



**Biodiversity  
Council**

# Submission to Draft plan for the Central Coast's urban growth and environment

19 November 2025

## ***About The Biodiversity Council***

The Biodiversity Council brings together leading experts including Indigenous knowledge holders to promote evidence-based solutions to Australia's biodiversity crisis. The Council was founded by 11 universities with the support of Australian philanthropists.



## Introduction

The Biodiversity Council welcomes the opportunity to provide feedback on the Draft plan for the Central Coast's urban growth and environment.

## Our understanding

The NSW Government is preparing the Central Coast Strategic Conservation Plan (the CCSCP) to provide long-term certainty for biodiversity and development in the Central Coast.

The CCSP outlines:

- the approach to assessing biodiversity values within the CCSP area
- the biodiversity values found during surveys and likely impacts
- steps taken to avoid and minimise impacts
- actions that should be taken to mitigate impacts during development, and associated essential infrastructure projects
- approach to offsetting residual significant impacts on biodiversity values.

Our key concerns are outlined below.

## Key concerns

### 1. Inadequate surveying undermines avoidance

The Central Coast Assessment Report ('Assessment Report') notes that approximately **40%** of the precincts could not be accessed for surveys. The document notes that this "has implications for making robust avoidance decisions and understanding the extent, importance and severity of potential impacts."

One way in which this is proposed to be addressed is to require pre-development surveys for four critically endangered flora species - Wyong Midge Orchid 2 (*Genoplesium branwhiteorum*), Wyong Midge Orchid 1 (*Genoplesium insigne*), Wyong Sun Orchid (*Thelymitra adorata*) and Scrub Turpentine (*Rhodamnia rubescens*) - in areas that have been identified for urban development ('certified urban capable land') but which were not surveyed. If these species are detected planning controls 'will restrict the development in that land'. This provides an incentive for those landholders who have already decided not to cooperate with the survey process to actively degrade sites to ensure that these species are not found.

There are many other threatened species with suitable habitat in the CCSP area for which pre-development surveys will not be required. Of particular concern is Somersby Mintbush (*Prostanthera junonis*). The CCSP notes that "it is endemic to the Central Coast region, occupies restricted habitat and will be impacted by the project". While no individuals were recorded as part of targeted surveys, the consultants note that there are historical records in

the precincts. While the CCSP notes that the majority of these records have been avoided, 76.54 ha of potential habitat occurs in the certified-urban capable land, which represents 2% of the extent of potential habitat for the species. Given that the population is estimated to be 3200 plants, it would be worth knowing if there are additional populations within the potential habitat and if so, to avoid these areas.

**Recommendation 1:** The Biodiversity Council recommends that land that is ‘unsurveyed’ is not classified as ‘certified-urban capable land’. If landholders did not permit surveys to be undertaken the land should be ‘non-certified land’ (i.e. not available for urban development). This would incentivise those landholders to permit access for surveys to ensure that there is a more complete assessment of biodiversity values to inform areas which are identified for urban development, and which should be avoided.

## 2. There is uncertainty about whether mitigation measures will be implemented

The CCSP include the following commitment to mitigation measures:

Indirect and prescribed impacts to relevant biodiversity matters from development in the CCSCP precincts will be mitigated in accordance with guidelines prepared by the Department.

It is not clear what the mitigation requirements will be. The documents list mitigation measures that could be included, but not what precisely is proposed, for what matters and in what locations. For instance, Table 24-2 of the Assessment Report provides ‘examples of standard mitigation measures that are **typically** implemented under the NSW Planning System and **may** be included in the Mitigation Measure Guideline’.

It is not clear if the guidelines will be subject to public consultation. The *Technical factsheet-Mitigation measures* lists ‘potential mitigation measures’ and notes that ‘guidelines will be informed by consultation on the draft CCSCP and finalised as appropriate’.

