The goals should be amended to:

- enhance *community lifestyles and accelerate housing supply*;
- *grow and diversify the regional economy **in keeping with the principles of ecologically sustainable development***;
- *sustain productive landscapes; and*
- *protect and manage the natural and cultural environment.*

8. Evidence Underpinning the draft Plan

CEN is concerned that the draft Plan does not adequately reflect or take into account the environmental studies and strategies that have been developed to guide natural resource management in the region.

These include, but are not limited to:

- Coastal Open Space System (COSS) Strategy, Gosford City Council (2010)
- Draft Wyong Conservation Strategy (2003)
- Draft Central Coast Regional Conservation Plan – developed by OEH and was due for imminent release in 2011
- Hunter Central Rivers Catchment Management Authority - Catchment Action Plan (2013)
- Hawkesbury Nepean Catchment Management Authority – Catchment Action Plan (2013)
- Lower Hunter and Central Coast Regional Biodiversity and Conservation Strategy (2003)
- Vegetation mapping for Gosford and Wyong LGAs
- Numerous Council studies and management plans related to estuary and coastal management

9. Coastal Open Space System (COSS)

The Coastal Open Space System (COSS) is unique to the Central Coast, with Gosford council the only council in NSW to actively acquire and manage bushland as a system of networks to encourage the enhancement and protection of our natural open spaces. The COSS was created in 1984 and council continues to actively purchase identified high nature conservation value land as it becomes available. As at October 2014, 63% of the land (by area) identified for COSS had been acquired by Council.

The COSS is a valuable initiative and should be supported through the regional planning process. For example:

- The Regional Plan should articulate a commitment to fully implement the COSS Strategy including mechanisms to ensure the long-term voluntary acquisition of the remaining 37% of land (by area) currently identified for COSS.
- The COSS should be used as a model for the entire Central Coast region. The Regional Plan should outline actions to undertake investigations, develop a strategy and maps to carry the COSS forward in Wyong LGA.
- The NSW Government has previously made a commitment to introduce an E5 zone to be applied to COSS lands in public ownership. This must be fully implemented in the Regional Plan with an E5 zone gazetted at the same time that the Regional Plan is finalised.

10. Protection of Water Resources

The Central Coast Regional Plan needs to ensure the protection of water, including both surface and groundwater ecosystems. The requirement that any development should have neutral or beneficial effect on the region's water quality must be established in law (c.f. State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011).

In order to adequately protect the Central Coast's water resources, all coal seam gas and long wall coal mining activities should be banned in the Central Coast drinking water catchments. Specifically, coal seam gas mining in the vicinity of Peats Ridge should not proceed as it has the potential to affect the aquifer.

The Regional Plan should require the implementation of an Operating Licence for the Water Authority(s) for the Central Coast - this does not currently exist. The Operating Licence would ensure transparency and accountability within the water supply operations and protect consumers by prescribing minimum standards of service.

Similar to Sydney Water and Hunter Water, the licence would include requirements for:

- water quality
- asset performance, including system performance standards
- water conservation
- environmental indicators and management
- community consultation
- performance monitoring and auditing

Each year, an independent audit should be undertaken to assess compliance with the Operating Licence.

11. Climate Change

The draft Plan fails to adequately plan for climate change adaptation and mitigation. The only clear action in the plan is for the State Government to continue to support councils to consider the long

term implications of climate change in decision-making. There should be more emphasis in the document on climate change risks as a constraint on development.

The State Government has a responsibility to the community to map areas that will be impacted adversely by climate change and protect appropriate development controls for those areas. This is particularly important for floodplains, low lying coastal areas and high bushfire risk areas.

The plan does not include sufficient information regarding either the impacts or the adaptation needed to cope with the impacts of climate change. Such impacts include:

- Sea Level Rise – around 1m by 2100 and 4m or more by 2200.
- Increased Temperatures – could influence the need for hospitals and buffer zones for bushfire protection.
- Decreased use of fossil fuels – by 2050 we essentially need to be a low carbon economy with zero use of coal, oil and gas.
- Increased incidence of floods – more intense rainfall will inundate housing in low-lying areas.
- Increased incidence of drought – source of water will be an issue of increasingly critical importance. As will production of food which relies on availability of water.

Sea level rise will seriously impact low lying land in the coming decades. In particular, land around the waterfront of Gosford and the foreshores of Tuggerah Lake will be at risk of inundation and erosion. As the sea level rises further towards the next century, whole suburbs will be at risk. Any new areas being developed at this time should take this future into account.

Flooding also should be taken into account by siting new housing areas above potential flood zones. Areas around Wyong and Warnervale that are flood prone should be excised out of the potential development zones. Fragmentation of higher ground areas by inundation/flooding of lower areas between is highly likely.

The development zones around both Gosford and Wyong clearly include areas where impacts are going to be high. Many existing housing areas will need to be moved as hazards increase. It is madness to throw large amounts of capital into these areas when such investments will be lost in the future.

Development should be directed towards zones where sea level rise and flooding are not a risk. The map on p. 52 must be modified to include areas at risk of potential flooding from catchment rainfall and inundation due to sea level rise. Alternatively, include an additional map showing these and other hazards that will constrain development with some information on how mitigation measures that might be used.

12. Food and Water Resources

The plan does not include sufficient protection for our food and water producing areas. These are to become increasingly more important as temperatures rise. For example, the mountain plateau area is a vital source of water resources. 50% of the Central Coast water supply comes from ground water in the plateau area seeping into our creek system. These areas are not protected from inappropriate land use such as sand mining.

