



A community group working towards advocating all levels of Government to improve planning outcomes and achieve more environmentally sustainable, ecologically sound and liveable environments for our communities.

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8 June 2020

## Submission on the Draft Local Strategic Planning Statement Central Coast Council – 8 June 2020

Dear Sir /Madam

This submission is presented on behalf of the Central Coast Community Better Planning Group (**CCCBPG**). The vision of our group is to work towards achieving more environmentally sustainable, ecologically sound and liveable environments in our community. Our group consists of community representatives from each Ward within the local government area of the Central Coast.

To prepare this submission a series of Zoom meetings have been conducted and the submission was prepared using Google Drive. It therefore has the direct input from community representatives from across the Central Coast.

In preparing our submission we appreciate the opportunity that Council has provided to invite comment on the development of the Local Strategic Planning Statement (**LSPS**). We understand the requirement to prepare a LSPS became a legal obligation upon the Council in March 2018 as a result of an amendment to the *Environmental Planning and Assessment Act 1979* (**EPA Act**). We recognise in accordance with the legislative requirements that the LSPS will set out:

- *The 20-year vision for land use in our local area*
- *The special characteristics that contribute to our local identity*
- *Shared community values that should be maintained and enhanced*
- *How growth and change will be managed into the future*

As a Community group that has multiple community representatives from each Ward, we believe our submission identifies and reflects the concerns of a wide cross section of our community. We therefore request Council take due consideration of the comments provided.

To assist in understanding of our observations and comments Part A presents global issues Part B presents specific issues and Part C presents Ward specific matters.

## Part A - Global Concerns

### ***Observation G1***

We note that the vision of the draft LSPS identifies that *'well-considered and consistent approach to planning is required ...'* and *'that the Central Coast is a great place to live, with a passionate community that wants to see their way of life enhanced without sacrificing their valuable natural assets or relaxed lifestyle.'*

### ***Comment G1***

We fully support the sections of the Vision presented above. However, the context and direction of the draft LSPS in our opinion does not reflect the vision. To have a well-considered and consistent planning approach that reflects the passion of the community that protects the valuable natural assets and relaxed lifestyle, the preparation of the draft LSPS should have had significant Community engagement.

We note with alarm on page 26 of the draft LSPS that only 30 submissions and 58 pin drops on the interactive map were received in respect to the draft Urban Spatial Plan (USP). Which we understand the Council has used and relied upon to inform the draft LSPS. This indicates that only 0.026% of the population were motivated to present an opinion via a written submission or placement of a pin. The question arises what does the other 99.974% of the population of the Central Coast regard as the local planning challenges and opportunities.

As only 0.026% of the local population was presented an opinion via a written submission or placement of a pin, we consider the current draft LSPS has been prepared from the top down rather than from the ground up. Therefore, we believe the current draft LSPS is not a true reflection of the future planning direction as desired by the community.

Given our representation across the Central Coast local government area we request that Council take careful consideration of the comments presented.

### ***Observation G2***

We note that the profile of the Central Coast is presented on page 22 and 23 of the draft LSPS. The profile presented for the Central Coast is presented from the perspective of an economic planner. We believe the profile presented does not reflect the diversity of the Central Coast.

We consider key elements of the profile of the Central Coast have been overlooked.

### ***Comment G2A***

One of the major key elements overlooked is the Coastal Open Space System (COSS). As Council would appreciate the COSS protects the most sensitive areas from all future development.

Furthermore, the COSS has its origins in the 1975 Gosford Wyong Structure Plan (GWSP) and the Gosford Wyong Rural Land Study (RLS).

Both the former Gosford City Council (GCC) and Wyong Shire Council (WSC) had equal opportunity to implement the strategies enclosed in the GSWP and RLS. Only the former GCC had the foresight to adopt a continuous open space system for the coastal areas.

As stated in Council' Community Strategic Plan 2018-2025

*"... every one of us who live on the Central Coast has an opportunity and responsibility to create a sustainable future which we can all benefit."*

The COSS provides a mechanism for the Council to provide a sustainable future in that it protects and enhances the biodiversity, scenic, cultural and recreational values of the Central Coast.

We strongly recommend that the COSS be listed as a key element of the Central Coast profile as no other local government area in Australia has a similar system.

#### *Comment G2B*

We note on page 10 of the NSW Example Local Strategic Planning Statement (ELSPS) prepared by the Department of Planning and Environment 2019, it provides an example of what elements should be included in a profile to describe a local government area. This brings us to the second element which we believe has been overlooked. On page 10 of the ELSPS it includes the following infographic



Given the fact that the Central Coast has five (5) National Parks, three (3) State Conservation Areas, ten (10) Nature Reserves, four (4) State Forests plus the Coastal Open Space System resulting in over 100,000 ha covered in native vegetation one would have to conclude that our local government areas is **"one of NSW most biologically diverse areas"**. As the Central Coast is one of the most biologically diverse areas we strongly recommend the above infographic be included within our LSPS profile.

#### *Comment G2C*

We again note on page 10 of the ELSPS that it identifies both tourism and agriculture as an important profile.

 Tourism generates  
**\$146 million**  
annually  
2018

 **\$302 million**  
agricultural gross value  
2018

Given the importance of local tourism and the fact that a large portion of our local government area is zoned rural we recommend that both a relevant infographic for tourism and agriculture be included in the profile

#### *Comment G2D*

We note on page 23 of the draft LSPS that a key profile is 81 km of Ocean Foreshore. By limiting the profile to just ocean foreshore excludes the fact that many more residents live around the foreshore of Brisbane Water and the Tuggerah Lakes system. Plus, the foreshore of the Hawkesbury River and the Coastal Lagoons of Cockrone, Avoca, Terrigal and Wamberal. The question arises why restrict the profile to just ocean foreshore?

We recommend that the LSPS profile of the Central Coast needs to include reference to the unique water ways of Brisbane Water, Tuggerah Lakes system including the foreshore of the Hawkesbury River and Coastal Lagoons.

#### *Comment G2E*

We note on page 22 and 23 of the draft LSPS that a key profile does not make any reference to our Aboriginal Heritage or the traditional custodians. This is concerning given the fact that on the Local Aboriginal Land Council Darkinjung's web site at [www.darkinjung.com.au](http://www.darkinjung.com.au) it states:

*In 2019 there are 2,985 registered Aboriginal sites located within the Darkinjung Local Aboriginal Land Council boundaries. The traditional boundaries of Darkinjung (Darkinyung) land extend from the Hawkesbury River in the south, Lake Macquarie in the north, the McDonald River and Wollombi up to Mt Yengo in the west and the Pacific Ocean in the East.*

We recommend that the LSPS profile of the Central Coast includes reference to our Aboriginal Heritage.

#### *Comment G2F*

We note on page 22 and 23 of the draft LSPS that a key profile does not make any reference to the fact that the Central Coast Council is its own Water Supply Authority. We recommend the LSPS profile should make reference to the scale and magnitude of our water supply to provide context as to why Water and Sewer are discussed on pages 138 to 140 of the draft LSPS.

#### *Observation G3*

Although the document is visually eye-catching with inspiring photos, we regard the report and summary document are poorly written, expressed and edited. Both documents are full of

unfathomable jargon, weasel words and non-sequitur sentences and paragraphs. This makes the documents unsuitable for community consultation as we find it difficult if not impossible to make any sense out of.

For example - What exactly does the following actually mean?

*“Promote housing growth of appropriate densities close to public transport that will encourage socially diverse population (sic) as well as accommodating short stays for visitors in a manner that does not impact connections and movement as well as limiting growth in environmental hazard areas of the Woy Woy peninsula.”* page 61

or this

*“Develop a cohesive public domain with special civic spaces that have a high level of environmental amenity and are functional, safe and legible.”* page 63

Or this

an “active transport facility” listed under new infrastructure proposals – page 135

In addition, the priorities and actions are mostly a description of the status quo or a plan to develop a further plan. This document does not achieve its purpose of presenting a 20-year vision of the future of the Central Coast. *Comment G3A*

Discussion amongst members of our group has been active on the observation that the report and summary are poorly written, expressed and edited. We believe ‘*a plain english*’ report and summary document would have encouraged greater community consultation.

