



17 February 2016

Draft Central Coast Regional Plan  
GPO Box 1148, Newcastle NSW 2250.

Attention: Plan Review Officer

Before I address the specific areas of the plan, there are some overall comments that I believe are warranted.

1. The glaring omission across the whole plan is a lack of recognition of the danger to the Central Coast water supply posed by the proposed Wallarah 2 coal mine. I believe that this "Sword of Damocles" problem must be resolved before any concrete plans are put in place. The fact is that without a guaranteed water supply, the population and industry growth ideas put forward in the plan cannot hope to be realised. Wallarah 2 puts at risk 50% of the Central Coast water supply.  
In the event that Wallarah 2 mine damaged the Central Coast water supply, additional dam and pipeline capacity would be required from Hunter Water, to meet our needs. This would cost in the vicinity of \$300 million, based on the estimated cost of the abandoned plan for Tillegra Dam.
2. In the briefing discussions I attended with The Community Environment Network, it was revealed that the Draft Central Coast Regional Plan has been developed without any consideration being given to the potential impact of the proposed merger of the Wyong and Gosford Councils. I believe that the draft plan should not be finalized until the merger has received Parliamentary approval and the impacts of the merger are examined and understood. I believe the matter of Governance of the Central Coast region is no small matter, and it is essential that shape of the Local Government implementing body is properly understood and recognised, for the Plan to be effectively implemented.
3. The statistical basis for The Draft Plan is out of date. The Australian Bureau of Statistics has scheduled a national census for August 2016. I believe the results of this new Census should be used to underpin the plan's population assumptions. As it stands The Draft Plan appears to be predicated on a growth in the retired / aged sector, with little thought being given to growth in the number of young families. By ignoring this latter aspect, the plan is in danger of not providing sufficient schools, teachers and relevant services to meet the needs of this demographic. The new Warnervale town and its surrounding residential area will be predominantly populated by young families. The education infrastructure must be built to cater for this need and in other residential growth areas. The private education sector in the Warnervale area is almost at capacity, and with the lower average incomes of the region, has limited scope for absorption of large numbers of pupils.
4. Passing reference only is given to the educational needs of the region. The running down of the TAFE system by State and Federal Governments is totally ignored. The University of Newcastle has recently released data on the skill levels of the current workforce and projections on the job types and numbers that will disappear over the time frame of this plan. The University report needs to be studied and its findings incorporated into a comprehensive plan to address this looming problem and to provide reskilling of the workforce.

The facts are that currently an above state and national average proportion of the workforce employed on the Central Coast carries a trade qualification. At a time when TAFE is being run down, there are insufficient tradespeople available now to meet the current housing demands let alone those projected in the plan. There must be action to reverse the decline in TAFE – and not via questionable private providers – to provide the number of skilled trades' people to meet the projected demand of today's industries and the new technology industries.

The University sector is similarly ignored – other than by a passing reference to something that might happen in the Warnervale business and industrial park zone as part of Wyong council's vague concept plans, which are reported to include an international university. On a comparative basis of population, there is justification for the upgrade of Ourimbah Campus of Newcastle University to a full standalone university and plans for this to happen should be in the Draft Plan. See University of Otago, New Zealand for a realistic comparison with a region of comparable size to The Central Coast.

5. Employment projections in the plan place an over emphasis on retail. This ignores the fact of the high unemployment levels of the region and its below average incomes. This means there is limited capacity beyond the daily essentials for discretionary retail spending, which is where retail employment growth would be likely to come from.

There is an expectation of strong growth in aged services as an employer – typically a high entry cost sector for users, that delivers on the lower end of the wages spectrum – reinforcing the folly of overreliance on these two sectors for strong employment growth.

The draft plan assumes continuance of the Central Coast continuing into the future as a dormitory suburb of Sydney and Newcastle, from which large numbers of workers will always commute on a daily basis.

The plan makes no attempt to determine the industries that could be enticed to relocate or establish operations on the central coast. There appears to be no attempt to define where the current 30,000 plus daily commuters are employed, in Sydney and Newcastle, nor the industries in which they are employed.

Providing incentives for industry to relocate to the central coast will take pressure off the M1 and rail systems and will help to grow the local economy. In the absence of such incentives, there is no plan to dramatically improve the road and rail capacity to and from the Central Coast, to facilitate the daily commute of those for whom the plan offers no hope of appropriate, highly skilled Central Coast employment opportunities.