Agricultural and horticultural production is also very important on the plateau. This area is not included on the p. 42 map as valuable agricultural land. The value of this area for food production is very high with a micro-climate that is very supportive of horticulture and a ready irrigation source in the mountain's ground water reserves. It is a well known that the area has very good groundwater, clean to drink, plentiful in supply (even in drought) and easily used for irrigation on the sandy soils. Natural springs and bores up to 120m deep provide a very useful water supply for farmers.

The Wyong River is an important water source for farming and for drinking water. No account has been taken of the need to protect this resource in allowing mining industry under the Wyong valley.

13. Fossil Fuel Mining

Given the need to reduce our emissions radically by 2050, the inclusion of coal mining and coal seam gas in the plan appears to be extremely short sighted. To stay below the 2 degree guard rail for global warming, opening of any new fossil fuel extraction (coal, oil or gas) must be strongly discouraged or even banned. Existing mines must be run down so that they cease production sometime in the next 20 years.

Without these measures (undertaken here and elsewhere round the globe) warming is likely to continue well past 2 degrees (we are already at 1 degree and likely to reach 1.5 degrees within the next 15-20 years). The consequences of a rise of 3 or 4 degrees are drastic (e.g. mass extinction; sea level rise of many metres). The Paris meeting decided that 2 degrees should not be breached for very good reasons.

Marking potential coal mining areas on the p. 45 map is a clear signal that mining (including new mining) is expected to occur on the Central Coast and is simply an encouragement to multinational companies to seek to establish operations on the Central Coast. It would be a mistake to spend money on trying to develop these industries further when the Paris agreement clearly indicates that allowing such mining would be a mistake that would have to be reversed in the future at great cost to the community. It would be better simply to avoid beginning such business.

14. Extractive Areas on the Mountain Plateau

The map on p. 45 continues the mistake of placing the entire mountain plateau into extractive industries.

The mountain plateau area produces millions of dollars of produce per year including beef, chickens, eggs, fruit, vegetables, flowers, etc. as well as being a horse breeding area. Tourism is also a high value business on the plateau with arts and crafts, farm stay, eco-tourism and businesses such as astronomy and paint-ball.

Digging large holes in the mountain plateau destroys the country, drains the ground water and removes any future productivity of the land. This change is permanent, the water will never be returned, the land is gone. There is no track record of mines being rehabilitated sufficiently to return the land to its former productivity.

In contrast, agriculture provides the basic need of the community for food, continues indefinitely into the future and provides an intimate link between humanity and nature (e.g. tourism)

15. Waste Management

Businesses produce huge quantities of waste and landfill. The Central Coast does not have a Regional Waste strategy and management has become chaotic and unfair to residents in areas such as Kincumber, Springfield and Mangrove Mountain. In addition, dry building waste is increasing and is not being well managed mostly going to landfill and potentially impacting on water supply catchments.

CEN requests that a Central Coast Waste Strategy be developed as part of the draft Plan.

16. Infrastructure Planning

The draft Plan fails to adequately outline infrastructure improvements that will accompany growth within the region, particularly in the Gosford town centre. There are significant transport challenges in terms of the transport corridors and facilities to support the Precincts in Gosford and the proposed Somersby to Erina Corridor and these should be resolved before the draft Plan is finalised.

17. Proposal for Warnervale Regional Airport

We are pleased to see that the proposal for a Regional Airport, has been removed from the draft Central Coast Regional Plan. We understand that Wyong Council is continuing to lobby for such a proposal to be implemented.

We support the position of our members on the Central Coast who strongly oppose any move to develop a Regional Airport on the Central Coast on the basis that:

- An airport would negatively impact on community and social amenity and make surrounding housing undesirable to live in. Proposed flight paths are over or adjacent to Wyee, Mountain Road Warnervale, Alison, Watanobbi, North Wyong, Wyong, Bruce Crescent, Warnervale and the new Town Centre.
- The airport site is surrounded by environmentally sensitive land. The proposed 1,800m runway and safety runoff penetrates 900m into the SEPP 14 and E2 zoned Porters Creek Wetland. Porters Creek Wetland is the largest remaining freshwater wetland on the Central Coast and forms part of the drinking water catchment for the region.

18. Implementation of the Draft Plan

The delivery of the final Plan will be by the Coordinating and Monitoring Committee (CMC), made of Government and local council representatives (1 from each council). The proposed committee is heavily weighted with NSW Government representatives, and local government representation will be further reduced if Gosford and Wyong Councils amalgamate.

Their deliberations and decisions of the CMC are not open to public scrutiny and there appear to be no requirement or procedure for external input.

In order to provide improved links with agricultural and natural resource management objectives, representatives from the relevant Local Land Services should also be included on the Coordinating and Monitoring Committee.

A mechanism to ensure community input into the implementation of the plan needs to be clearly articulated. For example, Illawarra Environment and Resources Groups have been identified as relevant supporting groups under the Illawarra-Shoalhaven Regional Plan.

19. Ability for Local Councils to effectively deliver the Plan

The draft Plan relies on ongoing implementation by Gosford and Wyong Councils, working with the NSW Government. Environment and community groups in the region are concerned with the poor track record of both Gosford and Wyong councils in failing to adequately protect areas of high conservation value, habitat corridors and sensitive coastal environments.

Appropriate oversight is needed to ensure that the relevant local councils protect the important environment and coastal values of the Central Coast in accordance with the Plan.