We understand that although the Council must submit an adopted LSPS to the NSW Government by July of this year we regard the current report as inadequate. We strongly recommend that a statement be included within the report that during the limited community consultation the community expressed concern that they considered that the exhibited draft LSPS should be withdrawn. The purpose of withdrawing the exhibited draft LSPS was to enable wider and active community consultation to be undertaken and a new plain english draft which had been adequately proof-read and re-exhibited for public comment.

*Comment G3B*

The LSPS makes some provision for medium density development around transport nodes at Tuggerah and Warnervale which is commendable, but it also encourages further density on the coastal strip most notably in The Entrance, Long Jetty. Given the majority of employment generating development and transport nodes are proposed west of the Tuggerah Lakes it seems likely this will promote a large commuter population each day. Some consideration should be given to encouragement of more population density west of the lakes or to begin identification of a light rail corridor for future commuters.

*Comment G3C*

The plan does not consider the impact of changes to State Planning policy re complying development on population, infrastructure or land use. This and other state planning policies will have a significant impact and should be addressed in the plan.

#### Comment G3D

The plan fails to acknowledge or examine the extensive specific issues and opportunities of specific geographic communities. The presentation and analysis of the report reads as if the Central Coast was a giant urban sprawl. In fact, it is made up of many communities largely related to topographic features. All of these communities present different planning challenges but also a huge range of opportunities which are not addressed in the LSPS.

For example, the Woy Woy Peninsula which has a population of 37,856 (i.e. 11% of CC population or 21.5% of former Gosford LGA) and which services an even wider area is not considered as a planning entity at all. The impact if this is demonstrated by the lack of specific proposals for new and expanded public transport for the Peninsula which should be included in the LSP.

#### Comment G3E

The plan does not acknowledge that many existing areas such as the Woy Woy Peninsula have an infrastructure deficit which needs to be addressed before increasing the population. All statements about managing the population growth within existing and planned infrastructure capacity are meaningless if population is increased before infrastructure capacity can or has been assessed. Any changes to planning controls aimed at increasing population should be contingent on infrastructure capacity being demonstrated, and not on the fact a plan is being developed to address infrastructure needs.

## Part B - Specific Concerns

### *Observation S1*

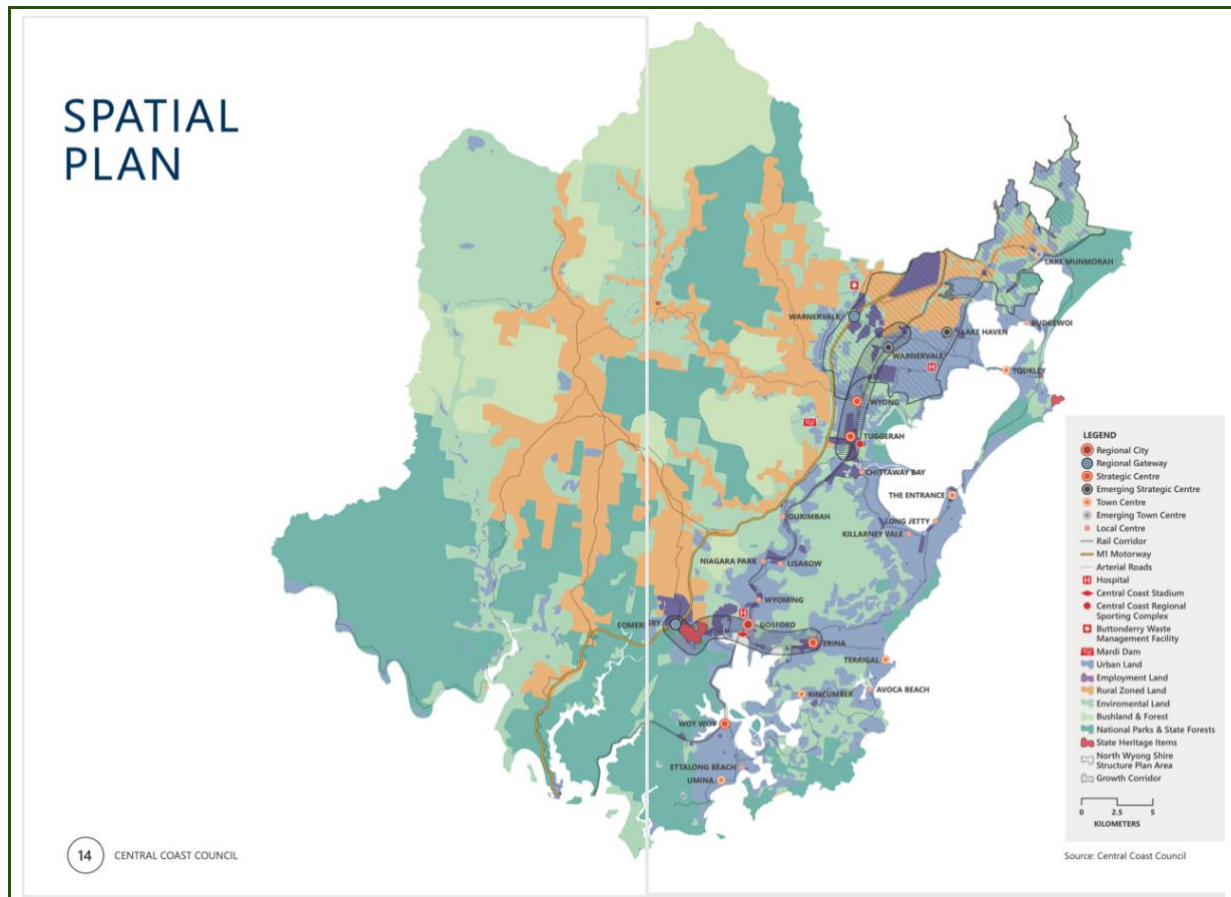
We note on page 6 of the draft LSPS that space has been left for the Chief Executive Officer (CEO) to add a message.

### *Comment S1*

We are perplexed on why a message is being added to the draft LSPS from the CEO. We note in the Community Strategic Plan *One Central Coast* the opening message was provided by the Mayor. As the LSPS provides the planning framework for the Central Coast we believe the opening message should be provided by the Mayor. As the Mayor is the elective representative of the people.

### Observation S2

The Spatial Plan copied below which is located on page 14 of the draft LSPS we find misleading and confusing.