In the following pages I have addressed specific sections of the Draft Plan in the order in which they appear in the document. In preparing my comments I have cut and pasted sections from the original draft plan and followed with my comments. In this process I encountered some unresolved formatting issues for which I seek your understanding, as they do not detract from the relevance of my comments.

## **Developing the draft Plan**

*The document states: A comprehensive evidence-base also underpins the draft Plan. This includes data and projections on population, housing, employment and transport. Important environmental and natural resource values have also been considered.*

What work was done to establish the upper and lower capacity limits of the current water supply and the population and industrial base that can be supported by this finite resource?

Has consideration been given to the possible need to increase the water supply capacity to meet the needs of the growth envisaged in the draft plan?

**VISION.** *In this section it states that Gosford's potential.....will be realised by ...A flexible regulatory environment.*

Do we take this to mean that there will be a further erosion of the planning controls, such as we have seen this year, to facilitate the construction of mini sky scrapers?

This section goes on to state that the economy will be strengthened through the capacity of extractive resources, including sand and stone. The report ignores the fact that Rocla's sand mining expansion plans have been stopped by the Land and Environment court. Where will the growth come from now?

**INFRASTRUCTURE FOR THE REGION'S GROWTH.** *This section talks about catalyst projects required to deliver the region's growth.*

What are these "catalyst projects" that are going to be monitored – are they real? What is the time plan for their implementation?. Without some commitment detail, this statement has little other than the ring of a philosophical ideal about it.

## **GOAL 1 ENHANCE COMMUNITY LIFESTYLES AND ACCELERATE HOUSING SUPPLY**

### **ACTION 1.1.1 Protect scenic amenity and character**

*The NSW Government will: support local initiatives to protect the scenic values, amenity and character of local areas.*

Will this support include oversight of developer plans that go outside the existing LEP's, so that community concerns are actually listened to and not just given lip service?

What action is proposed to curb the current abuse of the "Gateway approval" system?

### **ACTION 1.1.2: Plan for integrated and well-connected open space, sporting and recreation opportunities**

*These facilities provide a focus for community activity and interaction and can support urban renewal in their surrounding areas.*

**What does this statement really mean?? How will this be achieved in practice.**

*The NSW Government will:*

*Support councils to develop open space and recreation strategies which:*

*Identify a range of accessible open space and recreation opportunities;*

*Integrate open space and recreation networks; and*

*Improve public foreshore access.*

**There is no mention of plans to preserve existing natural bushland and beach environments, which are core to the quality of life sought by central coast residents.**

### **ACTION 1.1.3 Investigate opportunities to grow and better connect walking and cycling transport networks**

*Integrating the recreational walking and cycling networks with commuter connections to centres, bus networks and railway stations will help to increase commuter walking and cycling and support the public transport network.*

#### **What does this statement really mean in a practical sense?**

*The NSW Government will work with councils to: Prioritise links to create a connected network that: maximises use of the bushland and foreshores available*

I am concerned that this network will result in a substantial environmental damage. We have already seen the approval of the Magenta to Noraville cycle pathway through the Wyrabalong National Park, when an alternative route along an existing easement was available and could have been implemented at a substantially lower cost than the work now being undertaken. A lineal stretch of some hectares at the edge of the national park is now being destroyed and the national park to the west of the cycle path is under threat from incursions into the park by cyclists and their rubbish. There is little enough natural bushland east of the M1 Motorway and Foreshores in the urban areas now, without what is left being degraded and lost, when viable alternatives are available.

### **ACTION 1.1.4: Prepare guidelines for a safe, inclusive, healthy and enjoyable built environment**

*The NSW Government will: Work with the NSW Healthy Planning expert Working Group and councils to develop guidelines for planning, designing and developing a healthy and safe built environment.*

LEP changes will be required to make this happen. At present Gosford and Wyong have conflicting LEP's. As a result of the proposed councils merger a new *Central Coast LEP* will be required, and this should go through the full community consultation process so that the flaws in the two existing LEP's can be removed.

This shows again how important it is to have all the aspects of the merged councils bedded down before the final regional plan is released.