We also note that the draft Central Coast Regional Plan was prepared without regard to the proposed amalgamation of Gosford and Wyong Councils. If the amalgamation goes ahead, this could impact on the short term capacity of the newly amalgamated LGA to deliver on the draft Plan.

Specific Comments on the Actions within the Draft Central Coast Regional Plan

Item / Actions	Draft Central Coast Regional Plan	CEN Comments
Vision:	The vision for the Central Coast region is to protect the natural environment and to capitalise on its productive lands and resources, highly accessible business locations, and attractive coastal lifestyle to achieve sustainable economic growth and liveable communities.	<p>Although we acknowledge that ecologically sustainable development (ESD) is referenced in the Introduction to the plan (p5) we believe that this needs to be included in the Vision and the Goals.</p> <p>Recommendation: The vision should be amended to include the term "ecologically sustainable" as follows:</p> <p><i>The vision for the Central Coast region is to protect the natural environment and to capitalise on its productive lands and resources, highly accessible business locations, and attractive coastal lifestyle to achieve ecologically sustainable economic growth and liveable communities.</i></p>
Goals:	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Ecologically sustainable development should be added as an additional goal in the draft Plan
	<ul style="list-style-type: none"> • enhance community lifestyles and accelerate housing supply; 	<ul style="list-style-type: none"> • The Plan does not address community infrastructure that is already years behind due to poor local government management and poor governance. • Terminologies such as In Fill Gaps suggests spot rezonings (Planning Proposals) that often lead to inappropriate or incompatible land uses (eg. development in flood prone areas or mine subsidence regions). • Much of the proposed new housing falls under the North Wyong Structure Plan and identifies areas in the north of the Wyong Shire. Most of these areas are currently natural bushland with very little infrastructure or transport to support future development. <p>CEN is concerned that the Plan views environmental considerations as "barriers" to development and uses biodiversity offsetting as a mechanism to bypass environmental protection.</p>
	<ul style="list-style-type: none"> • grow and diversify the regional economy; 	<p>If ESD is not included as a goal in its own right then this goal should be amended as follows:</p> <ul style="list-style-type: none"> • <i>grow and diversify the regional economy in keeping with the</i>

		<i>principles of ecologically sustainable development;</i>
	<ul style="list-style-type: none"> sustain productive landscapes; and 	CEN supports this goal as it relates to sustainable agriculture however does not support actions within the plan to continue or enhance extractive industries such as coal and gas mining.
	<ul style="list-style-type: none"> protect and manage the natural and cultural environment. 	CEN supports this goal however we are concerned that the draft Plan does not follow through with strong actions to implement this goal.
GOAL 1 – Enhance community lifestyles and accelerate housing supply		
DIRECTION 1.1 Create great places to live		
ACTION 1.1.1 Protect scenic amenity and character	<p>The NSW Government will:</p> <ul style="list-style-type: none"> support local initiatives to protect the scenic values, amenity and character of local areas. 	<p>Although we support the intended action, it is vague and lacks any specific mechanisms for implementation.</p> <p>History demonstrates that there is a lack of consistency, transparency and accountability in planning with spot rezonings continuing to be facilitated at the local government and state government levels.</p> <p>This is demonstrated by high-rise proposals within both Gosford and Wyong LGAs that grossly exceed current height and FSR standards in current planning instruments, thereby altering the character of local areas without any regard to extensive community consultation processes.</p> <p>In addition, the failure of the State government to implement the promised E5 zone has undermined community trust in commitments to implement a strategic planning approach and protect the scenic qualities of the region.</p> <p>CEN calls on the State government to</p> <ul style="list-style-type: none"> introduce mechanisms within the Gosford LEP to complete the implementation of the COSS system in Gosford LGA Implement previous State government commitments to introduce an E5 Zone to protect COSS lands undertake investigations, develop a strategy and maps to carry the COSS forward in Wyong LEP.

ACTION 1.1.2: Plan for integrated and well-connected open space, sporting and recreation opportunities	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • support councils to develop open space and recreation strategies which: <ul style="list-style-type: none"> ○ identify a range of accessible open space and recreation opportunities; ○ integrate open space and recreation networks; and ○ improve public foreshore access. 	<p>CEN supports the intention of this action however, we note that Gosford and Wyong Councils have excluded local communities from meaningful consultation on the use of public lands. This has been demonstrated by recent actions to reclassify community land to operational land.</p> <p><u>Recommendations:</u></p> <ul style="list-style-type: none"> • The draft Plan needs to require, and set standards, for meaningful community engagement and consultation processes. • Spot rezonings and development on flood prone land should not be allowed. • Wyong Council has a policy of no corridors on public or private lands – the Regional Plan needs to override that approach. • Gosford COSS lands should be recognized in plan and protected with E5 zone.
ACTION 1.1.3 Investigate opportunities to grow and better connect walking and cycling transport networks	<p>The NSW Government will work with councils to:</p> <ul style="list-style-type: none"> • prioritise links to create a connected network that: <ul style="list-style-type: none"> ○ maximises use of the bushland and foreshores available; and ○ provides opportunities for residents to access jobs and services. 	<p>Agreed - ensuring that in doing so wetlands, foreshores and High Conservation Lands are protected.</p>
ACTION 1.1.4: Prepare guidelines for a safe, inclusive, healthy and enjoyable built environment	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • work with the NSW Healthy Planning Expert Working Group and councils to develop guidelines for planning, designing and developing a healthy and safe built environment; and • work with councils to support initiatives which allow for people to age positively on the Central Coast. 	<p>CEN is concerned that proposed development of floodplains (such as at Oscar Drive Chittaway) will leave people and communities at risk of injury due to access difficulties after significant weather events. The draft Plan should ensure that residents always have safe access to homes.</p>
DIRECTION 1.2 Grow and enhance liveable local centres		
ACTION 1.2.1 Prepare local plans for vibrant, liveable	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • support Gosford City and Wyong Shire Councils to 	<p>Strategies and reviews should ensure no reduction in the quality or quantity of high conservation value environments such as wetlands, EECs and</p>

