



**EcoNetwork Port Stephens**

PO Box 97  
Nelson Bay NSW 2315

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General Manager  
Port Stephens Council

Via email: [housing@portstephens.nsw.gov.au](mailto:housing@portstephens.nsw.gov.au)

## **Port Stephens Local Housing Strategy**

file number PSC2023-03961-0002

Submission, April 2024

Dear Sir

### **About EcoNetwork Port Stephens:**

EcoNetwork-Port Stephens is a grassroots community-based environmental and sustainability network comprising around 30 community and environment groups and eco-businesses, as well as individual members. We are non-party political and do not donate to political parties.

### **Our position**

Thankyou for the opportunity to comment on the Port Stephens Local Housing Strategy. EcoNetwork Port Stephens supports the detailed submission of the Tomaree Ratepayers and Residents Association (TRRA), for which we add or emphasize the following with respect to environmental considerations.

### **A high -quality natural environment is critical to living and visiting Port Stephens**

The Strategy recognizes, page 7, that

*“The beaches, iconic views, wildlife and our treasured natural environment are major contributors to the regional economy, hosting iconic tourist destinations that attract state, national and international visitors.”*

Furthermore

*“Coastal towns and villages provide diverse visitor experiences and support strong communities that enjoy living in a unique natural environment.”*

Additionally, page 9, that

*“Port Stephens is renowned for its scenic natural beauty, with environmentally and culturally significant areas. Port Stephens attracts residents seeking homes with strong connections to surrounding areas as well as the natural environment, including our beaches, rivers and waterfronts, forests, sand dunes, or the rural hinterland.”*

Clearly therefore, the Housing Strategy recognizes the inextricable integration of the natural environment to the local economy, to visitor desires and satisfaction, and to residents' enjoyment and well-being.

On this foundation, we raise the following in which the Housing Strategy should modify its direction or strengthen its position to safe-guard our irreplaceable natural environment.

### **1. Regarding “Remove barriers to unlock housing supply” ~ Priority 1.2**

Among the range of barriers, the Strategy suggests environmental constraints also have the potential to stall the delivery of housing.

The word ‘constraints’ implies a negative force. Given the importance of the natural environment to the integrity and character of Port Stephens, the essence of Port Stephens economy and visitor and residents well-being, and is the ‘tree-change’ described in the Strategy’s vision, there’s a need to shift how the Strategy communicates about the natural environment.

The word ‘constraints’ could more appropriately be presented as ‘safe-guards’, so that the environment is perceived in the Strategy as a critical element to the integrity of Port Stephens, and hence an essential component to retain and enhance.

The ‘environmental constraints’ (p22), reworded to ‘environmental safe-guards’, are, as TRRA has recognized, both necessary and desirable to properly assess and safe-guard our environment.

In safe-guarding our environment, EcoNetwork Port Stephens differs to the TRRA submission, p5, as we believe there are other mechanisms to increase housing than those related to clearing native vegetation, vegetated wildlife corridors, or areas zoned for public recreation.

Port Stephens has lost so much natural habitat that many species are threatened, while those not yet classified as threatened, may be perilously close, and further habitat fragmentation and/or loss may be the tipping point.

### **2. Regarding “Increase the proportion of infill housing” ~ Priority 1.3**

EcoNetwork is in favour of infill housing, particularly to reduce impacts of greenfield developments and urban sprawl with the consequent loss of our environmental and rural amenity.

In densifying our ‘towns’, we need to consider several environmental parameters:

- a/ *Ensure a planned strategic approach to multistorey buildings so that the essential character of our towns and villages is not lost.*

Visitors and residents come to Port Stephens for its natural environment, and that is just as much about living and being in a green environment as it is about the opportunities the marine and national parks provide. A town such as Nelson Bay is backed by green hills, and though walking in suburban streets, the hills are a constant reminder we are nestled in a green scape (see b/ below). These features should never be lost which is a danger if there are multiple 7+ storey builds. The shorter term gain for increased housing should not be at the expense of the longer term livability and our economic basis.

