
Subject:

FW: Response to Draft Central Coast Regional Plan

Attachments:

Submission on the Draft Central Coast Regional Plan.doc

Response to Draft Central Coast Regional Plan

I am disappointed at the Plan. It appears to me to be simply a template where some local facts have been inserted. The Department should hang its head in shame. So many words demonstrating such little understanding of the constraints of the region and what might be appropriate for it in the future.

I was going to prepare a detailed response, but I can't find the enthusiasm for the task given my opening statement.

So I have decided to essentially rely on my submission to the Discussion Paper, which I have simply rebadged. It is as relevant to the Draft Plan as it was to the former document. I would say though that the proposal to infill housing through West Gosford to Erina is thwart with problems. This will irrefutably exacerbate the traffic flow problem that has already emerged. The recently completed interchange at West Gosford costing \$174 million will not cope with the increased traffic volume. Is the Government prepared to throw more again at this problem or perhaps plan to avoid this from happening?

It makes sense, as I suggest in the attachment, to prepare a bottom up, information-based approach, identifying the strengths, weaknesses and real needs of the region and to plan around them.

23 March 2016

Submission on the Draft Central Coast Regional Plan

Executive Summary

The Discussion Paper *Your Future Central Coast 2031* is blinkered, lacking in vision for both sustainability and future jobs growth where they are needed. It appears to be little more than local tweaking with a few selected statistics, of a template used for each of the ten 'city shaper' Regional Plans in areas of strategic importance to support Sydney's future growth and change.

It is premised on the notion that the Central Coast population is expected to rise by a preconceived number that, actually, the NSW Government can't seem to agree on (see the expected numbers of new residents quoted in the CC Regional Action Plan, 2012¹ (100,000) and the present Discussion Paper, 2014² (64,250)), and that these new residents will need homes and jobs. This is an intellectually lazy exercise and shows no understanding of the challenges and limitations to development in the region being planned for.

The Central Coast Regional Growth & Infrastructure Plan must reflect sustainable growth, whilst delivering support for Sydney.

For this reason, a new bottom up, information-based approach, is proposed for the development of a Central Coast Regional Growth & Infrastructure Plan to 2031.

The outcomes of this approach will have credibility with the regional community by:

- providing jobs as a priority, for current residents employed out of the region, thus alleviating pressure on Sydney roads and rail services and on local regional transport infrastructure,
- identifying only those areas that are suitable for new residential development,
- identifying and protecting areas of high conservation value from development,
- creating a new Planning Instrument for Agricultural Production on the Central Coast Plateau that will make use of the existing land zoned Rural 1a Agriculture for agricultural production to meet the needs of the Sydney population and protect the CCP from all new extractive industry development, and
- on the basis of these criteria, setting a sustainable population growth limit to 2031 for the Central Coast.

¹ https://www.nsw.gov.au/sites/default/files/regions/regional_action_plan-central-coast_1.pdf

² <http://www.haveyoursay.nsw.gov.au/assets/Uploads/Central-Coast-Discussion-Paper.pdf>

Submission on the Discussion Paper

In providing a response to the Discussion Paper, I would like to address some specific issues. In so doing firstly I would like to say that I have resided in Gosford LGA since 1976, a period more than twice the time between now and 2031. In that time unrestrained population growth has occurred resulting in a number of changes to the area, but in part at great cost. Despite its proximity to Sydney, its attractive environment and lifestyle and a perception of a cost of living advantage over Sydney, there are a number of fundamental problems, consideration of which undermine the wisdom of uncontrolled population growth. However, the region has some identifiable advantages that have been overlooked for the main part. I will address the good and the bad.

In framing my comments I note that *Your Future Central Coast 2031* is a precursor to a Regional Growth and Infrastructure Plan for the Central Coast (CCRGIP), one of a number that are identified as ten 'city shapers' in areas of strategic importance for Sydney's growth and change and supporting *The Metropolitan Strategy for Sydney to 2031*.

The Central Coast is identified as the ninth largest urban region in Australia. This should confer some serious respect for community views about the problems and how to approach the task of constructing a satisfactory CCRGIP. These are the people who best know the area and have a considered view on what kind of balance they would like to see in any future development in the region.

As it stands, the Discussion Paper is approaching the task from the wrong direction. While the community is being 'consulted' it is only to respond to someone else's preconceived views on what growth is to be expected for the region and even this can't be agreed upon by the NSW Government (see Section 1 **Population Increase on the Central Coast to 2031 and its impacts on housing and roads** on p3 in this document).