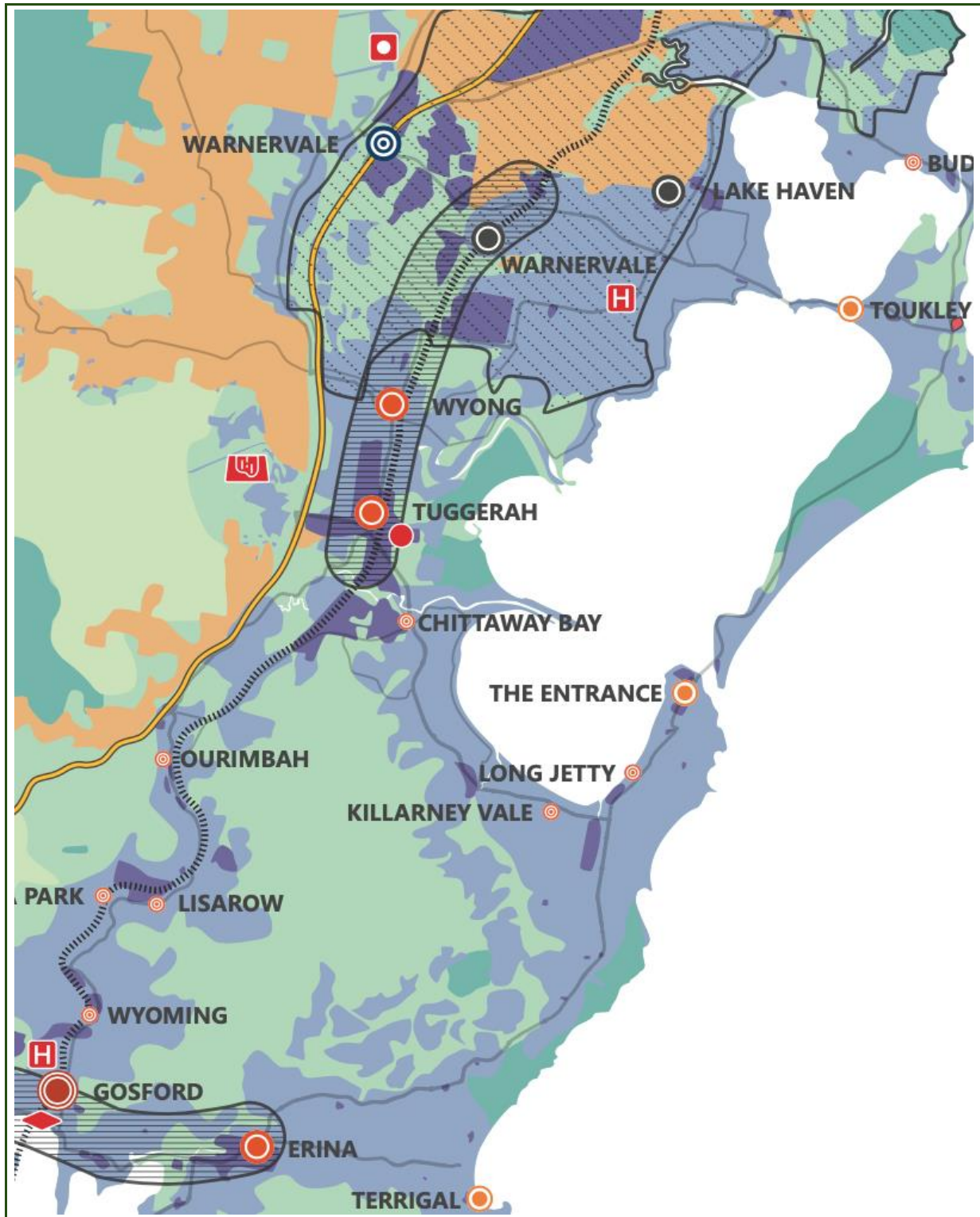


The reason we find it misleading and confusing is because it identifies areas such as Picketts Valley, land between Kincumber and the Bouddi Peninsula, Erina Valley, Matcham Valley, Holgate Valleys, areas along Tumby Umbi Road, areas west of the M1 Motor at Tuggerah which are all zoned as either deferred, E3 Environmental Management or E4 Environmental Living zone are defined as **urban Land**. Furthermore, properties west of the M1 Motorway along Hue Hue Road which are zoned R5 Large Lot Residential are likewise classified as **urban land**.

From a layperson's perspective this map appears a backdoor mechanism to rezone land.

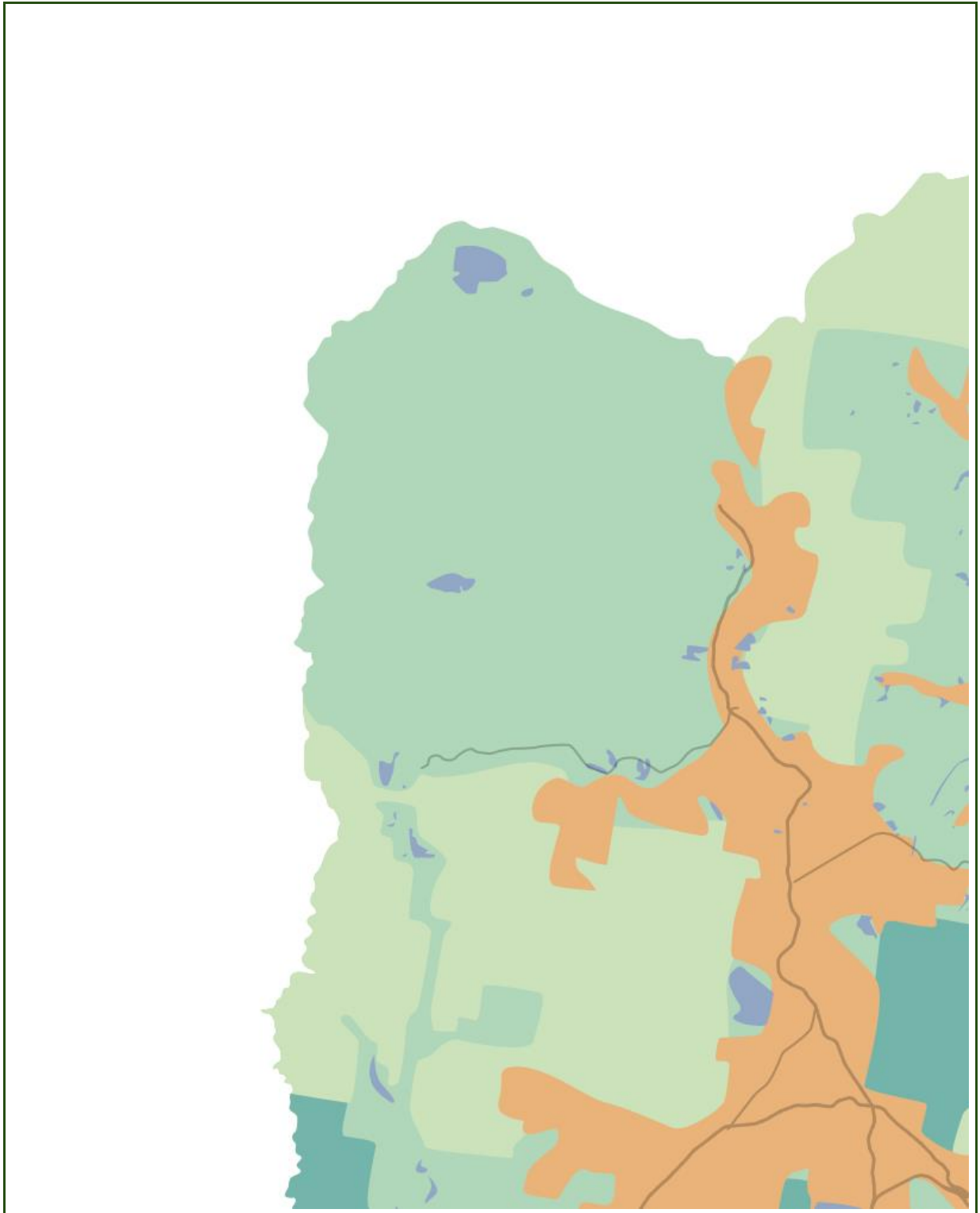
See enlarged section of Spatial Plan - between Warnervale and Erina





Furthermore, lands west of the M1 Motorway are colour coded urban growth. See enlarged section of Spatial Plan in Mangrove Creek Dam





*Comment S2*

The classification of ***urban land*** being applied to deferred land, E3, E4 or R5 zoned land in our opinion is not a true reflection of what the community regards urban land. In our opinion we strongly recommend that areas of Picketts Valley, land between Kincumber and the Bouddi Peninsula, Erina Valley, Matcham Valley, Holgate Valleys, areas along Tumby Umbi Road, areas

west of the M1 Motor at Tuggerah and along Hue Hue Road not be identified as urban land. Instead the land should be identified as Environmental Land.

Furthermore, the colour coding of urban land in the Mangrove Creek Dam is illogical.

The Urban Land identified in the map for the Lake Munmorah region fails to identify the Employment, Commercial, Educational, Recreation/Sports, Biodiversity Corridor lands or land claims within the corridor, nor the land use conflicts of Consolidated Coal Leases that are identified in the Greater Lake Munmorah Structure Plan. It does not identify where the \$180 Million per annum of mineral extractions that will take place, as identified in the Central Coast Regional Plan 2036.

### ***Observation S3***

A copy of page 27 of the DLSPS provided below states that through community consultation it identified key areas. The report goes on to state:

*The themes that featured strongly in the community feedback include employment opportunities, public amenity, transport infrastructure, pathways, quality development, preserving bushland and planning for centres.*

## WHAT WE'VE HEARD SO FAR...

The LSPS has been informed by recent discussions with our community through the draft Urban Spatial Plan.

This engagement offered important insights into local challenges and opportunities in the Region, with eight key areas identified. The themes that featured strongly in the community feedback include employment opportunities, public amenity, transport infrastructure, pathways, quality development, preserving bushland and planning for centres.