For the three critically endangered orchids - Wyong Midge Orchid 2, Wyong Midge Orchid 1 and Wyong Sun Orchid - the Assessment Report notes that they are vulnerable to indirect impacts where development is proposed adjacent to or near areas where the species occur. However, it seems to provide significant discretion for developers to determine which mitigation measures to apply:

For development adjacent to key populations, the design measures **will require proponents to consider** the ecological requirements of each species when determining appropriate: boundary management, such as buffers...weed controls...fire regimes...[and] stormwater management.

**Recommendation 2:** The Biodiversity Council recommends that the Mitigation Measures Guideline be subject to public consultation given the lack of clarity about mitigation measures in the Assessment Report and other supporting documents.

3. It is unclear if offsets will compensate for impacts on threatened species and ecosystems

The offset program includes:

- Land-based offsets which will lead to the in-perpetuity protection, management and (where appropriate) restoration of important biodiversity areas.
- Land management programs to complement the broader offset program through restoring habitat or managing landscape threats to ecological communities and species.

The Assessment Report states that “the CCSCP will provide for the protection and management of over 3,900 ha of land as part of the offset program”. The Department of Planning, Housing and Infrastructure’s *A plan for the Central Coast’s urban growth and environment* (the ‘Plan’) notes that four focus areas have been identified to help target the delivery of strategic offsets and four sites belonging to the Darkinjung LALC have been identified as potential ‘early offsets’.

It does not appear that these four sites will fully compensate for residual impacts on threatened species and communities as they total 700 ha (c.f. to the 3,900 ha expected to be protected and managed). The Plan outlines other mechanisms that *may* be used to deliver land-based offsets. Many of these would depend on landholder cooperation. If there are not many willing landholders, then the offset program may not be able to deliver Like-for-Like offsets.

While this program does not depend on credits available through the Biodiversity Conservation Trust (as it focuses on protection and management of land in the Central Coast local government area), it is illustrative to consider the existing reviews relating to the offset market to inform our understanding of what credits may be in short supply. The 2022 NSW Auditor General’s Report into the Effectiveness of the Biodiversity Offsets Scheme found that 90% of demand cannot be met by credit supply and the NSW Independent Pricing and Regulatory Tribunal review into the biodiversity credits market has found that the Biodiversity Conservation Trust has outstanding obligations for credit types that are scarce.

The scarcity of suitable offsets is of particular concern for species that are directly impacted, such as Charmhaven Apple (*Angophora inopina*). The assessment report notes that 54% of confirmed habitat and 1,624 individuals of Charmhaven Apple will be directly impacted. It notes that the CCSCP “commits to the delivery of 13,306 species credits for Charmhaven Apple. This commitment is estimated to provide for the protection and management of around 2,661 ha of land which is confirmed to support the species.” The Biodiversity Conservation Trust’s Credit Supply Register has zero credits listed for Charmhaven Apple. There are several other impacted species that have zero credits listed on the Biodiversity Conservation Trust’s Credit Supply Register, including Giant Dragonfly, Black-eyed Susan

(*Tetratheca juncea*), Heath wrinklewort (*Rutidosia heterogama*), Camfield's Stringybark (*Eucalyptus camfieldii*) and Rough doubletail (*Diuris praecox*).

It is unclear how the offset program will meet the additionality principle; that is, the offset actions are in addition to what would have occurred anyway. This is of particular concern if the offset program focuses on securing land rather than managing it to restore species or ecosystem values.

**Recommendation 3:** The Biodiversity Council recommends that Strategic Assessment release a comprehensive offset strategy outlining:

- the details of confirmed credits or offset sites, including the biodiversity matters they will be offsetting, their location, management details and estimates of gain for each
- a commitment to measuring and tracking gain from offsets and comparing that to losses on a matter by matter basis, and reporting transparently
- the details of outstanding offset obligations and how they will be proposed to be met.

The Biodiversity Council has world-leading experts in offset policy and implementation. There is a high degree of community distrust with offsets in NSW. Biodiversity Council experts are willing to engage further with the Department and provide general guidance on the application of offsets to ensure their robustness in effectively compensating for development impacts matters of significance.