local centres	prepare and implement local centre strategies and associated reviews of local environmental plans and development control plans.	foreshores. Infrastructure plans (including transport strategies) need to be developed at that same time as local centre strategies - rather than lag behind approved developments.
ACTION 1.2.2 Support development by directing investment to centres that will grow and change	The NSW Government will: <ul style="list-style-type: none"> • prioritise investment in infrastructure and services for areas experiencing growth or capable of delivering desired growth; and • support councils to identify opportunities to facilitate private investment in centres. 	Infrastructure should be planned at the same time as development proposals. This has not been the case for Gosford CBD with development proposals currently being approved with no plans that accommodate the increase transport and other infrastructure needs. We are concerned about the lack of transparency and accountability around these processes. It appears that non-complying developments are being encouraged behind closed doors with no regard to existing strategic planning processes.
DIRECTION 1.3 Create connected and accessible communities and centres		
ACTION 1.3.1 Facilitate accessible centres and communities	This draft Plan's proposal to concentrate employment activity within two regional economic corridors aims to support the delivery of an effective and efficient transport system. Priority improvements will focus on: <ul style="list-style-type: none"> • connecting to and through the regional economic corridors; • connecting the corridors and centres to Sydney and the Hunter via road and rail connections; and • improving public and active transport connections to and through the two regional economic corridors. 	CEN is concerned that current processes have prioritised the interests of developers above the need to ensure that an effective and efficient transport system is in place. Current approvals and proposals within Gosford CBD ignore the natural constraints of the topography and do not provide any confidence that the Government is genuine in their commitment to this action. CEN supports good public transport options that do not destroy high conservation value environments such as wetlands, EECs and foreshores.
DIRECTION 1.4 Accelerate housing supply		
ACTION 1.4.1 Coordinate infrastructure delivery to support the timely and efficient delivery of housing	The NSW Government will: <ul style="list-style-type: none"> • work with infrastructure providers to coordinate the delivery of infrastructure for land releases and existing urban areas to support development; • aim to undertake administrative and operational 	The Plan must clearly specify how the identified areas of high environmental value will be protected and enhanced.

	<p>improvements to the developer contribution system including improving management, accountability, reporting and transparency of State contributions;</p> <ul style="list-style-type: none"> • develop a revised service model and a new approach to planning school assets in the region; and • support councils and infrastructure providers to identify appropriate sites for infrastructure such as emergency service facilities, energy production and supply, waste disposal areas, cemeteries and crematoria. 	
ACTION 1.4.2 Monitor land and housing delivery	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • regularly liaise with councils and industry to monitor, evaluate and respond to blockages in housing supply. 	<p>CEN is concerned that the term "blockages" is a meaningless and political term often applied to environmental constraints.</p> <p>Some objective measures are needed with effective monitoring to prevent the continuation of land rezoning that favours developer needs at the expense of environmental and community considerations. .</p>
DIRECTION 1.5 Improve housing choice (Infill)		
ACTION 1.5.1 Support delivery of greater housing choice in and near centres with existing services	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • work with councils to: <ul style="list-style-type: none"> ○ identify planning controls in existing urban areas that will increase the range of housing types provided, particularly in and around centres and in locations with good public transport services; ○ identify other suitable centres and locations for infill housing such as The Entrance; centres on the Woy Woy Peninsula; Toukley; Terrigal; and Ourimbah; and identify blockages to growth and opportunities to facilitate 	<p>CEN supports the intent of this action for the delivery of greater housing choice in and near centres.</p> <p>However, CEN strongly opposes the recent moves by local Councils to reclassify public land for development without genuine community engagement and consultation.</p> <p>Recent processes have failed to properly assess the true social and environmental values of public lands that Councils have reclassified and then sold for development.</p>

	<p>growth;</p> <ul style="list-style-type: none"> • implement locally responsive affordable housing strategies; and • identify opportunities for re-use of surplus government land to support centres revitalisation and unlock investment. 	
<p>DIRECTION 1.6 Concentrate new development at Warnervale and elsewhere in North Wyong</p>		
<p>ACTION 1.6.1 Maintain up-to-date staging for new land release in North Wyong</p>	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • work with Wyong Shire Council to review the existing staging of land release and update, as required, to match delivery of local and State infrastructure to the planned timing for delivering each new community; and • review the <i>North Wyong Shire Structure Plan</i> to reflect the latest planning information regarding biodiversity, resources, development and infrastructure, and, where possible, provide greater certainty about issues associated with strategic sites. 	<p>This action is not consistent with other goals in the plan to "protect and manage the natural and cultural environment" and does not recognise the cumulative impacts of these decisions.</p> <p>We note that Wyong Council has a policy of not supporting wildlife corridors on private and public land. Recent planning decisions have destroyed or degraded high conservation value environments such as wetlands, EECs and foreshores that have been reclassified and sold for development.</p> <p>CEN requests that the NSW Government re-visit and update the Wyong Conservation Strategy, in consultation with local communities, in order to develop a strategic approach to biodiversity conservation and the protection of wildlife corridors in Wyong.</p>
<p>ACTION 1.6.2 Secure regional wildlife corridors and offset the biodiversity impacts of new development</p>	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • coordinate the development of a Biodiversity Offset Strategy for new development areas in northern Wyong with Wyong Shire Council; and • work with councils to identify opportunities to establish and manage landscape and biodiversity conservation corridors. 	<p>CEN has little confidence in the ability of biodiversity offsetting to protect the natural environment on the Central Coast.</p> <p>The WEZ was to have a coordinated Biodiversity Offsets Strategy to protect conservation lands with high conservation value environments such as wetlands, EECs and foreshores. We note that Wyong Council is now seeking to abandon that approach for 140 Sparks Road Warnervale in order to expand the Warnervale Airport.</p> <p>CEN requests that the NSW Government re-visit and update the Wyong Conservation Strategy, in consultation with local communities, in order to develop a strategic approach to biodiversity conservation and the protection of wildlife corridors in Wyong.</p>

