

Department of Planning and Environment
Central Coast Office
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Gosford NSW 2250

By email: centralcoast@planning.nsw.gov.au

18 November 2014

Submission on Your future, Central Coast, A Discussion Paper, September 2014

Dear Sir/Madam,

The Nature Conservation Council of NSW (**NCC**) is the peak environment organisation for New South Wales, representing 130 member societies across the state. Together we are committed to protecting and conserving the wildlife, landscapes and natural resources of NSW.

The Total Environment Centre (**TEC**) has been campaigning for environment protection in the city and country, changing government policy, advising the community and challenging business for over 30 years. TEC has been working to protect this country's natural and urban environment, flagging the issues, driving debate, supporting community activism and pushing for better environmental policy and practice

We welcome the opportunity to comment on *Your future, Central Coast, A Discussion Paper*, September 2014. The discussion paper is the first step in the development of a Central Coast Regional Growth and Infrastructure Plan (**CCRGIP**).

While we are in support of improved strategic planning processes in NSW, we recognise that the current roll out of Regional Growth and Infrastructure Plans is happening outside of a clear legislative framework requiring mandated environmental assessment or public participation. In our view, this does not provide a suitable basis for long term strategic planning, including the proper consideration of vital long term issues such as ESD, biodiversity and connectivity, access to green space and infrastructure, climate change and population planning.

Land use planning and development is intrinsically linked with environmental protection, nature conservation and natural resource management (NRM). This is because actions that may affect the environment and our natural resources are regulated, either directly or indirectly, through the planning system. The impact of planning and development on the environment is therefore a key consideration for decision makers in preparing planning instruments and determining development applications. Conversely, land use planning has the potential to support the achievement of environmental outcomes including the protection and sustainable management of water resources, biodiversity, agricultural land and basic raw materials.¹

¹ *Directions Paper on the Integration of NRM into Land Use Planning, Directions Paper on the Integration of NRM into Land Use Planning*
Published by the Western Australia Planning Commission as part of the EnviroPlanning project initiated in late 2005 through a partnership

It follows that the roll out of Regional Growth and Infrastructure Plans across NSW will have significant impacts for the environment and communities. Effective strategic planning is particularly important for identifying objects and outcomes for regional planning that deliver environment and social outcomes, identifying and ensuring protection for high conservation areas and environmentally sensitive areas, resource and waste management efficiency, resolving land use conflicts and identifying and managing threats to the environment into the future.

It is imperative that the Department of Planning and Environment ensures that ecologically sustainable development is at the heart of regional planning and there mechanisms in place for ensuring that regional plans will deliver necessary environmental and social outcomes, now and in the future.

The natural environment of the NSW Central Coast is an integral part of the region's identity. Regional bushland areas are rich in biodiversity and natural beauty. Wildlife corridors are important for connecting key habitats for local species, including koalas, southern brown bandicoot, and spotted-tailed quoll. The local waterways are important for the wellbeing of the community and the local native wildlife, including hundreds of species of birds and fish.

With an expected 64,250 new residents in the area over the next 20 years², it is important that the long-term planning for the area recognises the environmental constraints in accommodating this growth and effectively avoids and mitigates potential impacts on the sensitive environments of the NSW Central Coast.

Our submission will outline:

1. Key concerns with the overarching framework of the Discussion Paper and the regional planning process
2. Specific comments on key aspects of the Discussion Paper.

We must see a regional planning process that recognises the environmental constraints of growth and development, and delivers the necessary environment, social and economic outcomes for the Central Coast, now and for the future, while meeting environmental sustainability.

KEY CONCERNS WITH THE OVERARCHING FRAMEWORK OF THE DISCUSSION PAPER AND THE REGIONAL PLANNING PROCESS

We have significant concerns about the direction of this NSW Planning and Environment discussion paper. The paper gives only token consideration to environmental issues, in spite of the Minister's assurances about 'protecting our environment' in the Foreword. The emphasis of the Paper is on economic growth in the region, rather than ecologically sustainable development.