- b/ *Recognize the visual value of our ridgelines and green scapes, viewed from land and water, to our economy and well-being, and to Worimi Country.*

From both land and water, looking around the Port Stephens estuary, the Karuah River valley, both north and south of the estuary, nearly all the hilltops or ranges are green and without intrusive builds, other than a blip in Corlette, Soldiers Point and to some extent Shoal Bay. And in many areas this green extends to the shoreline. This is quite unique in such an extensive area with so much urbanization, and is an important part of the region's character.

Far from creating intrusive builds for short term gain, Council and community should look to the long term and advocate to have the green ridgelines formally recognised as important [Cultural Landscapes](#). This could be facilitated, for instance, with alignment to the [ICOMOS Charter for Places of Cultural Significance \(The Burra Charter\) in Australia](#) and the [National Scientific Committee on Cultural Landscapes and Cultural Routes](#).

As the Koala Coalition (KKEPS) describes in their submission ... *the ancient sand dune that now forms the ridgeline from Boat Harbour and along the north of the Anna Bay village is the songline of the Worimi Maiangal clan and unrecorded heritage items will still be in situ along it, as well as it forming a wildlife corridor that should be protected from urban sprawl.* These should remain in public ownership aligned under the ICOMOS Burra Charter.

- c/ *Recognize the visual value of our rural landscapes as important parts of Port Stephens heritage, avoiding greenfield developments*

Our western areas of Woodville and Wallalong, for instance, present a rural landscape that demonstrates rural enterprises and part of our cultural landscape close to coastal localities. Such landscapes are fast being lost and with it our collective understanding and appreciation of our settlement history and our links and needs for farming. Again, consideration needs to be given to ensuring there is a strategic approach to protecting rural landscapes in our hinterland under the ICOMOS Burra Charter.

*d/ Retain and enhance all possible opportunities for greening our townships and associated residential areas*

As areas are densified, there's a consequent loss of green space, particularly around houses, as more trees and shrubbery are removed as building sizes increase relative to the occupying land area. Consequently there's loss of opportunity for native birds, bees, butterflies, bugs, beetles and all sorts of wildlife. Our urban gardens help support our increasingly fragmented environment, contributing some linkages between reserves as conduits for wildlife movement and gene flow, but trees and gardens are disappearing.

Port Stephens has many connecting pathways and small corridors around urban areas that are essentially weed wastelands. Suitable planting would hugely enhance their environmental, aesthetic and climate mitigation value.

Action 4.3 in part recognizes this need above, but could be broadened to include 'planting for wildlife value'. Furthermore Action 4.3 timeframe should be designated Short term for investigating the strategies and policies, as the benefits are required now to enhance the environmental and human well-being and address an aspect of climate change impacts. Implementation of the strategies should then be Short-medium term. These actions if implemented now, will take medium to long-term to reach their potential.

*e/ Retain strategic vegetated landscapes enhancing wildlife corridors*

Currently there seems no approved and public strategy which identifies contemporary corridors of biodiversity values for koalas and other wildlife, which specifically link nature reserves to allow for movement and gene flow of fauna, as well as flora.

The Port Stephens Critical Koala Plan of Management (CKPoM) considers valuable koala habitat though not the linking corridors. These corridors are critical to enable suitable housing development that will not impact on Port Stephens future environmental linkages.

For instance, Ingenia's lifestyle development, Natura, has compromised koala movement between the Tomaree and Tilligerry peninsulas. Fortunately community lobbying retained some critical trees and other features to facilitate minimal movement. Such linkages should be identified in Council strategic planning documents, facilitating not only koala movements and gene flow but other wildlife also between parks and reserves.

An additional Action 4.4 of this Housing Strategy should include strategic identification of wildlife corridors, with a range of habitat types and values, connecting parks and reserves across the Port Stephens LGA, and beyond, to increase wildlife movement. These should also be considered in relation to the mapped [Barrington to Hawkesbury Climate Corridors](#).