LOCAL STRATEGIC PLANNING STATEMENT

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### *Comment S3*

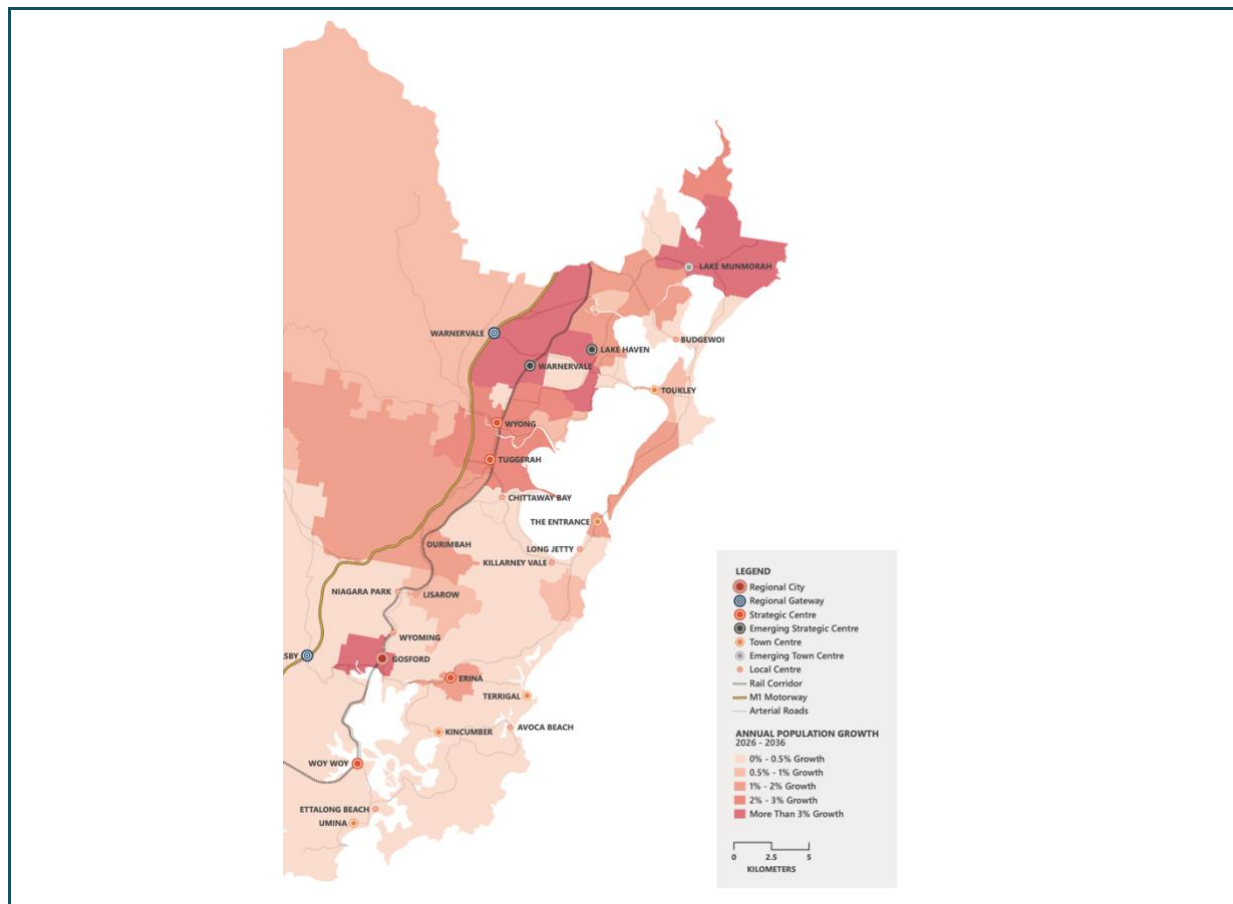
The question arises why has the infographic of an airplane with runway along with the text stating *Plan for and support Warnervale Airport* been presented on page 27 when the community feedback from the draft Urban Spatial Plan did not identify this as a strong theme?

Members of the community have never seen a business case to support investment in a Central Coast airport. Members of the community have read numerous opinions which generally state that it is not an economic proposition for a regional airport. Furthermore, any extension of the airport would have a significant effect on the largest freshwater wetland remaining on the Central Coast.

As the community did not identify this as a strong theme this infographic icon and text should be deleted.

### *Observation S4*

A copy of the right-hand side of page 28 of the draft LSPS provided below presents the annual population growth from 2026-2036.



#### *Comment S4A*

The above map is misleading. This is because it identifies Strickland State Forest, Palm Grove Nature Reserve, Wyrrabalong National Park as having projected population growth of between 1% - 2% and Lake Macquarie and Munmorah State Conservation Areas of more than 3% and Erina Valley of between 2% - 3%. However, we understand land in Erina Valley which is currently zoned Deferred Matter, is likely to be zoned E3 Environmental Management. Clearly these are not urban growth areas.

Areas south of Sparks Road between the railway and the M1 Motorway have also been nominated for large population growth but much of this area is within the Porters Creek E2 Environmental Zone and clearly cannot be developed.

Furthermore, the areas Olney State Forest, Jilliby State Conservation Area, Yarramalong and Dooralong Valleys all have a projected population growth of between 0.5% - 1.0%.

We recommend that only the urban areas which have been identified for growth be colour coded otherwise the map is irrelevant as it is not presenting a true impact

#### *Comment S4B*

The above map on page 28 shows an expected population growth of between 2 to 3% in the strategic centres of The Entrance and in the Long Jetty/Bateau Bay area. Plus, more than 3% in the Gosford City Centre. It is anticipated that this growth is mostly likely achieved through increased density in these areas.

It is critical that residents be provided with proper open space areas if good health is to be maintained.

Preliminary findings from an extensive review of the current research and evidence on the connection between nature and health by Parks Victoria, and the School of Health and Social Development of Deakin University (Townsend et al. 2015) found that:

- people living more than 1 kilometre away from a green space have 1.42 higher odds of experiencing stress than those living less than 300 metres from a green space
- residents in neighbourhoods containing more than 20% green space were significantly more likely both to walk and to participate in moderate to vigorous physical activities at least weekly.

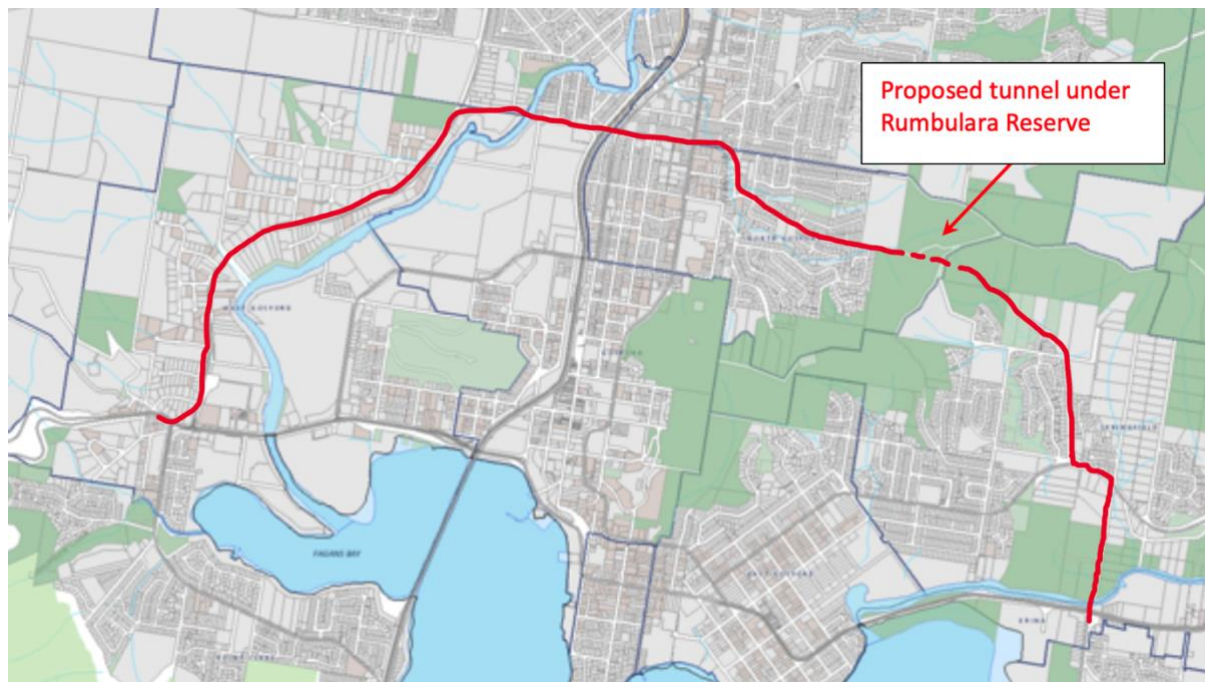
Open space at the levels suggested by standard planning practice of 7acres/1000 head of population or 28m<sup>2</sup> per person is a bare minimum and we strongly suggest this figure be exceeded.