The Discussion Paper fails to provide for the adequate integration of environment and natural resource management considerations in the regional planning process. While there is a strong emphasis on integration between planning and infrastructure, the Discussion Paper does not provide the same level of support for the integration of environment and natural resource management considerations. Another key aspect for consideration is the region's environmental footprint in terms of energy use, water and air pollution and waste disposal.

between the Western Australian Planning Commission, the former Department for Planning and Infrastructure, and the Western Australia Local Government Association (WALGA) with the aim of improving the integration of NRM into land use, planning across the State. Available at: http://www.planning.wa.gov.au/dop_pub_pdf/NRM_report.pdf

² *Your future, Central Coast, A Discussion Paper*, Department of Planning and Environment, September 2014

Our 2012 report, *Our Environment, Our Communities - Integrating Environmental Outcomes and Community Engagement in the NSW Planning System*, outlines key elements for integrating environmental considerations into strategic planning processes.³ These include:

- A whole-of-Government approach to strategic and land use planning
- Carrying out of baseline studies and strategic environmental assessment
- Sharing of data across sectors
- Integration of environmental policy and legislation
- Identification of competing land uses and values and mechanisms for achieving environmental outcomes
- Appropriate statutory weight for and hierarchy between planning instruments
- Community engagement in strategic and land use planning processes

In our view, the strategic planning process underpinning the Discussion Paper and proposed Central Coast Regional Growth and Infrastructure Plan fails to adequately integrate environmental considerations into the process. As such, it is unlikely that the proposed Central Coast Regional Growth and Infrastructure Plan will deliver the necessary environment and social outcomes needed for the central coast in following decades. Our key concerns are outlined below.

Failure to adopt the key principles of ecologically sustainable development

Ecologically sustainable development (ESD) is one of the objects of the *Environmental Planning and Assessment Act 1979* and must underpin the strategic planning process, however ESD is not mentioned in the discussion paper.

We argue that the CCRGIP which arises from this discussion paper should have a major focus on the principles of ESD as set down in NSW legislation. The department needs to recognise that under the principles of ESD, areas of high conservation value and environmental sensitivity can be significant constraints to the kinds of growth and development advocated in this discussion paper. These constraints cannot always be argued away by scientifically inaccurate and developer biased concepts of biodiversity offsets.

A whole-of-Government approach to strategic and land use planning

The Discussion Paper has a strong emphasis on the integration of infrastructure and planning, but it is not clear how other key elements, such as environment, resources, water, health, agriculture, primary industries, waste management and social services will be integrated into the regional planning process and managed in the future. For example, in the context of integrating environmental considerations into strategic planning, we note that the NSW Local Government and Shires Association (now Local Government NSW) identifies nine agencies that are responsible for the environment and natural resource management in NSW.⁴

It is essential that in moving forward and preparing the draft CCRGIP that the Department of Planning and Environment establish a clear and transparent process for engaging other Government agencies, including the

³ Nature Conservation Council of NSW and Total Environment Centre, *Our Environment, Our Communities - Integrating Environmental Outcomes and Community Engagement in the NSW Planning System* May 2012

⁴ The following agencies are identified as having a role in NRM in NSW: Natural Resources Commission, Department of Environment and Climate Change (now the Office of Environment and Heritage), Catchment Management Authorities, Department of Planning (now the Department of Planning and Infrastructure), Department of Primary Industries, Department of Water and Energy (now the NSW Office of Water and the Division of Minerals and Energy within Industry & Investment NSW), Department of Lands (now abolished and functions split between Department of Finance and Services and Department of Primary Industries), Sydney Catchment Authority and Rural Fire Service. *Integrating Natural Resource Management into Local Government Operations - Volume 2: Land Use Planning*, prepared by UTS Centre for Local Government, Gibbs Consulting, Walsh Consulting, (principal author Planning Volume Walsh Consulting) Available at: http://www.lgsa.org.au/resources/documents/NRM_Guidelines_Land_Use_Planning_020709.pdf pp 8-10.

Office of Environment and Heritage (which we recognise now sits within the Department of Planning and Environment) in the regional planning process.

Carrying out of baseline studies and strategic environmental assessment

Best practice strategic and land use planning must be underpinned by scientific, factual and up-to-date data. It is impossible to effectively develop long term strategic plans without a clear understanding of the existing state of the environment and an assessment of the impacts of planned future growth and development on the environment.⁵

Page 19 of the Discussion Paper identifies research that will underpin the development of the Central Coast Regional Growth and Infrastructure Plan. While it identifies, for example, information about housing and employment markets and the feasibility and viability of development in new development areas, it fails to recognise the need for an environmental study.