I would make another observation about the Discussion Paper. In December 2012 the NSW Government released a number of regional action plans, including one for the Central Coast¹, as a 'new approach to deliver integrated strategic planning for land use, transport and infrastructure investment.....and is committed to partnering with communities....to improve social and economic outcomes. In this plan, long term strategies will align to NSW 2021², the NSW Government's 10 year business plan'.

All of these words and phrases seem vaguely familiar as I browse through the present Discussion Paper. I have to admit to being somewhat perplexed about the relationship between all of these various and somewhat contradictory documents; and also whether any of it means anything at all.

Will we see concrete outcomes in the final CCRGIP that have commitment, timelines and budgetary allocation, or merely a wish list of general statements and grand claims that will fade over time and be superseded by or repeated in the next government planning review for the region and State?

¹ see URL in footnote on p1

² <http://www.nsw.gov.au/2021>

As a precursor to a presentation of recommendations at the end of this document, I would like to comment on the following key issues.

1. Population Increase on the Central Coast to 2031 and its impact on housing and roads

We are repeatedly told in the Discussion Paper to expect population growth on the Central Coast of 64,250 requiring 36,800 new dwellings by 2031. I would draw your attention to the fact that this is at odds with the estimate of 100,000 new residents for the Central Coast region by 2031 quoted in the Central Coast Regional Action Plan (CCRAP) released by the NSW Government as recently as December 2012¹. It makes me wonder just how those responsible for these figures arrive at them. Irrespective of this anomaly, one third of these are expected to be located in the Gosford LGA and two thirds in Wyong LGA. The expected population growth will comprise 65% by migration and 35% by local natural increase.

Problems for future residential development in Gosford.

The vast majority of the population in the Gosford LGA reside in the coastal fringe. This is the narrow area separated by a 300m high escarpment at the edge of the Central Coast Plateau (CCP) and the coastline. It is broken up by a convoluted waterway (Brisbane Waters), and a number of creeks and lagoons. This geography has created a planning nightmare for the provision of roads infrastructure, as typified by the hugely expensive \$174 mn interchange currently under construction at West Gosford to deal with the bottleneck created by vast numbers of vehicles that travel between Gosford and Sydney daily and which come from the coastal suburbs. Another example is the massive effort that went into widening The Entrance Road, the main coastal arterial road that facilitates access from the West Gosford bottleneck to the coastal suburbs and Wyong.

The two public works projects mentioned exemplify the problems created by unrestrained population growth in this region that has been allowed up to the present. Should further unrestrained residential expansion be allowed to occur in this coastal area of Gosford to 2031, there appears to be no way of expanding on this infrastructure. In essence Gosford has Manns Road and The Entrance Road/Central Coast Highway to deliver motorists (residents) into and out of Gosford from many of the current suburban areas. In this context, where will the proposed one third of the additional 64,250 new residents expected on the Central Coast in the next 17 years reside within Gosford LGA, and in the future how will governments avoid the whole area becoming a worse gridlock than it already is? It begs the question, should this number of new residents be permitted in the Gosford LGA, when the recent history of expensive remedial infrastructure developments demonstrates the unsuitability of the region's geography toward supporting such an increased population?

Problems for future residential development in Wyong.

Vast tracts of Wyong LGA are seriously adversely impacted upon by underground mining resulting in a documented mine subsidence issue that must receive serious consideration when evaluating areas for possible future housing development. Future unsuspecting new residents in Wyong LGA

¹ see URL in footnote on p1.

must be protected from the problems of owning a house on top of these conditions. In this context, where will the proposed two thirds of the additional 64,250 new residents expected on the Central Coast in the next 17 years reside within Wyong LGA. Should this number of additional residents be permitted in the Wyong LGA, much of which is geologically unsuitable?

The final determinants of future residential development in the region are that both Gosford and Wyong LGAs have significant areas of National Parks and State Forests that are unavailable for suburban residential development and there are areas of high conservation value that must be protected.

For all of these reasons I would caution against accepting the proposed population growth of 64,250-100,000 to 2031, as a given. Sixty five per cent of the proposed increase is in new people who will need to be housed. It is within the NSW Government's planning powers to restrict the areas that are available for residential development on the basis of known geographical limitations. If the required amount of new housing stock was not available, then migration to this region would be less than is suggested. It would also help to manage the demands on transport infrastructure in the future.