The Australian State of the Environment Report of 2016 supports the findings of the Deakin University study above and recommends 20% total land area open space distributed in an area so that no person is more than 400 metres from an area available for fresh air and exercise. Great care should be taken to ensure the LSPS reflects these figures as presently the statement fails to provide anything but minimal comment on open space.

#### *Observation S5*

On pages 57 and 58 of the DLSPS it discusses the importance of Gosford being the Capital of the Central Coast. However, key elements that are missing from the discussion is a consideration of vehicle traffic around the City Centre and eliminating the pedestrian and traffic conflict at the waterfront.

To remove the pedestrian/traffic conflict at the waterfront and traffic Council is requested to consider the option of developing an east west/north south road to bypass the City Centre and remove vehicle traffic from Dane Drive. A proposed route is presented in Figure 1.



**Fig 1 Proposed east west /north south road bypass around the Gosford City Centre**

The proposed route has the following advantages:

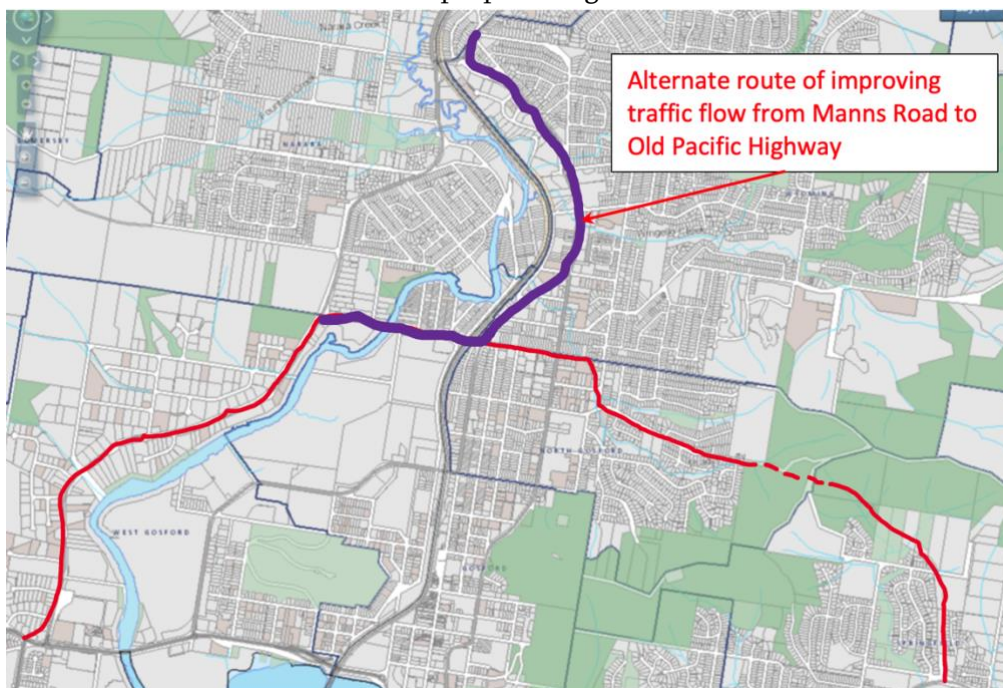
- A. The route commences at West Gosford therefore there is no requirement to construct an alternative access from the M1 MotorWay down the escarpment which was an earlier consideration of Council.
- B. The road grade along the entire route is level except for a slight grade variation in the central section of Glennie Street. This slight grade variation is not significant at the grade changes in elevation approximately 10 metres over a distance of approximately 200 metres.
- C. The proposed east / west bypass can be linked to the north / south upgrade of the Old Pacific Highway. The RMS website indicates the State Government is planning the upgrade of the Narara to Lisarow – Pacific Highway and Manns Road upgrade between Narara Creek to Parsons Road consisting of the Northern section and Southern section illustrated in Fig 2.





**Fig 2 Proposed upgrading of the Narara to Lisarow**

Rather than constructing the Southern section colour coded blue in Fig 2 it is suggested the Northern section colour coded green should follow the existing Old Pacific Highway to the intersection of Glennie Street colour coded purple in Fig 3.



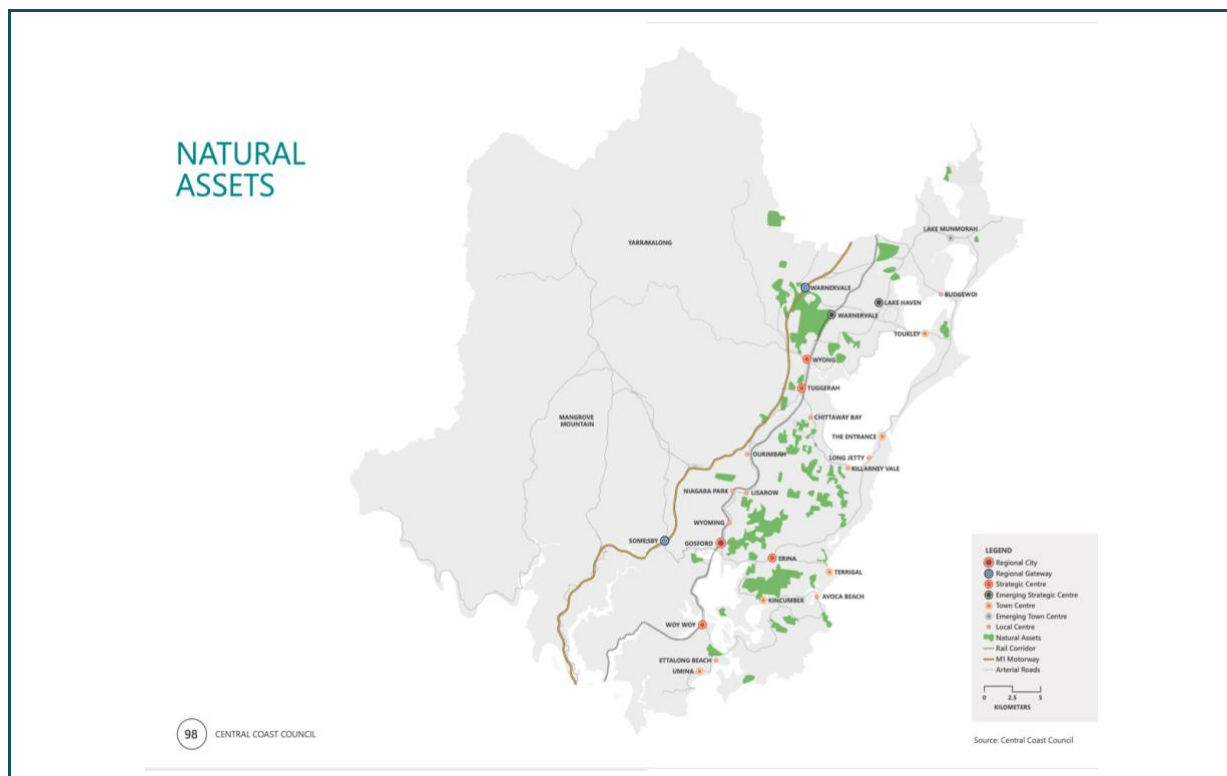
**Fig 3 – Alternative route to Manns Road and Old Pacific Highway**

This alternative route has the benefit of:

1. A major section of the Old Pacific Highway is already four lanes.
2. Relocating a proposed new railway bridge at the intersection of Manns Road with the Old Pacific Highway to the intersection of Glennie Street. Due to the proximity of Glennie Street to Etna Street the relocation of the railway bridge crossing to Glennie Street should avoid the need to expand the railway bridge crossing at Etna Street.
3. Constructing one new bridge over Narara Creek at the western end of Glennie Street west avoids the requirement to construct two new bridges over Narara Creek and its associated tributaries on Manns Road.
4. Avoids the residential section of Narara which fronts Manns Road
5. Widening the western end of Glennie Street west is adjacent to the Gosford Show Ground and the small industrial estate. This gives improved access to both the Showground and the industrial estate.
6. Directing traffic along the Old Pacific Highway improves vehicle traffic to the commercial development along the Old Pacific Highway.
7. That section of the road from Manns Road to the intersection of Glennie Street and the Old Pacific Highway involving the crossing of Narara Creek and the railway line is the same route as the proposed east west bypass.
8. Cost of major infrastructure can be shared with two major projects of east west bypass and north south bypass diverting traffic around Gosford City Centre.