Strategic environmental assessment aims to provide for a high level of protection of the environment and contributes to the integration of environmental considerations in the preparation and adoption of plans and programs with a view to promoting sustainable development.⁶ This outcome is achieved through setting minimum requirements for environmental assessment processes alongside plan preparation, including:

- an assessment of the existing state of the environment,
- identification of the likely environmental impacts of the development envisaged in a plan (including cumulative impacts), and the consideration of reasonable alternatives,
- consultation on an environmental report on the plan at the same time as on the plan itself, and
- ongoing monitoring of the significant effects of implementation of the plan.⁷

We strongly argue that an environmental study must be carried out prior to the preparation of the Central Coast Regional Growth and Infrastructure Plan, and publically exhibited along with the draft Plan.

Sharing of data across sectors

The Discussion Paper is heavily focused on existing data and statistics relating to population projections, dwelling projections, housing affordability, infrastructure and transport. It fails however to explain how existing environmental information and policies will be used to integrate environment protection and natural resource management into the planning process.

An extensive set of data already exists in NSW and Australia that can be utilised to support strategic and land use planning processes. This information can assist in preparing an environmental study to underpin the planning

⁵ Nature Conservation Council of NSW and Total Environment Centre, *Our Environment, Our Communities - Integrating Environmental Outcomes and Community Engagement in the NSW Planning System* May 2012

⁶ See for example, Sadler, B. and R. Verheem, 1996, *Strategic Environmental Assessment: Status, Challenges and Future Directions*, Ministry of Housing, Spatial Planning and the Environment, The Netherlands. See also *UNECE Protocol on Strategic Environmental Assessment to the Convention on Environmental Impact Assessment in a Transboundary Context* (commonly referred to as the SEA Protocol) (available at: http://live.unece.org/env/eia/sea_protocol.html)

⁷ See also the Hawke report, which makes recommendations as to the framework for strategic assessment, Hawke, A. (2009), *Report of the Independent Review of the Environment Protection and Biodiversity Conservation Act 1999*, October 2009, see in particular 3.43 – 3.50. In summary, such a framework should require an assessment of the extent to which a plan, policy or program:

- protects the environment
- promotes ESD
- promotes the conservation of biodiversity
- provides for the protection of heritage
- set minimum standards of acceptable environmental impacts (including and assessment of cumulative impacts) and
- set of higher level considerations, for example for any subsequent development approval

process. For example, the Spatial eXchange (SIX) is set up as the official source of spatial data for NSW.⁸ Other information sources could include:

- information accumulated by catchment management authorities, particularly as part of their work in preparing regional catchment action plans,
- information held by the various divisions of the Office of Environment and Heritage, with respect to water, threatened species, endangered ecological communities and coastal processes,
- statistics and projections held by transport and infrastructure agencies,
- state and federal State of the Environment Reports,
- statistics and projection from the Australian Bureau of Statistics.

Integration of environmental policy and legislation

In order to further ensure a whole-of-Government approach to strategic and land use planning, the draft CCRGIP must align with other Government strategies, or else there is a risk of the CCRGIP undermining work being done by other areas of Government.

It must also draw on work that has already been done in assessing the regional environment and planning for its future management. This includes, for example:

- 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

Identification of competing land uses and values and mechanisms for achieving environmental outcomes

The Discussion Paper does not provide adequate detail as to exactly how the regional planning process will provide for the identification of competing land uses or delivery of environment outcomes, or how the community will be able to participate in this important process.

In moving ahead and preparing the draft CCRGIP there must be a clear and transparent process for identifying competing land uses and values, and providing mechanisms for assigning appropriate land uses.

For example, consideration must be given to identifying and providing adequate protection for:

- Significant habitat corridors.
- High level protection zones. The regional planning process must identify sensitive areas where certain kinds of development (such as mining) are prohibited, based on an assessment of environmental, water supply, social and agricultural value criteria and risk; and recognition that ‘management of impacts and monitoring’ is not a sufficient risk avoidance strategy.
- Areas for which prescribed controls would apply (e.g. coastal protection zones).

⁸ See <https://six.nsw.gov.au/wps/portal/>.

In order to achieve environmental outcomes, the regional planning process should prescribe environmental thresholds (such as a rigorous 'improve or maintain' test) that must be met by a regional plan. For example, the former Local Government and Shires Association suggests that consideration be given to initiating an "improve or maintain target for all significant natural resource features in strategic land use planning".⁹

Further, there must be a mechanism in place for assessing the potential cumulative impact of the draft Plan, for example pollution and carbon emissions.

Appropriate statutory weight for and hierarchy between planning instruments

The Discussion Paper does not adequately explain how the new CCRGIP will relate to other environmental planning instruments, including existing local environment plans or State Environmental Planning Policies. It is also not clear on its relationship to other strategic planning documents including the existing Central Coast Regional Strategy 2006 – 2031.