### **ACTION 1.3.1 Facilitate accessible centres and communities**

It seems that the plan is in part focused on making it easier for residents to go to jobs in Sydney / Newcastle rather than being focused on plans to move those business types, that people now work in, to the Central Coast.

Seems the philosophy in part appears to be "create good transport infrastructure and industry will follow". What is the empirical evidence, as opposed to planning philosophy, from anywhere in New South Wales for this actually happening?

### **DIRECTION 1.4 Accelerate housing supply**

*The types of housing identified by the Urban Feasibility model as most viable were residential flat buildings in Gosford Local Government area and multi-dwelling housing in both Gosford and Wyong Local Government areas.*

What form of Multi Dwelling Housing is envisaged - it can't mean residential flats, as this has already been identified in the above paragraph. Is this more boarding houses such as the one rejected for Ettalong Beach by The Land & Environment Court? And is it more so called affordable

homes, which in effect are relocatable homes in pseudo caravan park environments?. Wyong already has an imbalance in both of these types of housing / accommodation and residents have made it clear on many occasions that they do not want any more in the housing mix.

*Consultation with the development industry has identified infrastructure servicing, charges and biodiversity approvals are affecting housing delivery in the Warnervale – Wadalba land release area. The draft Plan proposes specific actions to improve the infrastructure contributions framework, the coordination of infrastructure and land release staging, and the approach to offsetting the biodiversity impacts of new development.*

**WHAT ACTIONS ARE PROPOSED?** There is nothing that I can see in the draft plan that details the specific actions referred to above. What is implied is a watering down of the current biodiversity approvals process and THE continuing corruption of the offsetting laws to suit the wishes of the Developer industry.

The principles of Ecologically Sustainable Development (ESD) appear to be disregarded by the above statements along with the principle of “like for like in the same area” when it comes to offsets. The commitment to ESD earlier in the draft plan now appear to be lacking in real commitment and substance.

## **DIRECTION 1.6 Concentrate new development at Warnervale and elsewhere in North Wyong**

*The Structure Plan also identifies several strategic locations subject to a range of physical characteristics (for example, high biodiversity values, and clay and coal resources) that require more detailed local planning to determine development potential. This more detailed planning is yet to occur and will need to consider several development and biodiversity offset proposals for this area, if approved.*

In looking at this, the impact on water resources, air quality, the natural environment and the possibility of mine subsidence must be considered. A full EIS for the area must be undertaken by an organisation totally independent of councils and government. The current practice of allowing developers to present their jaundiced EIS reports has to be stopped if development proposals are to have any credibility with residents.

The proposed WARNERVALE LINK ROAD, and the associated industrial / commercial developments proposed to follow its completion, will have a substantial impact on PORTER'S CREEK WETLAND.

Porters Creek Wetland is the largest remaining freshwater wetland on the NSW Central Coast. Water flowing from its upper catchment is filtered by the swamp forest communities of the wetland before flowing into the Wyong River and Tuggerah Lake.

PORTER'S CREEK WETLAND is a State recognised environmental hot spot containing significant flora and fauna. I recommend that the reports, (readily available from Wyong Council and The Department of Environment), relating to this important wetland be thoroughly studied and understood, before any final plans are allowed for the WARNERVALE LINK ROAD and industrial development of this part of Wyong Shire.

### **ACTION 1.6.1 Maintain up- to-date staging for new land release in North Wyong**

*Where possible, updates will provide additional guidance on areas identified as 'Strategically located, constrained sites subject to further investigation and offset strategies to define conservation requirements and development potential'.  
Not where possible – it's a fundamental need for all the land in the area!*

*These areas have clay and coal resources, areas of 'high environmental value' and contain key components of the potential green corridor areas and habitat networks in the Structure Plan (see action 1.6.2 below).*

*Resolution of these local issues could occur on a site-by-site basis, as areas are rezoned for urban development, or as part of a coordinated planning process for a larger area.*

**There is no way that a site by site basis should be considered. This is just the sort of approach that feeds into the developer's models, knocking off one piece of the environment at a time.**

**It is an absolute must that the whole of the area must be considered at the same time! The piecemeal approach is little short of environmental vandalism and is unacceptable.**

*Review the North Wyong Shire Structure plan to reflect the latest planning information regarding biodiversity, resources, development and infrastructure, and, where possible, provide greater certainty about issues associated with strategic sites.*