### ***Observation S6***

The Natural Assets map copied below which is located on page 98 of the draft LSPS we find inadequate if not grossly underestimating the value of the natural assets under the care control and management of Council.



#### *Comment S6A*

The reason we find it inadequate is because the map does not identify the natural areas retained in their natural state within the water supply catchments or buffer areas around sewer treatment facilities.

It appears the Natural Assets map has been prepared purely based upon which Directorate in Council is responsible. For the community to have a true appreciation of the natural areas under Council's care control and management all lands need to be identified. To distinguish between different areas of management control which is set by the organisational structure within Council it is suggested that different colour coding could be applied.

#### *Comment S6B*

When discussing the Natural Assets, we believe a major oversight in both the map and supporting text is that there is a complete omission of the identification of the COSS. To understand the unique value of the COSS it is important to understand its origins.

In 1975, the NSW Planning and Environment Commission published both the Gosford Wyong Structure Plan (GWSP) and the Gosford Wyong Rural Lands Study (RLS).

The RLS, recognised that:

*Too often the word rural has been applied merely to land used for primary production, and it has not been appreciated that a rural background is an integral part of an urban region. Where there is a large population this rural background assumes special importance. <sup>1</sup>*

*To protect the rural character, it is necessary to understand what makes an area attractive and how the natural environment functions, so that the use of the land does not destroy its intrinsic qualities. <sup>2</sup>*

*If the quality of both the landscape and the environment of Gosford/Wyong is to be maintained and if possible improved, it is essential that the most sensitive areas are protected from all future development. <sup>3</sup>*

The key message from the RLS is that ‘*the most sensitive areas need to be protected*’.

The reason the community places such a high importance on COSS is because it provides five main factors that made the former Gosford Local Government Area (GLGA) unique. These factors revolve around the scenic quality, natural setting, human interaction, cultural significance and the system itself.

The **scenic quality** the COSS lands provides a visual backdrop across the former Gosford Local Government Area (LGA) and contributes to a sense of place. By Central Coast Council adopting the principles of COSS in the former Wyong LGA this sense of place could help identify a new Central Coast identity.

The **natural setting** of the COSS lands and future COSS in the former Wyong LGA covers and would cover land which is substantially unaltered natural ecosystems that provides a range of wildlife habitats and includes a diversity of vegetation species and associations.

Given the location and extent of COSS in the former Gosford LGA and the opportunity for future COSS in the former Wyong LGA in such close proximity to residential areas they provide the greatest opportunities for **human interaction** involving recreation, education and scientific endeavours.

As the COSS lands fall across a diverse range of landscapes, they contain many Aboriginal sites and contain elements of settlement. The COSS lands are therefore **culturally significant**. Although several Aboriginal cultural sites are located within COSS lands their presence is not well understood. Although local Aboriginal culture is not well understood the Annual 5 Lands Walk conducted across the COSS reserves provides Council the opportunity of working with the local Aboriginal community.

Due to the size, proximity and linkages of COSS, the system itself enhances the overall value of individual reserves. Consequently, its combined biodiversity value is increased and made more robust.

<sup>1</sup> Department of Planning and Environment - Rural Lands Study 1975 page 7 (DPE – RLS)

<sup>2</sup> DEP - RLS 1975 page 13

<sup>3</sup> DEP - RLS 1975 page 46

As stated in Council's Draft Biodiversity Strategy "... the COSS is not a legal mechanism for protecting and conserving land in the long term".

Acknowledging the vulnerability of potential local political influence of changing 'Community' land classification to 'Operational' land under the Local Government Act 1993, the restrictions of environmental zonings within the Environmental Planning and Assessment Act 1979 and the limitations of the Biodiversity Conservation Act 2016 it is recommended that Council approach the Minister for National Parks and Wildlife Service (NPWS) to have the COSS classified as a Regional Park.

Classifying COSS as a Regional Park will ensure:

- The land is protected for perpetuity
- Council has full care, control and management
- Land use activities within the regional park can reflect the local communities needs and aspirations
- All values of the COSS will be protected including biodiversity, scenic quality, preservation of different landscapes and ecosystems
- Council will the opportunity to foster public appreciation, recreation and enjoyment of public land that is in close proximity to urban areas
- Both natural and modified landscape can be conserved
- Aboriginal and local cultural history can be conserved and at the same time promote a greater understanding and awareness of our cultural heritage

In addition, once COSS is classified as a Regional Park Council can utilise the E1 zoning to ensure the permitted uses reflect the true nature of the purpose of the COSS lands.

Furthermore, by classifying COSS as a Regional Park it is anticipated that this would resolve the different land tenure issues. As a Regional Park it is more likely other State Government Authorities like the Department of Environment and Planning, NSW Forestry Corporation would transfer suitable land holdings. The expectation on why State Government Authorities would transfer their land holdings to Regional Park is because land transferred would be secured for perpetuity and reflect State objectives.

Comment S6C

As Council was aware in October 2016, the State Government released the Central Coast Regional Plan 2036 (CCRP), which encompassed the new CCC local government area.

This plan encompasses a vision for the future of the Central Coast as a healthy natural environment, a flourishing economy and well-connected communities.<sup>1</sup> To achieve this vision four goals have been set. The second goal within the regional plan is to protect the natural environment and manage the use of agricultural and resource lands.<sup>2</sup>

To enable the protection of the natural environment a series of directions and actions have been included with the CCRP. Direction 12 focuses on the need to protect and manage environmental values of the region.<sup>3</sup> To realise Direction 12 a series of actions have been identified. Action 12.4 requires the need to strengthen the 'Coastal Open Space System by expanding its links and

extending new corridors to balance growth in the north of the region and protect the network of natural areas across the region'.<sup>4</sup>

Within the definitions of the CCRP, it defines the COSS as a network of reserves supporting native vegetation managed by the Central Coast Council.

In 2018, the CCC adopted One – Central Coast, Community Strategic Plan 2018-2028 (CSP). Objective F2 of the CSP is to “Promote greening and ensuring the wellbeing of communities through the protection of local bushland, urban trees, tree canopies and expansion of the Coastal Open Space System (COSS)”.<sup>5</sup>

In October 2019, the CCC released the Draft Urban Spatial Plan - Framework for a Local Strategic Planning Statement (USP-LSPS)

Within the draft USP-LSPS it identifies that “Council is preparing strategic guidance on how to manage terrestrial, marine and aquatic biodiversity on the Central Coast. This will include considering expansion of the Coastal Open Space Scheme (COSS)”.<sup>6</sup>

In October 2019, the CCC released the Draft Biodiversity Strategy. Throughout this strategy the COSS is referenced no less than sixteen occasions.

Taking into consideration the four strategic documents from both the State and Local Government it is evident that the COSS is a key component for the new CCC to administer. Within the draft Biodiversity Strategy, it states:

*“The concept of COSS should not be replaced, but rather enhanced by the opportunities present by the amalgamation ...”*

As Council already manages the Natural Assets it is recommended that within the LSPS that Council expand the COSS across all the identified Natural Assets.

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<sup>1</sup> Central Coast Regional Plan 2036, page 8

<sup>2</sup> Central Coast Regional Plan 2036, pages 9 & 29

<sup>3</sup> Central Coast Regional Plan 2036, page 34

<sup>4</sup> Central Coast Regional Plan 2036, page 35

<sup>5</sup> One – Central Coast Community Strategic Plan, page 26

<sup>6</sup> Draft Urban Spatial Plan - Framework for a Local Strategic Planning Statement Central Coast, page 75

## Observation S7

We note on page 111 of the draft LSPS it states under the heading of Consolidate our open space to encourage recreational multi-use open space destinations that:

*‘Opportunities to consolidate our open space assets should be considered in areas where other opportunities for parkland exist. ‘*

Should be deleted and replaced with



*“Opportunities to increase and enhance our open space assets should be prioritised where opportunities exist.”*

*Comment S7*

Any perceived open spaces must calculate with predicted increases in population. An example is the Greater Lake Munmorah Structure Plan indicating currently that the region has a population of 8,449 residents. A 3% increase as indicated in this plan would calculate to an extra 253 people. What is proposed in the Central Coast Regional Plan 2036 is a further 40,500 new residences that giving approximately 101,250 more people, being an increase of 1,200%. If the simple maths don't add up, how can the community have the confidence considering Lake Munmorah is considered to be an Emerging Town Centre with the closest Local Centre at Budgewoi being 2.3 km away with the closest Strategic Centre at Toukley being some 7.32 km without any direct public transport links. Lake Haven being the closest Emerging Strategic Centre being 7.89km, Wyong as the existing Strategic Centre being 25.72 km away and the Regional City of Gosford being 37.47 km away.

