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**Re: Draft Central Coast Regional Plan**

**Please find below my submission on the draft plan**

**ESD**

The principles of ecologically sustainable development (ESD) need to be an essential part of the vision and goals for the draft Plan and all elements underneath this. This should include the formal adoption of the precautionary principle in the Plan. The natural environment is the region's key asset and it is essential that its protection is the foundation of any planning for the region for our future well being.

**Protection of the Environment**

As a part of this protection it is essential that the Regional plan explicitly supports the COSS strategy. The COSS strategy is a highly successful and the long term mechanism to protect our ridgelines. The regional plan should include government commitment to introduce an E5 zone to be applied to COSS lands in public ownership. This must be fully implemented in the Regional Plan and gazetted at the same time that the Regional Plan is finalised.

The current plan is inadequate in relation to the protection of the natural environment and should be strengthened in this regard throughout. We are currently losing many of our mature trees in urban areas due to the policies of both Councils (e.g. *the State's 10:50m regulations*), whilst in other areas of Sydney the value of tree cover to cool residential areas and reduce energy costs is well recognised.

Protection for vulnerable and endangered ecological communities and flora and fauna needs to be included in the plan. Land of high conservation in general should be protected from development.

**Protection of reserves/pocket parks and community land**

The plan should include some standards of public open space /per population which should be provided. Councils are currently attempting to sell valuable community reserve land that is needed both now and in the future for our growing population. Some of this land was a required S94 contribution by developers. It seems ludicrous that Gosford Council is now trying to profit by selling it off, when the population is growing exponentially as a result of this development.

Page 17 of the plan refers to *maximising the use of bushland*. This statement needs to be qualified as some areas need to be protected as passive open space whose primary purpose is conservation (flora and fauna), as well as to provide visual amenity and contribute to air quality and urban cooling. etc.

**Climate Change**

The plan does not reference or include any recommendations (apart from a few very broad statements) on climate change. It has not referenced any of the major National research on this issue nor enacted any of the recommendations from this research. Given the vulnerability of much public infrastructure as well as environmental, residential and commercial assets in the region – this is a major omission and should be rectified.

**Air Quality**

No mention is made regarding the issue and importance of air quality. Given recent National data which shows the decline of air quality, this is a critical issue which should be addressed in the plan. Wyong in particular has been identified as an area with high air pollution levels. See:

<http://www.smh.com.au/environment/sydney-air-pollution-exceeds-national-standards-nsw-environmental-protection-authority-report-shows-20151230-glwzck.html>

### **Biodiversity offsetting**

I do not support the use of biodiversity offsetting except in the most limited of circumstances, and only where a very clear environmental benefit can be demonstrated. The current system is being abused and is resulting in a huge loss of bioiversity. The reliance on this mechanism should be reduced in the Plan.

Documented and researched weaknesses of offsetting include “ (1) *the narrowness of the definition of biodiversity;* (2) *(the fact that) .. the concept is based on a flawed logic and immature, imprecise and complex science which results in difficulties in determining biodiversity values;* (3) *problems with management and compliance;* and (4) *an overall lack of resources for implementation and long-term monitoring.*” (adapted from Burgin S. 2008)

### **Food and water security**

Greater protection of our agricultural and horticultural lands and water resources should be included in the plan and given priority over other land uses such as mining or industry.

### **Coastal areas**

Greater emphasis should be placed on retaining the environmental qualities of our coastline as well as public access to all foreshore areas, rather than their commercial exploitation.

Managed retreat should be the policy adopted for coastlines vulnerable to storm surge as we do not have the resources to try to rescue unsustainable development in these locations. We need to move away from past policies of privatising development profits and publicising the risk and loss caused by these developments.

### **Public Transport**

The lack of a clear public transport strategy and implementation plan for the region is disturbing. This needs to be developed and implemented at the same time as the regional plan.

### **Quality Affordable Housing**

The focus on affordable housing needs to be increased with specific actions included. Current infill development (as per the draft plan) is decreasing the availability of affordable housing, as older cheaper houses are demolished and new ones at much higher cost (for buyers and renters) are built. Specific actions which support energy efficient low income housing should be included in the plan. There is a marked absence of planning for **quality** and affordable housing in the plan with accompanying and timely infrastructure.

The comments in the Plan that housing on the Central Coast is more affordable than Sydney is gratuitous in the context of any plan for affordable housing. With the aged pension at \$422 per week (*with a possible maximum of \$60 in rental assistance*), how can Granny flats now rented on average for \$350 - \$480 pw be affordable? Other Centrelink benefits are even lower than the aged pension. We desperately need a plan for affordable housing (for buyers and renters) in this Regional Plan.

### **Granny flats**

The impact of the current policy on granny flats should be evaluated. Much of this activity is driven by developers and is resulting in high cost general rental accommodation not designed for, or suitable for an ageing population. At the same time, we are losing much of our urban tree cover as back yards are cleared of vegetation to make way for these flats. No parking or proper access is provided and this is resulting in conflict with existing residential developments, as more and more cars compete for the same on street spaces.

On the Woy Woy Peninsular Many flats are built with access onto back lanes which are not sealed and soon Council will be expected to maintain these to a higher level than their current gravel surface, as they are being used as major thoroughfares. Who will pay for this cost? The developer has not contributed any S94 contributions towards such works. It is also questionable that the current sewage, water, and drainage facilities can cope with such unplanned development/population growth.

The increase in hard surfaces is exacerbating flooding on the Woy Woy Peninsula and given the topography, drainage works will not solve the problem. We need to have more areas including passive open space to allow natural filtration and to limit the % of hard surfaces on private properties. At present the situation is another one of privatising development profits and publicising loss, as residents call for more public works to solve these newly created or exacerbated drainage problems.

**Footpaths/bikeways**

The plan should include the prioritising of footpaths and bikeways – separately from kerb and guttering priorities. Footpaths have far more impact on community well being than other infrastructure works, without such infrastructure – ageing in place will not be possible.

**I also support the submissions of the** Nature Conservation Council of New South Wales and the Community Environment Network.