ACTION 1.6.3: Support further cross-council boundary collaboration	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • support inter-regional land use and infrastructure planning between the Central Coast councils and adjoining councils; and • work with local government and service providers on cross-border issues. 	<p>CEN requests that boundary adjustments are supported as follows to improve environmental management and social amenity:</p> <ul style="list-style-type: none"> • North Wyong boundary – Boundary should be altered to ensure that the catchment of Lake Macquarie is under the management of Lake Macquarie City Council.
GOAL 2 – Grow and diversify the regional economy		
DIRECTION 2.1 Support the 21st century needs of business		
ACTION 2.1.1 Facilitate a local planning framework that supports business	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • support councils to regularly undertake reviews of local planning controls of industrial and commercial areas to: <ul style="list-style-type: none"> • better attract investment and business activity; and • encourage industry cluster formation and recognise freight activity precincts in employment lands. 	<p>The CEN supports the intention of this action subject to high conservation value environments such as wetlands, EECs and foreshores being maintained and protected.</p>
ACTION 2.1.2 Support the business development needs of industry	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • work with councils to identify and implement a range of strategies to support small business growth and innovation; and • work with councils and industry to prepare industry-specific planning strategies that support growth, and a regionally consistent planning approach for tourism, agriculture and other sectors, as required. 	<p>Agree - subject to high conservation value environments such as wetlands, EECs and foreshores being maintained and protected.</p> <p>CEN requests that the NSW Government declare the Peats Island area as protected from increased development and undertake steps to recognise and protect the unique features of this area as the gateway to the Hawkesbury River.</p>
ACTION 2.1.3 Manage and monitor land supply to enable a flexible and responsive planning environment for business	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • investigate programs to manage and monitor the supply of business space within centres; and • work with councils on changes to local environmental plans and local strategies to 	<p>CEN is concerned that this action gives a license for amendments to LEPs which may negatively impact the environment and local communities.</p>

and industry	respond to changing demands for land and floor space.	
ACTION 2.1.4 Coordinate infrastructure delivery to meet changes in demand for industrial land	The NSW Government will: <ul style="list-style-type: none"> work with councils and servicing agencies to coordinate infrastructure planning and delivery for employment and commercial land. 	
ACTION 2.1.5 Support other employment development areas and opportunities	The NSW Government will: <ul style="list-style-type: none"> work with councils and stakeholders to identify opportunities to support local employment and centres growth across the region. 	
DIRECTION 2.2 Maintain strong inter-regional connections for business		
ACTION 2.2.1 Strengthen freight and commerce connections between the regional economic corridors and Sydney and the Hunter	The NSW Government will: <ul style="list-style-type: none"> continue to work on the implementation of the <i>Central Coast Regional Transport Plan</i>; and work with councils to support freight corridors and activities, including the Northern Sydney Freight Corridor, freight activity precincts and future freight corridors. 	
DIRECTION 2.3 Grow Gosford City Centre as the region's capital		
ACTION 2.3.1 Support integrated planning for the Gosford City Centre and the Gosford Hospital health and wellbeing, waterfront, and arts and entertainment precincts to grow jobs	The NSW Government will work with Gosford City Council to: <ul style="list-style-type: none"> identify opportunities to support development in and around Gosford City Centre; and prepare precinct plans, where required, that will support delivery of more broad ranging plans for the city centre and the integration of other precincts within the centre. 	CEN is not supportive of the inconsistent approach to planning in the CBD. It has led to heights varying on each new proposal, no consideration of the infrastructure and transport needs and building standards being subject to change at any stage.
ACTION 2.3.2 Undertake strategic infrastructure and services planning	The NSW Government will work with Gosford City Council and other stakeholders to develop a long term transport framework for Gosford City Centre.	