*Observation S8*

We note on page 111 of the draft LSPS it states under the transformative idea that:

*‘As part of an Active Lifestyles Strategy, undertake an audit to review the use of Small Parks and encourage the community in place-based consultation on the way single-use destinations may be better utilised’.*

*Comment S8*

In respect to the suggestion of a rationalisation of open space. We remind Council that far from being a transformative idea - this is a failed one, not supported by the community. In 2015 **thousands** of community members in the former Gosford LGA made this very clear when they expressed strong opinions and stood up against Gosford Council's planned sell-off of 25 local reserves, playgrounds and greenspaces. After 15 months of active campaigning these important community assets were saved. The community has made clear it values the community land it already has access to and seeks these lands expanded and enhanced rather than “rationalised and consolidated”. Smaller passive green spaces provide many community benefits which the community values highly.

*Observation S9*

A copy of the right-hand side of page 140 of the draft LSPS provided below illustrates the linkages and importance of our water supply across the Central Coast.



#### *Comment S9*

In our opinion of equal importance to supply of water in a strategic document is the linkages and importance of the sewer network that Council is responsible for providing. We recommend a map of the main sewer network along with key facilities such as treatment plants and ocean outfalls be provided on a separate map.

## Part C – Ward Related Matters

### *Concerns from residents who reside in the Budgewoi Ward*

The Budgewoi Ward is the northern area of the three “coastal wards” in the Central Coast Local Government Area. This ward contains Lake Munmorah and Budgewoi Lake and is constrained to the north by the southern end of Lake Macquarie and to the east by the Tasman Sea. As the ward is constrained by multiple water bodies it is imperative that development is sensitive to the natural constraints.

**The Budgewoi Ward includes:**

- The suburbs of Blue Haven, Budgewoi, Budgewoi Peninsula, Buff Point, Canton Beach, Chain Valley Bay, Charmhaven, Colongra, Doyalson, Doyalson North, Frazer Park, Freemans, Gwandalan, Halekulani, Kingfisher Shores, Lake Haven, Lake Munmorah, Mannering Park, Norah Head, Noraville, Point Wolstoncroft, San Remo, Summerland Point, Toukley, Woongarra and Wybung, the Central Coast Council area parts of the localities of Crangan Bay and Moonee, and parts of the localities of Gorokan, Hamlyn Terrace, Kanwal and Magenta.
- Lake Haven Shopping Centre
- Vales Point Power Station / Ash Dam
- Historical Norah Head Lighthouse
- Munmorah and Lake Macquarie State Conservation Areas
- Industrial land at Bushells Ridge

***The main challenges facing The Budgewoi Ward***

- The draft LSPS identifies this ward as one of the major growth areas.
- An ash dam that contains 26 million tonnes of toxic coal ash, some mixed with asbestos and stored in an unlined fifty-year old dam.
- Long term end use of the ash dam.
- Maintaining and improving the water quality of both Munmorah and Budgewoi Lakes while the catchments are identified as major growth areas.
- Community anxiety that Council has actively met behind closed doors with development lobby groups such as the Urban Development Institute Australia (UDIA) yet at the same time have not actively engaged with Community organisations. Throughout the Budgewoi ward there are small residential groups wishing to participate in the future of our ward.
- Actively engaging the community in constructive dialogue which will enable the community to have a positive input into the future of the Ward.
- No discussion or suggestions contained within the draft LSPS on how the vision for both Lake Haven and Warnervale Town Centre are to be funded.

**Suggested comments for The Budgewoi Ward**

**Strategic Vision**

The draft LSPS for Lake Haven and Warnervale Town Centre proposes to facilitate the development of a range of additional land users for leisure, entertainment, business, employment and housing that will increase community and economic activity. This vision is ambitious. However, because of the lack of community engagement we are concerned that the vision does not reflect the aspirations of the local community.

**Centres**

The Council needs to include policies in the LSPS that:

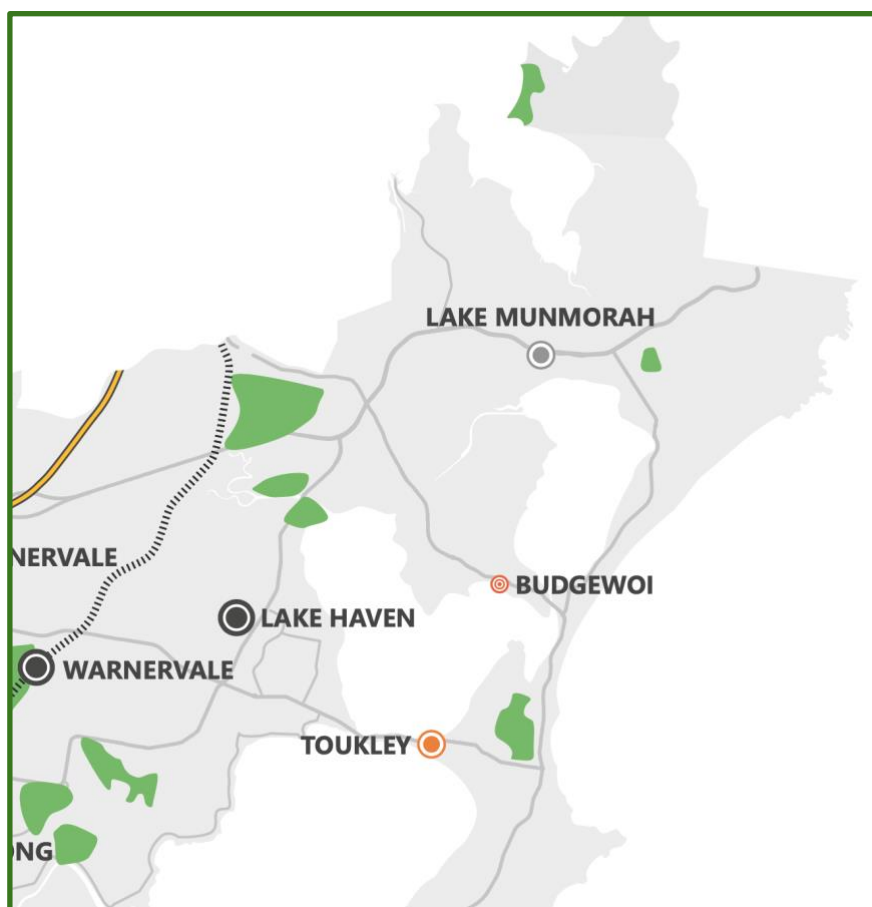
- Recognise that as major growth is anticipated within the catchments of Lake Munmorah and Budgewoi Lake that Council must implement stringent water quality.
- Recognise that as our region has the third largest aging population in NSW, that appropriate community facilities need to be included

### **Environment**

As the Lake Macquarie and Munmorah State Conservation Areas are located in the easter section of the ward, these areas need to have biodiversity wildlife corridors to other natural areas.

### **Open space**

Council to apply the COSS into the environmentally significant areas that Council already manages in the existing Natural Assets within the ward as illustrated on page 99 of the draft LSPS (copied below)



### **Community Plea from representatives within the Budgewoi Ward**

As there is such significant change being proposed for the Budgewoi Ward and lack of community trust it is imperative that the community has a greater say with the future development.

We do not regard having a questionnaire on Council's website as actively engaging the community in an effective dialogue. Having a questionnaire on the attributes for each ward and why on Councils website is firstly not informative consultation and will have the same result of less than 1% responding, as per previous questionnaires.

It is inevitable that changes will take place, yet it is the residential stakeholders that should have equal influence in what changes and how quickly they occur. The simple act of addressing our Council on a matter of concerns by any ratepayer is all but gone from what democracy we had in the past. Formally having five minutes to address those who approve final outcomes has now reduced to three minutes. Writing submissions for policies, strategies or proposed developments continue to fall on deaf ears, with very few replies to those heartfelt personal submissions.

