COFFS HARBOUR CITY COUNCIL

Additional Submission on the Environmental Impact Statement (EIS) – Coffs Harbour Bypass

Application No. SSI-7666

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The attached feedback is a supplementary document provided as a result of a Coffs Harbour City Council review in response to the *Environmental Impact Statement (EIS)* for the Coffs Harbour Bypass, September 2019.

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Section 3-1 NSW and Australian strategic planning and policy framework, 3.1.10 Coffs Harbour 2030 Plan

These two sections contain references and themes relating to the Coffs Harbour 2030 Plan. The Coffs Harbour 2030 Plan is not a current policy document of Council and has been replaced by the MyCoffs Community Strategic Plan (2017).

The current My Coffs Community Strategic Plan adopted in 2017 is available here: <u>https://www.coffsharbour.nsw.gov.au/Your-Council/Contact-</u> <u>Us/Documents/Corporate%20Planning%20and%20Reporting/MyCoffs%20Community%20S</u> <u>trategic%20Plan.pdf</u>

The previous Coffs Harbour Strategic Plan 2030 that is now archived is available for reference here <u>https://www.coffsharbour.nsw.gov.au/Your-Council/Our-Responsibilities/Pages/Archived-Coffs-Harbour-2030.aspx</u>

Recommendation

Ensure references and policy context throughout the EIS document are from the adopted Coffs Harbour City Council's MyCoffs Community Strategic Plan (2017).

Chapter 14 – Volume 1B Socio-economic

14.1.1 Study Area

The SEIA boundary does not include residential areas and communities such as Boambee East, Toormina and the Northern Beaches. This is of particular relevance when understanding the potential impact on affordable housing and service provision across the Coffs Harbour Local Government Area.

Figure 14-4 indicates areas near to the SEIA boundary that are in the lower decile of disadvantage. Potential impacts on these areas from project should be considered. It is acknowledged that some data and associated analysis is compared to Local Government Level and State level but key service and community areas appear to have been excluded from the broader analysis and impact assessment.

As an example, Figure 14-8 indicated retirement villages outside the SEIA area but do not include any medical centres that are in that area. Figure 14-9 indicates Sawtell Fire Station. These listings indicate the importance and need to expand the SEIA boundary.

Recommendation

SEIA boundary and associated analysis to include additional SA1 areas in order to properly consider social and economic impacts including affordable housing and rentals and services such as health and education.

14.1.1 Baseline Review and 14.2.1 Policy Context

These two sections contain references and themes relating to the Coffs Harbour 2030 Plan. This Plan is not a current policy document of Council and should be replaced by the adopted MyCoffs Community Strategic Plan (2017).

Recommendation

Ensure references and policy context in this section are from the adopted Coffs Harbour City Council's MyCoffs Community Strategic Plan (2017).

14.2.2 Socio-demographic profile

Housing cost and tenure

The EIS project/summary overview notes that the impact of the bypass on affordable housing had been raised by the community. Section 14.2.2 further highlights the issue.

Council has updated the Affordable Housing Discussion Paper in 2019. Some analysis in Section 14.2.2 differs from the data and analysis Council has undertaken. It appears that there is no commentary on how to address or mitigate this impact listed in 14.4.

Recommendation

Include Housing cost and tenure in the 14.3.2 Operational Impacts section and in 14.4 Environmental management measures to mitigate impacts. Review and compare the Council Affordable Housing Discussion Paper (2019).