DIRECTION 2.4 Focus growth within the Somersby to Erina Corridor		
ACTION 2.4.1 Expand the southern economic gateway	<p>The NSW Government will work with Gosford City Council to:</p> <ul style="list-style-type: none"> identify opportunities to expand the employment role of the Somersby economic gateway. 	<p>Agree subject to COSS and high conservation value environments such as wetlands, EECs and foreshores being maintained and protected.</p> <p>In addition, Piles Creek Catchment drains from this area through Brisbane Waters National Park and needs to be protected by utilising the Improve or Maintain standard for development in the Catchment.</p>
ACTION 2.4.2 Plan for a vibrant mixed use centre at Erina	<p>The NSW Government will:</p> <ul style="list-style-type: none"> support Gosford City Council's preparation of a local strategy for Erina to create a well-connected mixed-use activity centre, with enhanced urban amenity. 	<p>CEN does not support moves to rezone rural and environmental lands for residential development. This is in conflict with other actions within the draft Plan to protect natural environments, scenic qualities and cultural values.</p> <p>In addition, Erina Creek Catchment drains from this area into Brisbane Waters and needs to be protected by utilising the Improve or Maintain standard for development in the Catchment.</p>
ACTION 2.4.3 Protect environmental values along the Somersby to Erina Corridor	<p>The NSW Government will:</p> <ul style="list-style-type: none"> work with Gosford City Council to develop a plan that shows how future development and environmental values in the Somersby to Erina Corridor will be managed. 	<p>Agree subject to COSS and high conservation value environments such as wetlands, EECs and foreshores being maintained and protected.</p> <p>The draft Plan should provide mechanisms to ensure the strong protection of these environmental values.</p>
ACTION 2.4.4 Improve connectivity and amenity along the Somersby to Erina Corridor	<p>The NSW Government will work with Gosford City Council to:</p> <ul style="list-style-type: none"> increase road, public transport and pedestrian connectivity along the southern economic gateway; and prepare a plan for this corridor that identifies the infrastructure necessary to support growth and improve amenity. 	<p>Agree subject to COSS and high conservation value environments such as wetlands, EECs and foreshores being maintained and protected. Catchments need to be protected by utilising the Improve or Maintain standard for development in the Catchment. Connectivity for corridors crossing the connection need to be maintained.</p>
DIRECTION 2.5 Focus growth within the Tuggerah to Warnervale Corridor		
ACTION 2.5.1 Consolidate Wyong as the civic hub in	<p>The NSW Government will:</p> <ul style="list-style-type: none"> support Wyong Shire Council's preparation of a 	<p>Agree subject to Wyong River health and high conservation value environments such as wetlands, EECs and foreshores being maintained and</p>

the northern part of the region	local strategy to create a mixed-use activity centre at Wyong that provides improved residential and commercial opportunities and enhanced urban amenity, including a more pedestrian-friendly environment.	protected. In addition, Wyong River catchment drains this area to Tuggerah Lakes. Catchments need to be protected by utilising the Improve or Maintain standard for development in the Catchment.
ACTION 2.5.2 Create a diverse, connected and vibrant Tuggerah centre	The NSW Government will: <ul style="list-style-type: none"> support Council's preparation of a local strategy for Tuggerah to create a mixed-use activity centre and enhanced urban amenity, including a more pedestrian-friendly environment. 	Agree subject to no filling of wetlands or flood plains for island developments. In particular, planning needs to take account of existing issues in the area that will be made worse by rising lake/sea levels, acid sulphate soils and important natural areas and international waterbird habitats on the lake at Chittaway and Tuggerah Bay. Such development should be prohibited.
ACTION 2.5.3 Support Warnervale as the next town centre for the Central Coast	The NSW Government will: <ul style="list-style-type: none"> assist Council and other stakeholders to facilitate development on the Warnervale Town Centre site, including planning for the transport interchange. 	High conservation value environments such as wetlands, EECs and foreshores being maintained and protected as well as wildlife corridors across Porters Creek wetland and water quality issues. Maintain standard for development in the catchment to protect Porters Creek EECs and emergency water supply option from Porters Creek.
ACTION 2.5.4 Improve connectivity and amenity along the Tuggerah to Warnervale corridor	The NSW Government will work with Wyong Shire Council to: <ul style="list-style-type: none"> increase road, public transport and sense of place connectivity along the Tuggerah to Warnervale Corridor; and prepare a plan for this corridor to identify the infrastructure required to support growth and to improve amenity along the corridor. 	High conservation value environments such as wetlands, EECs and foreshores being maintained and protected. Pioneer Dairy is adjacent to the railway line and the EECs and wetlands need to be protected. Tuggerah area floods due to development being essentially at the level of the Lakes, this means such areas cannot be further developed without considering flooding impacts on neighbouring and upstream and downstream properties. CEN objects to any proposal to include the upgrade of Warnervale Airport in the Regional Plan.
DIRECTION 2.6 Enhance the Warnervale employment lands		
ACTION 2.6.1 Consolidate and update planning around the Sparks Road Corridor	The NSW Government will: <ul style="list-style-type: none"> work with Council to review planning which has occurred around the Sparks Road corridor. 	High conservation value environments such as wetlands, EECs and foreshores need to be maintained and protected.

