



Wagstaffe to Killcare Community Association Inc.

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14 September, 2012

New Planning System Team
Department of Planning and Infrastructure
GPO Box 39, Sydney 2001
Submitted online @ <http://haveyoursay.nsw.gov.au/newplanningsystem?module=form#tool>

Dear Sir/Madam.

Re: Green Paper Submission

This Association represents 260 residents and property owners of the Bouddi Peninsula, Central Coast.

Firstly, we would like to point out that the existence of the Green Paper has not been well advertised. We submit that we, and more particularly the general public including our members, have been given insufficient time to respond and we request a one month extension of time for public submissions.

We commend the purposes and objectives delineated. Simplicity, certainty, transparency, efficiency, effectiveness, integration and responsiveness are all excellent objectives. We submit however that the prime objective, rather than "sustainable" development, **MUST** be clearly defined as **ECOLOGICALLY SUSTAINABLE** development.

Flowing from this it is both logical and imperative that appropriate environmental protections, including existing SEPP protections are included in all proposed planning instruments.

In addition we submit the following -

- It is concerning that while consideration of social and environmental goals are mentioned in the preamble they have been omitted in the objectives. This omission must be corrected.
- Land economists and social planners should be included in the planning process.
- An extremely important objective is **transparency**. The proposed streamlining and 'deemed approval' of 'partially compliant' development is **NOT** transparent. It is totally unacceptable for approval of non-compliant (partial compliance = non-compliance) development in this opaque manner. Lack of response by Council within the impossibly short time (21 days) provided must result in 'deemed refusal' as it does currently.
- Speed is an important objective however NOT at the expense of quality.
- The provision of a Suburban Character Zone is commended. We request however that the condition for establishment of this zone – "that ... the **whole** community want to preserve" be changed to "that ... the **majority of the** community want to preserve" We do live in a democracy.
- Scenic Protection is not mentioned and must be included.
- Energy Efficiency is not mentioned and must be included.
- Planning and therefore proposed planning instruments must take climate change and precautionary principles into account.

- We are concerned that very few of the recommendation of the Independent panel are mentioned in the Green Paper while there are numerous quotes from developer interests. We request a response to all the recommendations of the Independent Panel.
- Private Certifiers today lack accountability. We reject the recommendation that the role of accredited certifiers be extended UNLESS they can be made significantly more accountable.
- Accreditation requirements for certifiers and environmental consultants should be strengthened and reinforced with significant penalties for providing false and misleading information.
- The Act should provide disincentives and barriers to corruption.
- Merit assessment provisions must include mandated consideration of environmental impacts.
- It is essential that the CEO, Office of Environment & Heritage be included in the proposed CEOs Group.
- The Act and/or Regulations should anticipate the strategies that aggressive and/or unscrupulous developers will employ to subvert the intent of the new planning strategies and instruments.
- We commend the proposed use of expert panels and continued right of appeal to the Land & Environment Court

Thank you for the opportunity to participate. We look forward to a positive outcome for ALL stakeholders.

Yours Sincerely

Dr. Peta Colebatch & Ian Bull
Co-Presidents
Wagstaffe to Killcare Community Association Inc.