**Again this is an absolute must. The Wallarah 2 coal mine decision must be #1 priority in this review or earlier as mentioned in my opening comments.**

**Also – a decision on Wyong shire council's request to rescind the Warnervale airport act and the future of the airport must be made. Already the council is in breach of the act through its extension of the current runway beyond what is allowable.**

### **ACTION 1.6.2 secure regional wildlife corridors and offset the biodiversity impacts of new development.**

*Work with councils to identify opportunities to establish and manage landscape and biodiversity conservation corridors.*

There must be a total change of attitude by Councils on this. Past actions have shown little regard by Councils for the environment and a total obeisance to the developer lobby and their interests. Parts of wildlife corridors are being passed over to developers and spot re-zonings of Environmental land to allow housing and industrial development, have become the norm in the terms of the current councils. Councils must be required to consider existing wildlife and conservation mapping to stop further loss of the region's biodiversity and conservation corridors.

## **Goal 2-growand diversify the regional economy.**

In my opening comments – section 5 – I observed “The plan makes no attempt to determine the industries that might be enticed to relocate to, or establish operations on the central coast.”

Whilst I strongly support growing and diversifying the regional economy, there is nothing in the plan that suggests the authors have anything other than a philosophical commitment for this to happen.

There is again a continuing reliance on the Aged Care, Health and Retail sectors plus the inclusion of electricity generation, construction and tourism as growth areas. I have dealt with retail and aged care in previous comments.

The **electricity generation** industry is in serious decline in the region, with the sale of some power stations and the closing of others. The sad fact is coal powered generation is in the process of being phased out.

There is nothing in the draft plan about replacing the old generating capacity with renewables.

How do the authors of this plan perceive the electricity generation industry turning around from a shrinking employer to a growth employer?

**Tourism** is seasonal, with little apparent commitment from those involved, (I hesitate to say engaged) in the industry, to meet the needs of other than the peak holiday markets. The Central Coast Tourism Authority lacks cogent direction, partly due I believe to the constant turnover of its senior staff.

For this industry to become a dynamic employment generator and economic force, a major investment is required in research and industry commitment to a plan that will see Tourism reach its full potential. Central coast tourism authority appears to lack the technical capacity and industry knowledge to develop a long term plan that current and potential tourism operators can sign up to.

The supporting infrastructure, viz. an integrated public transport system, a modern usable road system (central coast highway is a bottleneck and is subject to flooding) and modern reasonably priced hotels and visitor attractions are well overdue for major improvement.

None of these factors are addressed in the plan. Just saying Tourism is a growth potential industry won't make anything happen. There has to be a plan structure, based on quantified goals, developed from credible industry research.

**Construction** employment growth is dependent on the appropriate release of **serviced land** for industry and housing. It also relies on a skilled work force. Neither of these factors is being adequately addressed in the draft plan. TAFE is in decline and land release appears to be a low priority, for both Government and Councils – despite utterances to the contrary.

So I have to ask – just what are the quantifiable plans for economic diversification?? What new industries and new technologies are being envisaged to make the much desired diversification a fact?

In all the discussion on Industry, I have not found one mention of the current NBN rollout and the potential impact it could have on the region.

### **ACTION 2.1.2 support the business development needs of industry**

*The plan states: Activity which occurs outside of centres, including tourism and agriculture, will require a regionally-consistent response to planning, and consideration about how these uses occur and relate to other land uses in their local areas.*

To facilitate agricultural production and food manufacturing, a NSW Government policy is needed that will reverse the current alienation of agricultural land for hobby farms and housing / industrial development. Considerable unused industrial land capacity exists on the Central Coast, with current estimates suggesting no additional industrial land will be required for several decades.

A larger LOCAL fresh food production industry, which currently contributes \$1.5 billion to the national economy, and a strong LOCAL food manufacturing sector will have the benefit of reducing the cost of getting fresh produce and food manufactures to the Sydney market. The overall environmental benefit of this to the State is significant.