ACTION 2.6.2 Resolve conservation issues	<p>The NSW Government will work with Council and developers so that:</p> <ul style="list-style-type: none"> • appropriate biodiversity planning occurs as land is planned and released in the northern areas of Wyong Shire; and • water quality issues are considered when planning for new development areas in Wyong Shire. 	<p>CEN requests that the NSW Government re-visit and update the Wyong Conservation Strategy, in consultation with local communities, in order to develop a strategic approach to biodiversity conservation and the protection of wildlife corridors in Wyong.</p> <p>An Improve or Maintain standard for water quality needs to be implemented for development in all water catchments.</p>
DIRECTION 2.7 Strengthen the economic self-determination of Aboriginal communities		
ACTION 2.7.1 Conduct a strategic assessment of land held by the region’s Local Aboriginal Land Councils to identify priority sites for further investigation of their economic opportunities	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • work with the Local Aboriginal Land Councils to identify priority sites so that each Council can create a pipeline of potential projects. 	Agreed - subject to high conservation value environments including wetlands, EECs and foreshores need to be maintained and protected.
GOAL 3 – Sustain productive landscapes		
DIRECTION 3.1 Promote investment in rural and resource lands		<p>Page 41 REMOVE para 7 beginning “Multiple land use planning....” (Justification) It does not reflect the fact of conflict between rural lands and extractive resources. Land is either productive agriculture and a water resource or it is alternatively resource land for extraction of minerals.</p> <p>The intent of Direction 3.1 contradicts that of Direction 4.2 “Sustain water quality and security” in its entirety. Also page 52 Figure 9 shows clearly the extent of the water drinking catchment in Wyong and the need for its ultimate protection.</p>
ACTION 3.1.1 Support development of the agricultural and aquaculture sectors	<p>The NSW Government will work with councils to:</p> <ul style="list-style-type: none"> • protect productive lands and resources from incompatible development; • identify and protect significant agricultural lands and aquaculture sites and activities; 	<p>Agree, gasfields and coal mining should be prohibited on agricultural and environmental lands.</p> <p>CEN supports sustainable use of agricultural lands and keeping such lands available for local food supply.</p>

	<ul style="list-style-type: none"> • facilitate the continuation and co-location of agricultural activities and related industries (supply chains, research and development); • retain and increase opportunities to keep fresh foods available locally; and • recognise and protect the economic potential of productive agricultural land to facilitate future agribusiness opportunities. 	
ACTION 3.1.2 Protecting the region's wellbeing and prosperity through increased biosecurity measures	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • work with councils to identify opportunities to minimise biosecurity risks for current and future industries through strategic planning, including a review of zones in local environmental plans; and • work with councils to promote the application of buffer areas to minimise biosecurity risks when assessing the potential impacts of new development. 	<p>Agree, Biosecurity needs to consider impacts on drinking water catchments. Recent approvals under delegation to allow chicken meat processing and waste disposal within the drinking water catchments is concerning. All chicken processing developments needed to be on a maintain or improve test basis and subject to rigorous independent assessment.</p>
ACTION 3.1.3 Plan for the ongoing productive use of lands with extractive resources	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • work with councils to identify significant extractive minerals and energy resource lands, including through the <i>NSW Mineral Resources Audit</i>; and • work with councils when preparing new local environmental plans or sequencing of land releases, to make sure that valuable resources are not sterilised 	<p>Extractive resources need to managed to not impact on water quality or groundwater into water supply creeks such as Ourimbah Creek where groundwater provides 40 % of the base flow.</p> <p>Page 44 REMOVE (Second last para) "Mining and energy production..." (Justification) This para is full of contradiction and supposition and not scientifically supported such as mining being "temporary". Mining aftermath usually leaves a wasteland, loss of water resources, impossible to rehabilitate effectively changing the land permanently.</p>
ACTION 3.1.4 Implement a robust assessment process for resource development	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • work with Council and industry to implement the <i>Integrated Mining Policy</i>, including finalising economic assessment guidelines; • develop a cumulative impact assessment methodology to manage the cumulative health and amenity impacts of all relevant activities 	<p>CEN opposes any moves for further resource or extractive industries on the Central Coast. (Please refer to section on Climate Change in General Comments).</p> <p>We further note that mining and coal dust fines is a serious concern to residents and the Central Coast environment. Drinking water catchments should be protected from damage by prohibiting mining and other extractive</p>

	<p>(including mining and coal seam gas proposals) that consider:</p> <ul style="list-style-type: none"> • whether cumulative impact thresholds or tipping points can be adequately described and predicted; and • the cumulative impacts on agricultural lands and water resources; • investigate appropriate methods for encouraging best-practice rehabilitation and visual impact management for closed mines; and • prepare a development assessment guideline to mitigate impacts on human health from dust (including dust generated by mining and other activities). 	industries.
DIRECTION 3.2 Manage rural lifestyles sustainably		
ACTION 3.2.1 Support services and employment in local communities	<p>The NSW Government will work with councils and rural communities to:</p> <ul style="list-style-type: none"> • identify capacity to accommodate employment growth, in appropriate locations; • strengthen rural villages through the clustering of services, housing and other activities; and • protect the character and amenity of rural areas. 	Agree high conservation value environments including wetlands, EECs and foreshores need to be maintained and protected. Corridors and COSS lands should be protected by the plan.
ACTION 3.2.2 Manage future rural residential opportunities, where appropriate	<p>The NSW Government will work with councils to:</p> <ul style="list-style-type: none"> • prepare guidelines for future rural residential development, encapsulating the draft principles outlined above; and • assess the implications of new or sequenced urban release areas on existing and known resource lands. 	<p>The Regional Plan should continue the policy of no urban development west of the Freeway.</p> <p>This protects our environment, water supplies and infrastructure strategy.</p>
GOAL 4 – Protect and manage the natural and cultural environment		
DIRECTION 4.1 Protect and manage the region’s environmental and heritage values		

