

# Submission to the NSW Government's Draft Central Coast Regional Plan

## Vision and Goals:

- 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.

## Failure to provide adequate protection for the environment:

- While the draft Plan does identify areas of high environmental value (Figure 9: Environmental Assets, p 52), it does not provide adequate protection for those areas (e.g. no-go zones and/or clear restrictions on impacting development). The Plan must clearly specify how the identified areas of high environmental value will be protected and enhanced.
- The plan needs to ensure the protection of water, including both surface and groundwater ecosystems.

## Coastal Open Space System (COSS)

- The COSS is unique to our region, 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 Oct, 2014, 63% of the land (by area) identified for COSS had been acquire by Council. The Regional Plan must 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 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.
- 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.

## Failure to resolve land use conflicts

- The draft Plan identifies a range of land use values including areas of high environmental value (Figure 9: Environmental Assets, p 52), Biophysical Strategic Agricultural Land (Figure 7: Selected Primary Industries, p42) and identified and potential mineral resources (Figure 8: Central Coast Mining, 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 our 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.

### **Heavy reliance on biodiversity offsetting**

- The draft Plan places too high an emphasis on biodiversity offsetting. Biodiversity offsetting is not appropriate in all circumstances.
- The draft Plan must identify 'red flag' areas (e.g. coastal catchments, areas of endangered ecological communities or threatened species habitat) that are not appropriate for biodiversity offsetting.
- 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 provided within the Central Coast region.

### **Infrastructure Planning for Growth**

- Although we recognise the merits of growing Gosford City Centre, the draft Plan fails to adequately outline infrastructure improvements that will accompany growth. 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, however, these appear in the plan as vague statements that "the NSW Government will work with Gosford City Council and other stakeholders to develop a long term transport framework for Gosford City Centre."

This is a completely inadequate response to the proposed growth in development and transfers responsibility between agencies, rather than giving any confidence that infrastructure (in particular, transport) planning is well advanced.

- The Draft Plan should require a Transport Plan to be produced and exhibited before the final draft Regional Plan is adopted.

### **Protection of Central Coast Drinking Water Catchments**

- 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 it has the potential to affect the aquifer.

- 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).
- The Regional Plan should require the implementation of an Operating License for the Water Authority(s) for the Central Coast - this does not currently exist. The Operating License would ensure transparency and accountability within our 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.

### **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.

### **Proposal 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 strongly oppose any move to develop a Regional Airport on the Central Coast for the following reasons:
  - 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.

### **Implementation of the Draft Plan**

- The delivery of the final Plan will be by the Coordinating and Monitoring Committee, 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 reduced if Gosford and Wyong Councils amalgamate.
- 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.
- Consideration should also be given to community input into the implementation of the plan. For example, Illawarra Environment and Resources Groups have been identified as relevant supporting groups under the Illawarra-Shoalhaven Regional Plan.

### **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.
- 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.