Community engagement in strategic and land use planning processes

Genuine and meaningful public participation has the benefit of empowering local communities, utilising local knowledge and improving decision making by assisting decision makers to identify public interest concerns. It also promotes community 'buy-in' of decisions which can reduce potential disputes and can help to ensure fairness, justice and accountability in decision making.

Effective public participation needs to do the following:

1. Inform – the information provided should be transparent, accurate and easy to understand.
2. Engage – the process is not simply the passive supply of information but seeks to encourage views and engage informed opinion.
3. Interrogate – information can be complex but resources should be provided to allow interrogation and translation.
4. Facilitate dialogue – there should be attempts to bring various stakeholders together to devise solutions on a level playing field.
5. Evaluate – the success or otherwise of the effort is reviewed and lessons learnt.

Feedback from our members and supporters on the Central Coast, is that community participation on the central coast has not been adequate and planning processes are being undermined.¹⁰ Moving ahead, we strongly encourage the Department to continue engage with the community as it starts to prepare the draft CCRGIP.

⁹ *Integrating Natural Resource Management into Planning Schemes materials - A guideline for Queensland Local Governments*, Local Government Association of Queensland, 2007 Available at:

www.lgaq.asn.au/c/document_library/get_file?uuid=21fd58f8bad67e8435d933489732c3df&groupId=10136

¹⁰ For example, the Gosford Local Environment Plan was recently adopted after a significant period of consultation with a broad range of stakeholders. However in the last 10 months, Council has received over 15 Planning Proposals which would result in an amendment to the LEP. This would suggest that Councils and the State government continue to practice ad hoc planning rather than implement good strategic planning based on community and stakeholder participation.

SPECIFIC COMMENTS ON KEY ASPECTS OF THE DISCUSSION PAPER

Our comments on key aspects of the discussion paper are provided below.

Chapter 3

- **Key Challenges Facing the Central Coast**

In our view, the Discussion Paper fails to adequately identify environmental challenges facing the Central Coast. The 'key challenges facing the central coast' identified in Chapter 3 (page 12) are all typical planning challenges in a growth scenario, without identifying the important constraints to growth that exist on the NSW Central Coast. The Discussion Paper fails to identify any of the environmental and natural resource challenges that the region faces. By contrast, the existing Central Coast Regional Strategy identifies that "*the health of the Region's water sources is one of the greatest challenges that the Region faces*".¹¹ It also identifies the following key environmental challenges:

- providing a sustainable long-term water supply
- providing a balance between future development and important conservation values
- improving identification, protection and enhancement of natural environments, including significant biodiversity corridors, regionally significant vegetation, coastal lakes and estuaries, and landscape values
- managing stormwater to protect downstream receiving environments and identifying opportunities for sustainable use of this valuable resource
- improving understanding of Aboriginal cultural heritage values and incorporating this information within land use planning and natural resource management processes allowing for development and redevelopment while protecting significant cultural heritage
- accepting the value of rural lands as food-producing lands and ensuring the long term protection of these assets
- managing natural hazards in new developments, including flooding, coastal erosion and inundation (including the impacts of climate change), land instability, bushfire and acid sulphate soils.¹²

- **Other Comments:**

- '*Significant engagement with local communities*' (p10) must mean more than just token community consultation. We support genuine community planning consultation, with respectful consideration of community submissions and a willingness by the department to modify plans in areas the community has identified as unacceptable for development on scientifically valid environmental grounds. See our earlier comments, above.
- The plan has to do more than just provide a framework for more growth, as the dot points on page 10 suggest. Rather, the Regional Growth and Infrastructure Plan should provide a framework for ecologically sustainable development. Further, the fact that environmental issues are not listed here illustrates a need for amending the plan to incorporate the concept of environmental constraints to the planned growth, for example, identifying 'no go zones' such as areas of environmental sensitivity and high conservation value.

¹¹ Central Coast Regional Strategy 2006 – 2031, Department of Planning, page 5

¹² Ibid, page 7.