### **ACTION 2.1.3 Manage and monitor land supply to enable a flexible and responsive planning environment for business and industry**

*The NSW Government will:*

- *work with councils on changes to local environmental plans and local strategies to respond to changing demands for land and floor space.*

The plan acknowledges that there is a significant oversupply of zoned industrial land. There is **no need to encroach further on the environmental lands** of the central coast for commercial development. This aspect of business location planning has to be closely monitored, else one of the major attractors for living on the central coast will quickly disappear.

### **ACTION 2.1.4 Coordinate infrastructure delivery to meet changes in demand for industrial land**

*The region's supply of zoned and serviced industrial land is not sufficient to support growth over the medium term*

What you are saying here in 2.1.4 directly contradicts what is said in 2.1.3. The point to make here surely is that the **services** for the already zoned industrial land **are missing?**

### **ACTION 2.1.5 support other employment development areas and opportunities**

*The Plan states: The combined University of Newcastle Central Coast and TAFE campus at Ourimbah; Wyong Hospital, large tourism activities, and infrastructure such as waste disposal sites and power stations could support expanded or complementary land uses.*

**This statement needs much clarification with specifics. As it stands it is pretty meaningless.**

### **ACTION 2.3.1 support integrated planning for the Gosford City Centre and the Gosford Hospital health and wellbeing, waterfront, and arts and entertainment precincts to grow jobs**

*The Our City, Our Destiny Masterplan identifies opportunities to redevelop five precincts within the Gosford city centre:*

Recent events have overtaken the masterplan, with the advent of the proposed tax building on the Gosford waterfront and no real plans for the development of the performing arts centre in the Gosford CBD precinct. This whole aspect of the regional plan needs a disciplined approach and credible update, as proposals for the area are now changing on a near daily basis, creating uncertainty through confusion.

### **DIRECTION 2.5 Focus growth within the Tuggerah to Warnervale Corridor**

*Wyong Shire Council is planning for the centres of Tuggerah and Wyong to operate as a complementary centre, connected by the Tuggerah Straight and the **Central Coast Wetlands and Pioneer Dairy site.***

Whilst the plan is credible in stating that the Tuggerah Straight (Pacific Highway) will be a light industry growth area, the statement about Central Coast Wetlands, Pioneer Dairy is pure rubbish! This area is a swamp with no connections relating to the prior sentence. The recent attempt by Wyong Council to rezone this environmental site to recreational was rejected by all NSW Government agencies.

Inclusion of statements such as that above lends little credibility to the expectation of rigorous underlying research that should have gone into the development of this draft plan.

### **DIRECTION 3.2 Manage rural lifestyles sustainably.**

Wyong Council has a current policy of no residential development west of the M1 Pacific Motorway. Developers constantly seek to overturn this policy via a range of rezoning and development proposals. The policy must be enshrined in the central coast regional plan, to protect the life style choice of residents and farming operations west of the M1 Pacific Motorway.

### **DIRECTION 4.1 Protect and manage the region's environmental and heritage values**

No mention is made of the Gosford LGA Community Open Space Lands, generally referred to as the COS Lands. These environmental lands are in need of focused protection, through rezoning to E2, Environmental Conservation. Without this rezoning, residents will continue to be faced with needless & constant battles to protect this land from developer interests. The environmental lands across both Gosford and Wyong are the very reason many people come to live in the area. Destruction of this bushland would run contrary to the lifestyle hopes and enjoyment of most in the community.

Across the Central Coast there are many areas of environmental and local (indigenous and western) cultural significance. It is essential that the draft plan includes specific proposals to ensure that the region's environmental and heritage values are **in fact** protected.

**ACTION: 4.3.1 Apply contemporary risk-management to coastal, man-made and other hazards**

*Require that councils review and update their floodplain risk and coastal management plans, particularly where growth is being considered that may be affected by natural hazards.*

This review and update must be based on the latest Federal Government and International climate science. There is a need for the requirements of this review to be fleshed out in the plan, taking into consideration the conflicting attitudes on the existence of flood risk by Gosford and Wyong councils, which as you know, are proposed to be merged.

Currently a multi NSW Government department and Wyong Council review is being undertaken of the flood risks and flood effects, relating to the Tuggerah Straight Industrial area. This review is the first ever to involve all the relevant stakeholders and has the potential to determine a long term solution to the fact of increased flooding in the area. The review's findings should be allowed for in determining appropriate risk management practice for this area of The Central Coast.

Thank you for considering my comments.