However there is potential scope for the creation of a new residential subdivision within Gosford LGA. In the area of the CCP there is a long-standing Somersby Industrial Estate (SIE) created by the Wran Government that has not fulfilled its expectation. Commercial and industrial use of the land has been slow and is still incomplete. I would strongly recommend that the NSW Government revisits this land use plan to see what can be done to make its use more attractive to business investors. Overall the site might do better if it was presented as cleared, better maintained and available. As it is, it is presented as a scruffy, unappealing area. Clearly there appear to be difficulties, which have detracted from its usefulness and appeal to industry. The boundary of the SIE could be revised to better reflect its likely future commercial demand. It is also possible that discrete unsaleable areas of the SIE unsuited to commercial activity, may be able to be re-zoned for residential subdivision.

Beyond the SIE lie the rural lands of Somersby, Central Mangrove, Mangrove Mountain, Kulnura, Peats Ridge and Calga. This is zoned Rural 1a Agriculture. The area between the SIE and Peats Ridge Road in Somersby has recently been proposed for rezoning to allow smallholding rural residential development. This same restricted area could be rezoned for suburban residential development, providing with Kariong a corridor on either side of the M1 Pacific Motorway. The Somersby Residential Precinct (SRP) would be equally accessible to both Gosford and Wyong and would alleviate future pressure on transport infrastructure in the coastal area. The Old Sydney Town site could also be purchased and, along with the residual re-zoned land of the SIE, included in the SRP.

2. Population increase on the Central Coast to 2031 and its impact on jobs

The Discussion Paper identifies the need for 30,750 new jobs to meet the demand from the expected 64, 250 new residents by 2031. On the other hand, the CCRAP states that in excess of 45, 000 new local jobs will need to be created to meet the demand from its expected increase of 100, 000 new residents by 2031.

Yet we presently have around 38,000 Central Coast residents commuting to jobs outside of the region (Anon. 2012b), which should be the focus of attention in the proposed CCRGIP, before any time is spent on the needs of possible new residents. Emerging information technology, communications and renewable energy sectors create a host of new potential business opportunities for the Central Coast.

3. Primary Production

The rural lands of the Central Coast in the area identified previously as the CCP, comprising the districts of Somersby, Central Mangrove, Mangrove Mountain, Kulnura, Peats Ridge and Calga zoned Rural 1a Agriculture, represent an incredibly valuable food producing resource for Sydney both now and in the future. This area historically produced citrus. More recently citrus has declined although still present and there is also production of field and protected vegetable, flowers, nursery, chicken meat and eggs, avocados, stone fruit, vegetable seedling, a range of organic produce, cattle, alpaca, sheep and horse breeding undertaken. The Rural 1a Agriculture zoning has been rigorously protected over many decades, firstly by officers of NSW Agriculture, when that department had the final say on DAs impacting on this zoning and more recently by Gosford City Council, but the area remains underutilised for this purpose.

Since 2008 attempts have been made to draw the NSW Government's attention to the need to identify important agricultural lands in the Sydney Region and in particular the Sydney Basin and to explore strategies for ensuring sustainable agricultural production to serve the expectations of the increasing Sydney population (Docking & Sreekumar 2008, Anon. 2009, Anon. 2012a).

A forum, ***Sydney's Agriculture - Planning for the Future***, December 2008 backgrounding these efforts, can be found at http://www.dpi.nsw.gov.au/__data/assets/pdf_file/0009/274914/sydneys-agriculture-planning-for-the-future-forum-outcomes-report.pdf

In 2012, in a response to the NSW Government Discussion Paper ***Sydney Over the Next 20 Years***, the Agricultural Reference Group (ARG) stated " *that with careful planning it should be possible to accommodate the balance between housing, jobs and land for agriculture into the Metropolitan Strategy for Sydney. Currently more than 50 per cent of the existing fresh vegetable producers and significant poultry production is in the designated growth areas of north western and south-western Sydney. There is no apparent strategy or policy for their recognition let alone their relocation from these areas with(in) the Sydney Region. Agriculture continues to be a 'remnant' issue to be considered after all other issues.....Land use planning should be linked not only to transport and infrastructure but also include agriculture.*" (Anon. 2012)

The rural lands of the CCP are uniquely placed to become the area where some of the agricultural activities presently conducted in the SW and NW designated growth areas of Sydney could be relocated. The CCP affords clean aquifer water for crop and stock use, a better climate for crop production than exists in the Sydney Basin, access to natural gas, and importantly, proximity to the Sydney Fresh Produce markets at Homebush that, with the construction of the new tunnel connecting the M2 and M1 Pacific Motorways, will become even more accessible.