- On page 15, the paper talks about identifying and protecting conservation areas of regional significance, but there is no evidence of a mechanism to identify or protect these areas in the discussion paper. Identifying and protecting such areas need to be more than just high sounding words with no substance to back them up.
- The Discussion paper relies too heavily on ‘*offset mechanisms*’ to manage environmental constraints and proceed with planning proposals. Offset mechanisms are not the answer to ‘*unavoidable biodiversity impacts*’ and are not an appropriate mechanism for justifying development in high conservation value areas. The concept has been significantly discredited in the NSW Land and Environment Court.¹³
- We support the banning of new coal seam gas (CSG) exploration for large areas of the Central Coast by the NSW Government (page 15). As the State Government is well aware, the damage to communities and the environment caused by CSG exploration and extraction in inappropriate areas is an issue of high community concern. However, we do not think the current exclusion zones are adequate, or provide the necessary protection for the Central Coast drinking water catchments. Specifically, we submit that coal seam gas mining in the vicinity of Peats Ridge and also Wollombi, Grumps Retreat and Bucketty, (as identified in *The Lower Hunter over the next 20 years, A Discussion Paper*, March 2013¹⁴), should not proceed as they have the potential to affect the aquifer.
- Further, in order to adequately protect the Central Coast’s water resources, we submit that all coal seam gas and long wall coal mining activities should be banned in the Central Coast drinking water catchments.

Chapter 4:

- **Principles that guide our planning**

Page 19 of the Discussion Paper outlines ten principles guiding the preparation of the new Central Coast Regional Growth and Infrastructure Plans. We do not support these principles as written.

As outlined above, ESD must underpin strategic planning and therefore must be listed as one of the principles guiding the strategic planning process. We are also concerned that the guiding principles are heavily weighted towards economic growth and ‘cutting red tape’, and will not deliver environmental and social outcomes.

In our 2012 submission to the NSW Planning System Review Green Paper, we recommended the following objectives for strategic planning (based on Recommendation 8 of the Moore and Dyer Independent Report):

- Identify anticipated human settlement locations, areas expected to increase in density of settlement patterns and the timeframes over which this might be expected to occur.
- To ensure an appropriate mix of land uses that provide for housing choices and that enable easy access to employment, commercial, recreational, open space and community facilities.

¹³ See, for example, *Warkworth Mining Limited v Bulga Milbrodale Progress Association Inc.* [2014] NSWCA 105

¹⁴ NSW Government, *The Lower Hunter over the next 20 years, A Discussion Paper* (March 2013)

- Identify future State, regional and local infrastructure needs as well as the timelines, corridors and general locations required for its provision.
- Identify and take into account relevant matters from any current State plan.
- To identify and protect sensitive areas containing (or likely to contain) factors that will limit or prevent development taking place, such as:
 - biodiversity and other ecological constraints
 - significant landscapes or features, including Aboriginal cultural landscapes or sites
 - riparian corridors
 - items or localities of likely or known heritage significance
 - existing land uses that can be expected to place constraints on land use in their vicinity.
- To improve or maintain biodiversity and ecosystem function.
- To improve or maintain catchment health and water quality.
- To ensure the agricultural use of prime crop and pasture land by minimising development which has an adverse and irreversible impact on the land's agricultural potential
- Have regard to expected population changes, including seasonal or temporary population fluctuations whether for tourism or seasonal labour reasons.
- To consider and plan for scientifically anticipated impact of climate change within the footprint of the strategic planning study area and the broad measures required to mitigate its impact.
- To consider and plan for the scientifically anticipated impacts of natural risks such as flooding or bushfire and coastal erosion.
- Identify areas where competing and potentially conflicting land use expectations are likely to arise.
- Identify past and present human activity constraints with broader than localised impacts.
- To consider and minimise the cumulative impacts of anticipated development in the strategic planning area.

We consider that the principles guiding the preparation of the new Central Coast Regional Growth and Infrastructure Plan should adopt similar, outcomes based objectives.

- **Research that will shape our plans**

Page 19 of the Discussion Paper also identifies research that will underpin the development of the Central Coast Regional Growth and Infrastructure Plan. While it identifies, for example, information about housing and employment markets and the feasibility and viability of development in new development areas, it fails to recognise the need for an environmental study.

Best practice strategic and land use planning must be underpinned by scientific, factual and up-to-date data. It is impossible to effectively develop long term strategic plans without a clear understanding of the existing state of the environment and an assessment of the impacts of planned future growth and development on the environment.¹⁵

In particular, strategic environmental assessment aims to provide for a high level of protection of the environment and contributes to the integration of environmental considerations in the preparation and adoption of plans and programs with a view to promoting sustainable development.¹⁶ This outcome is

¹⁵ Our Environment, Our Communities

¹⁶ See for example, Sadler, B. and R. Verheem, 1996, *Strategic Environmental Assessment: Status, Challenges and Future Directions*, Ministry of Housing, Spatial Planning and the Environment, The Netherlands. See also *UNECE Protocol on Strategic Environmental Assessment to the*

achieved through setting minimum requirements for environmental assessment processes alongside plan preparation, including:

- an assessment of the existing state of the environment,
- identification of the likely environmental impacts of the development envisaged in a plan (including cumulative impacts), and the consideration of reasonable alternatives,
- consultation on an environmental report on the plan at the same time as on the plan itself, and
- ongoing monitoring of the significant effects of implementation of the plan.¹⁷

We strongly argue that an environmental study must be carried out prior to the preparation of the Central Coast Regional Growth and Infrastructure Plan, and publically exhibited along with the draft Plan.