ACTION 4.1.1 Protect areas of high environmental value	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • provide planning authorities with mapping and spatial data of environmental features, particularly for areas proposed for land use change or intensification; • support planning authorities to undertake strategic, landscape-scale assessment of terrestrial and aquatic biodiversity; • require councils to avoid and minimise impacts of development on areas of high environmental value, and where impacts cannot be avoided, identify and secure appropriate biodiversity offsets through an offset strategy, developed via negotiations with the Office of Environment and Heritage and the Department of Primary Industry, Fisheries; and • protect fish and aquaculture habitats (waterways, wetlands and tidal lands) and sensitive estuaries and coastal lakes from inappropriate development. 	<p>CEN calls on the State government to</p> <ul style="list-style-type: none"> • introduce mechanisms within the Gosford LEP to complete the implementation of the COSS system in Gosford LGA • Implement previous State government commitments to introduce an E5 Zone to protect COSS lands • undertake investigations, develop a strategy and maps to carry the COSS forward in Wyong LEP. <p>CEN requests that the NSW Government re-visit and update the Wyong Conservation Strategy, in consultation with local communities, in order to develop a strategic approach to biodiversity conservation and the protection of wildlife corridors in Wyong.</p> <p>North South Regional Corridors through Porters Creek and in East West in other parts Wyong should be maintained. The Wyong Council policy of no corridors on private or public land should be overridden in the plan.</p>
ACTION 4.1.2 Identify and protect heritage values	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • support the preparation of appropriate heritage studies to inform the development of strategic plans, including regional Aboriginal cultural heritage studies. 	<p>Agree - high conservation value environments including wetlands, EECs and foreshores being maintained and protected.</p> <p>CEN requests that the NSW Government declare the Peats Island area as protected from increased development and undertake steps to recognise and protect the unique features of this area as the gateway to the Hawkesbury River.</p> <p>Maintaining the aesthetic of the Hawkesbury Valley should be government planning policy which would protect a world class landscape from inappropriate development.</p>
DIRECTION 4.2 Sustain water quality and security		
ACTION 4.2.1 Secure the	The NSW Government will:	Agreed

Central Coast's water supply	<ul style="list-style-type: none"> • continue working with the Gosford-Wyong Joint Water Supply Authority and Hunter Water Corporation on options to enhance the existing water transfer agreement, to benefit both regions; • work with the councils to review the region's long term water plan, <i>WaterPlan 2050</i>, to facilitate the ongoing environmental health of the region's waterways, optimise yield during high flow periods and update drought contingency and transfer agreements; • use appropriate provisions to protect water catchment areas and groundwater sources from the potential effects of development. Any development should have a neutral or beneficial effect on the region's water quality; and • work with councils to identify the need for further water sharing plans, based on the growth of the resources sector. 	<ul style="list-style-type: none"> • High conservation value environments including wetlands, EECs and foreshores being maintained and protected. • Catchment protection standards and no go areas are need to halt pressure for development west of the freeway. • CEN supports the water supply authority being under an Operating Licence to guarantee water standards and transparency. • Zoning of groundwater resources in the Kulnura Mangrove Aquifer need to be maintained to protect high conservation value environments such as wetlands, hanging swamps, EECs and National parks from drying out.
ACTION 4.2.2 Sustainably manage surface and groundwater	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • require decision-makers to minimise the effects of development on waterways (including watercourses, wetlands, riparian lands, estuaries, lakes, beaches and marine waters) to meet Water Quality and River Flow objectives; and • implement a risk-based decision-making framework to manage water quality and waterway health in the region, including the catchments of all coastal lakes and estuaries where there is planned development, prioritising high environmental value lakes and estuaries, or identified key fish habitat/marine protected areas; • work with councils to enforce the NSW 	<p>Agreed</p> <ul style="list-style-type: none"> • Water Authority needs an Operating Licence (as further outlined in General Comments) • Catchments for Lakes and waterways outside drinking water catchments need to be subject to maintain or improve test criteria . • Areas of high PASS need to be prohibited from development and lake foreshores with EECs or important waterbird habitat.

	<p>Government's guidelines for 'Controlled Activities' through resource development approval and monitoring processes; and</p> <ul style="list-style-type: none"> require that planning and development proposals include measures to reduce the risk of introduction or spread of aquatic pests and diseases that may impact fisheries and aquaculture industry practices. 	
<p>DIRECTION 4.3 Protect the coast and manage natural hazards and climate change risks</p>		
<p>ACTION: 4.3.1 Apply contemporary risk-management to coastal, man-made and other hazards</p>	<p>The NSW Government will:</p> <ul style="list-style-type: none"> work with councils to incorporate the best available hazard information and mapping of all vulnerable estuaries, coastal lakes and their catchments in planning controls; require that councils review and update their floodplain risk and coastal management plans, particularly where growth is being considered that may be affected by natural hazards; complete the Coastal Reform Program to respond to community concerns about coastal hazard management; prohibit new urban releases in high flood hazard areas and designated floodways, consistent with Coastal and Floodplain Management Plans; 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; develop strategic and incident based bushfire actions such as emergency evacuation areas for the mountains community and other isolated communities; and 	<p>Please see comments in General Comments related to Climate Change.</p> <p>Please also note our comments on the Coastal Reform Process as attached.</p>

	<ul style="list-style-type: none"> • develop emergency management actions such as flood and coastal response plans. 	
ACTION: 4.3.2 Plan for a changing climate	<p>The NSW Government will:</p> <ul style="list-style-type: none"> • consider the effect of sea level rise and climate change in flood planning for urban release areas and infill urban areas; incorporate new knowledge on regional climate projections and related impacts; and prioritise resilience to climate change in the siting and development of infrastructure and land use; • support communities to understand and respond to climate-related risks by applying and communicating detailed climate information to support decision-making; and • build resilience against such events by supporting regional decision-makers to identify and implement climate change adaptation projects and programs. 	Refer to our comments in Climate Change in General Comments.