The soils of the CCP, derived from the Hawkesbury Sandstone, provide the perfect medium for crop production.

Protecting land for agricultural activities is one thing, but I have observed a diminution of agricultural use of land in this area, with many properties allowed to deteriorate into a state of neglect and wastage, allowing uncontrolled weeds to thrive. It is eroding the very purpose this rural land was classified to be used for.

To achieve a meaningful outcome will require the NSW Government to become proactive with policy action and incentives to ensure that the lands of the CCP zoned Rural 1a Agriculture are identified and used for the purposes of present and future food production for Sydney and are embraced in a Planning Instrument for Agricultural Production on the Central Coast Plateau.

The following could be a key component of the proposed new Planning Instrument for Agricultural Production on the Central Coast Plateau. One of the significant horticultural industries that will be severely impacted upon by the growth of Sydney in the SW corridor is protected cropping, of which there is presently a large area of production. The CCP could be the site for a new protected cropping precinct involving high tech, environmentally-controlled glasshouse structures and advanced hydroponic production techniques for intensive horticultural production. This could be located in proximity to the natural gas pipeline. Natural gas is the most cost-effective energy source for heating. This industry is highly productive on a small footprint with high water use efficiency and in this area would have low carbon miles from farm to market. A large range of fresh produce is produced by this industry and the CCP could become a market leader, providing considerable employment opportunities for the local community. The NSW Government could identify and protect an area for this purpose. It should be noted that the NSW DPI has a research unit for protected horticulture located at Gosford, which provides a local centre of expertise, which should be further exploited.

Specific measures in the proposed new Planning Instrument for Agricultural Production on the Central Coast Plateau could include:

- Identify the need for an area to provide for those agricultural activities that will be lost in the SW and NW growth areas of the Sydney Basin
- Recognise the value of the CCP area for primary production and to protect it for that purpose
- Put in place instruments that will identify:

- a. an area of sufficient size, in an appropriate location and aspect and with proximity to the natural gas pipeline, as a future Protected Cropping Precinct,
- b. a scheme including the provision of incentives to encourage dislocated farmers from the SW and NW growth areas to relocate their farming enterprises to this area,
- c. policy measures including the provision of incentives to direct and develop the CCP as an area of importance for its development as a food producing region for Sydney.

Planning for the proposed new Planning Instrument for Agricultural Production on the Central Coast Plateau should involve participation by the Sydney Agricultural Reference Group, the Central Coast branch of NSW Farmers, bodies representing major horticultural groups in the Sydney Basin and members of the CCP community, as well as government departments, to achieve the right outcome for all parties and a credible plan for the future.

4. Coal seam gas (CSG) and coal mining

These are some of the most contentious public policy areas for governments and affected communities at the moment. I note that the South Western Sydney and Western Sydney and Blue Mountains Regional Action Plans both identify the management of the impact of CSG and long-wall mining as Priority Actions. The Central Coast RAP does not, although it does refer to "*the need to protect the quality and supply of water within the Central Coast's water catchment areas through local management initiatives.*"¹ This is not the same strength as the statement in the two other RAPs that say "*the impact of mining or CSG activities on agricultural lands will be taken into consideration before exploration activities are approved. All new exploration activities requiring a Review of Environmental Factors will be required to produce an Agricultural Impact Statement prior to approval.*"²

The CCP contains aquifer water reserves relied upon by the local community for its agricultural activities, agribusiness and for its own domestic consumption. Two agribusinesses, East Coast Food & Beverages, producing a range of fruit juices, and AGRANA, producing fruit-based preparations, both rely on an abundant supply of potable water and for that reason place great emphasis on continued access to aquifer waters from the CCP. The CCP is also the catchment for the Gosford town water supply.

The industrial and mining processes engaged in as part of CSG mining indisputably render aquifer water reserves unfit for human use. Of vital importance is the fact that such an outcome would

¹ p14 Central Coast Regional Action Plan see URL in footnote on p1

² p17 South Western Sydney Regional Action Plan

http://www.nsw.gov.au/sites/default/files/regions/regional_action_plan-western-sydney-blue-mountains.pdf and p18 Western Sydney and Blue Mountains Regional Action Plan

https://www.nsw.gov.au/sites/default/files/regions/regional_action_plan-south-west-sydney_2.pdf

destroy the *current* population carrying capacity of the Central Coast, never mind the *proposed* additional carrying capacity.