- **Other comments:**

- The discussion paper (p16) fails to identify key environmental plans and studies that have already been conducted in the Central Coast region, such as Catchment Action Plans and Regional Conservation Plans. The omission of environmental plans from the list of '*important plans already undertaken*' adds to the impression that the discussion paper is skewed towards planning and development and away from environmental constraints on that development
- We support the conducting of a regional environmental study to accompany the development of the regional plan to address the imbalance between development and environment that exists in the discussion paper.

Chapter 7:

- We support the provision of more and faster commuter trains for the Central Coast.
- The proposed construction of a dedicated freight rail line is also endorsed. The completion of a dedicated freight rail line in SW Sydney has significantly improved the capacity of commuter passenger train services, and a similar effect would be expected on the Central Coast.

Chapter 10:

- The endangered ecological communities (EECs) and threatened plant and animal species mentioned on page 41 provide a starting point in identifying conservation areas of regional significance and protecting them from development. Consideration should be given to incorporating EECs within national park boundaries if this has not already been done.
- There should be more emphasis in the document on climate change risks as a constraint on development. Recent IPCC reports indicate that climate change is already happening and the impacts will worsen as the century progresses¹⁸. If this has not already been done, the State Government has a responsibility to the

Convention on Environmental Impact Assessment in a Transboundary Context (commonly referred to as the SEA Protocol) (available at: http://live.unece.org/env/eia/sea_protocol.html)

¹⁷See also the Hawke report, which makes recommendations as to the framework for strategic assessment, Hawke, A. (2009), "*Report of the Independent Review of the Environment Protection and Biodiversity Conservation Act 1999*", October 2009, see in particular 3.43 – 3.50 .

¹⁸See, for example, <http://www.ipcc.ch/>

community to map areas that will be impacted adversely by climate change and protect them from development via zoned no development areas. This is particularly important for floodplains, low lying coastal areas and high bushfire risk areas.

- We do not agree with the NSW Government's view that best response to a changing climate is to ensure local communities have the best available resources to assess climate risks (p 43). It should not be left to the local community to assess climate risks. There is a role for the State and Federal governments to assess climate risks, and to protect the community from their adverse impacts as much as is possible through planning and other mechanisms. Mapping of high risk areas is an important part of this process.
- We are concerned with the Discussion Paper's heavy reliance on biodiversity offsetting. Biodiversity offsets are not always suitable, as demonstrated in the NSW Land and Environment Court can be a completely unacceptable concept when applied to a critically endangered ecological community.
- The Plan must also address brown sustainability issues such as waste and water management and energy use. Regional sustainability embraces the environmental footprint of development including urban, commercial and industrial areas.

Chapter 11:

- The discussion paper (p44) notes that the CCRGIP will '*identify productive and sustainable agricultural land*'. Identifying these areas of prime agricultural land is a first step, but they need to be protected from inappropriate land use conflicts through supportive zoning mechanisms, including minimum lot sizes.
- In a similar way, securing long term access to safe and reliable drinking water (p44) must be a priority. We submit that all coal seam gas and long wall coal mining activities should be banned in the Central Coast drinking water catchments.

As noted above, we are in support of improved strategic planning processes in NSW. However we are concerned that the current roll out of Regional Growth and Infrastructure Plans is happening outside of a clear legislative framework requiring mandated environmental assessment or public participation. This does not provide a suitable basis for long term strategic planning, including the proper consideration of vital long term issues such as ESD, biodiversity and connectivity, access to green space and infrastructure, climate change and population planning.

It is imperative that the Department of Planning and Environment ensures that ecologically sustainable development is at the heart of regional planning and there mechanisms in place for ensuring that regional plans will deliver necessary environmental and social outcomes, now and in the future.

Should you require any additional information, please do not hesitate to contact Cerin Loane, Policy and Research Coordinator, on (02) 9516 1488 or cloane@nature.org.au.

Yours sincerely,



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