### **3. Regarding affordable and diverse housing choices (Outcomes 2 & 3)**

*a/ Promote sustainable, low impact, accessible and well-designed builds, incentivizing development of environmental hubs*

In considering housing style, the Strategy should encourage sustainable, low impact builds with accessible features and quality design. EcoNetwork supports TRRA (submission p6) in its call to include “reference to the Government Architect’s Guidelines on design standards that would reduce resident (and in particular renter) vulnerabilities through a range of measures such as solar access, thermal control, access to greenspace etc. Council can and should do more to positively influence future housing quality as an important component of the overall housing strategy. “

Council could incentivise developers to provide builds demonstrating far-reaching environmental values, whether green walls, solar walls, rooftop gardens under solar sun shades, (bladeless) wind power generators, community power opportunities and so much more. Port Stephens could demonstrate environmental hubs that complement our green ‘Incredible by Nature’ promotion.

*b/ Provide safe cycle and walkways, where possible as separate facilities*

Accompanying affordable and diverse housing is the need for support facilities, including improved transport and cycling pathways which the Housing Strategy recognizes.

Road cycling is unsafe without dedicated cycle lanes and significant suitable road shoulders.

The Housing Strategy should recognize that to assist people to avoid using cars over small distances, safe pathways need to be provided. Many roads have no pathway on either side, with walkers, pushers, elderly sometimes forced onto the edge of roads.

Currently cycling and walking paths are frequently shared facilities, along with perambulators, toddlers, elderly people, dogs, skaters and so forth. Cyclists on these pathways, who generally are the minor user, are a hazard to the diverse walking uses. Shared pathways for people commuting to work will be unsatisfactory as time, therefore speed is critical, and speed is not safe on shared pathways.

Where shared pathways exist, cycle speeds should be limited for safety of all users, and suitable cycleways provided on roads for speed commuting.

#### **4. Regarding some specific sites in the Housing Supply Plan**

##### *Salamander area*

The pink area south of Salamander Way is core koala habitat with swamp mahogonys and is inappropriate for housing. We are advised this land is mapped in the CKPoM. The bushland is adjacent to a critical corridor of predominately Environmental Conservation (E2) land, linking Tomaree National Park with Mambo Wanda Wetlands and the Tilligerry Nature Reserve. This land in question provides quality food trees while the corridor with some food trees, is mainly habitat trees enabling movement across the peninsula between reserves.

Shop top apartment development seems an excellent way to provide accommodation without environmental harm, especially if there's inclusion of roof top gardens and features that enhance an otherwise harsher environment. We note that development it proposed in the vicinity of the Mambo Wetlands and as such, the DAs should be thoroughly scrutinized given the sensitivity of this area.

There are other areas mapped across the Housing Supply Plan which are not clearly identifiable. Consequently the Strategy and Plan should not consider lack of comment as approval of those areas, simply that the mapping is not adequate for clear identification and comment.

#### **5. Regarding apartment development**

The Housing Strategy proposes a significant amount of the infill as apartments, especially in the tourist areas of Nelson Bay and Shoal Bay. There is a current stock of apartments, and housing, available either as tourist accommodation or as holiday homes for people residing elsewhere, and are empty for much of the year.

For the Housing Strategy to be effective, consideration will be required as to how the style of apartments are built to facilitate residential use rather than tourist or holiday use, and homes are not snapped up as holiday homes, otherwise the plan is self-defeating and the target users miss out. This is a major challenge which the Strategy does not seem to address!

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**In summary,** EcoNetwork Port Stephens promotes that the natural environment should be safe-guarded and enhanced to maintain and celebrate the essence of what attracts people to live and visit the area.

Short-term gains should not be prioritized over long-term benefits for future generations. Once natural areas are lost they can never be regained.

The natural environment is the basis for the economy of the area, and is critical to the success of the Housing Strategy.

EcoNetwork has no objection to this submission being made public in full and unredacted.

We look forward to your support

Yours sincerely

Secretary  
EcoNetwork Port Stephens Inc.

[secretary@econetworkps.org](mailto:secretary@econetworkps.org)  
<http://www.econetworkps.org>