CSG exploration and mining must not be allowed to happen in the CCP region. A recently completed comprehensive survey of the local community identified 98.2% support for the region to be gas field free! The Mountain Districts Association is presently making representation to have the CCP removed from an AGL exploration licence as part of the licence renewal process.

Wording such as that quoted previously from the South Western Sydney and Western Sydney-Blue Mountains Regional Action Plans should be included in the CCRGIP and in the proposed new Planning Instrument for Agricultural Production on the Central Coast Plateau. It is paramount that an Agricultural Impact Statement is a mandatory requirement of any proposal involving the Central Coast Plateau.

5. Environmental attributes of the Central Coast

I am aware that there is an abundance of published information identifying important flora, fauna and natural resources of the Central Coast and consideration of these data should be a high priority in any CCRGIP.

Recommendations for a Sustainable Central Coast Regional Growth & Infrastructure Plan:

It is acknowledged that development is an inevitability, but to what extent and how is it to be balanced against competing demands for land use and the community's wishes?

As I mentioned at the beginning, I believe that the wrong approach to the preparation of the CCRGIP is being taken. It is top down, accepting without question the expected increase in new residents, even though the actual estimated figure varies widely between government planning documents that are less the two years apart, and the associated new housing and demand for new jobs that this will bring. This is reckless and unjustified.

Instead I would propose a bottom up approach. That is after a critical examination of the problems and existing challenges of the region and the community's inputs, to use this as the basis for determining the level of growth the Central Coast Region can reasonably sustain.

Unrestrained population growth of the scale expected to 2031 will exacerbate the problems already present.

If the proposed plan includes support for Sydney then it needs to address the following key regional issues:

1. Providing new jobs to meet the demands of the 38,000 Central Coast residents who presently commute to jobs outside of the region. This will relieve the pressure on some of Sydney's arterial roads such as the Pacific Highway from the M1 Pacific to the CBD, Lane Cove Road and Pennant Hills Road, as well as the pressure on regional arterial roads such as the Central Coast Highway. It will also relieve the pressure on rail services. Apart from congestion considerations there are also the infrastructural costs of expansion, upgrade and replacement that have to be borne by the NSW Government.

Address the local jobs deficit between now and 2031 and a significant contribution will have been made to Sydney's future.

2. A Central Coast Conservation Plan that utilises the vast amount of already gathered information on flora, fauna and natural resources should be created to underpin the preparation of the draft CCRGIP. For example significant environmental considerations could include vegetation habitats of endangered plant or animal species as well as vegetation types peculiar to the region. These should be exempt from the threat of development and protected in a Regional Environmental Plan.

3. Areas unsuitable for new residential subdivisions. Examples have been given in this submission of why the coastal areas of the Gosford LGA and parts of Wyong LGA should not be subject to further residential subdivision. In this context it is suggested that a sustainable limit be set

on regional population growth and it may just avoid a repetition of the incredible public works expenditure that has gone into two small points of traffic congestion, namely the West Gosford Interchange and expansion of a small distance of The Entrance Road between Erina and Wamberal. Consider areas for the proposed SRP as a suitable area for future residential development.

4. Lands of the CCP zoned Rural 1a Agriculture, excluding that area in Somersby zoned for rural small holding subdivision, should be protected from any future threat of rezoning for any purpose and from non residential development that has an adverse impact on the community and its natural resources. These include sand mining, coal mining and coal seam gas exploration and other as yet unidentified extractive industries.

I would strongly recommend that all these important matters be used to guide a decision about setting an upper limit for population growth that can be sustained in the region. Commence the consideration of the Draft CCRGIP from there.

It is far better to take a stance informed by the community. Infrastructure takes significant funding and we have seen how scarce this can be when major public works are proposed. You only have to look at the endless stream of plans and proposals about transport corridors, light rail etc to provide for Sydney's burgeoning transport needs. Prevarication comes to mind. So for this region we need to be very careful about the form of the subsequent CCRGIP if it is to have any credibility and a chance of delivery.

References

Anon. 2012a. A submission to the NSW Government Discussion Paper Sydney over the next 20 years. prepared by the Agricultural Reference Group - Sydney Region, June 2012, 13pp.

Anon. 2012b. Central Coast Regional Action Plan. NSW Government, Department of Premier and Cabinet, 23pp.

Docking, A. and Sreekumar, C. 2008. Planning for food production within the Sydney Metropolitan region. Proc. International Cities Town Centres & Communities Society, Sydney Olympic Park, Sydney, Australia, 7 - 10 October 2008 13pp.

Docking, A. 2009. Sydney's agriculture - planning for the future. 3pp.