The reason why the Community lacks trust with the Council is because of Council's actions. We note Council's acceptance of closed door meetings with developer lobby groups such as the Urban Development Institute Australia (UDIA) makes a mockery of Council working for the ratepayers or the community in general. Throughout the Central Coast are small resident groups screaming out to have their concerns heard, yet no one is listening, as large scale developments continue to be approved when Structure Plans are only in draft form and the Local Planning Panel (LPP) has not yet got its claws into our future.

A further reason why the Community lacks trust is illustrated in the Central Coast Regional Plan 2036. In this Plan, it proposed housing developments in the northern wards, being twice the number as the former North Wyong Structure Plan. Then the Greater Lake Munmorah Structure Plan (GLMSP), emerged. Very few residents know of its existence, let alone the hidden agenda. Consequently how can the community have any faith that the Council will listen to our concerns.

For example, the GLMSP says on page 11 that there will be a Biodiversity corridor starting at the ash dam to the south and proceeding north to Gwandalan, yet until you look at page 59, you find that most of the area is on the Consolidated Coal Lease 719, yet all mine subsidence approvals for the region have been recently & conveniently lifted with page 73 showing that within the biodiversity corridor is a Transgrid Electricity Easement which will have very little vegetation and one third of the corridor is currently under a Darkinjung land claim for 600 homes. It also does not include the threat of the findings of the cancer cluster report by Torrens University for the Cancer Institute.

Another example, across the road from the GLMSP is another proposal of equal size, from a totally unknown Doylo Lifestyle Group for a proposed 45 ha development at Doyalson. This consists of 140 low density residences, 220 manufactured home senior village, a motel/hotel, medical centre, childcare facility, fast food outlets, indoor and outdoor sports centre with a Raw Challenge facility, go cart track and paintball activity centre.

This proposed development has had no community consultation for a region that has the third largest aging population in N.S.W. Flippantly being able to go to Ronald's or the Colonel's for dinner, after a heavy day on the go cart track, working out in the indoor sports centre, plastering themselves with paint and eventually being carried to the medical centre, before picking up the grandkids from childcare, all on the same day.

This ill-considered and insulated proposal along with that proposed within the GLMSP ignores any consideration for environmental impacts, further traffic, nor the 26 Million tonnes of toxic coal-ash, some mixed with asbestos, stored in unlined fifty year old dams immediately opposite.

Developments which have gone to ground, yet approved is the Wallerah 2 Coal conveyor and loader near Blue Haven residential area, a substantial housing estate in Elizabeth Bay Drive Lake Munmorah & approvals of medium density units throughout Toukley, all having locals concerned.

The unlikelihood of studies into further infrastructures such as water & power, schools, flooding issues or air pollution have not seen the light of day. Whilst we are being led around by the nose and accept the whims of developers only concerned with profits for their shareholders, we the major shareholders of the Central Coast are kept in the dark and fed with you know what!

### *Concerns from residents who reside in The Entrance Ward*

The Entrance Ward is the central area of the three “coastal wards” in the Central Coast Local Government Area. Tuggerah Lake is the main natural feature in the Ward and it occupies over half the area of the ward. The land on the eastern side of the Lake and the areas south-east and south-west of the Lake are mostly in the Lake’s catchment. The only other significant catchment, at the southern end of the ward, drains to Wamberal Lagoon

The major environmental issues of The Entrance Ward arise from the impacts of urban development in the catchment of Tuggerah Lake. These issues are most complex because the main tributaries of the Lake are Wyong River and Ourimbah Creek, which drain the whole of the Wyong Ward.

#### **The Entrance Ward includes:**

- The urban areas of North Entrance, The Entrance, Long Jetty, Bateau Bay, Forresters Beach, Wamberal, Killarney Vale, Tumby Umbi (part), Berkeley Vale and Chittaway.
- Rural-residential areas such as Glenning Valley(part), Tumby Umbi (part), Fountaindale and Ourimbah(part).
- Tuggerah Shopping Centre and Tuggerah Business Park
- Berkeley Vale Industrial Area and Kangy Angy Rail Maintenance Depot
- Bateau Bay Shopping Centre and the retail strip thru Long Jetty
- The Entrance shopping centre
- Magenta Shores Resort
- Two national parks - Wyrabalong (North and South)
- Wyong South Sewage Treatment Plant.

#### ***The main challenges facing The Entrance Ward***

- Extensive local flooding in the low-lying areas around Tuggerah Lake and ongoing debate about The Entrance Channel
- Severe Coastal Erosion along Wamberal Beach
- Serious flooding of Ourimbah Creek, especially at Chittaway Bay, and impacts of Kangy Angy Rail Depot development on the floodplain.
- Flooding along Wyong River
- Protection of agricultural/environmental areas along Ourimbah Creek floodplain from inappropriate urban development.
- Loss of biodiversity, green canopy and an increase in the urban heat island effect on The Entrance Peninsula.



- Poor stormwater management in urban areas leading to Tuggerah Lake siltation and wrack problems.
- Increased housing development in The Entrance-Long Jetty area without a commensurate increase in employment or services for the increased population.
- Traffic congestion along Wyong Road
- Poor quality housing development in The Entrance-Long Jetty area.
- Traffic flow problems on The Entrance Road north of Wamberal.
- Development pressures on environmentally significant land in the Tumby Umbi-Glenning Valley-Fountaindale areas.
- Increasing vulnerability to natural disasters and climate change.

### **Suggested comments for The Entrance Ward**

#### **Strategic Vision**

The Local Strategic Planning Statement proposes to encourage significantly more housing development in The Entrance in its role as a Town Centre, but it does not propose a commensurate increase in employment or services for the increased population.

#### **Centres and corridors**

The Council needs to include policies in the LSPS that:

- Support employment growth on The Entrance Peninsula to reduce the proportion of trips on Wyong Road and The Entrance Road by people commuting out of the region.
- Encourage development of Bateau Bay-Long Jetty-The Entrance as a Growth Corridor which has coordinated development of housing, employment, infrastructure and community services.
- Develop and implement a long-term traffic flow and parking strategy for The Entrance – Long Jetty section of The Entrance Road, including priority for public transport services and safe routes/paths for pedestrians and cyclists.

#### **Housing**

- Improve the quality of housing development regarding privacy, solar access, noise

#### **Environment**

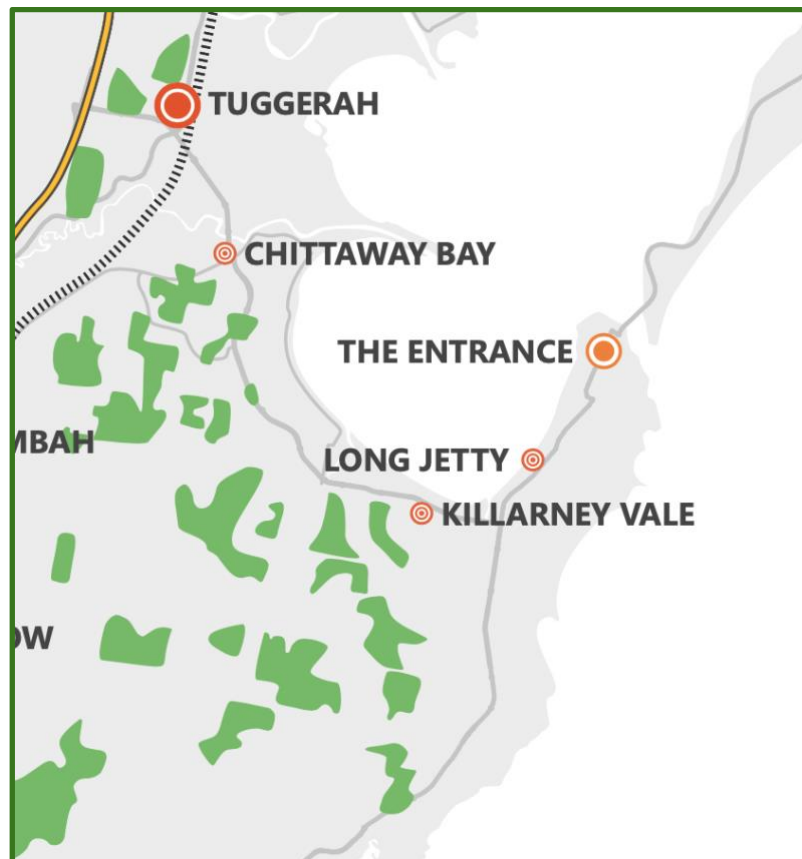
- Demonstrate how all the natural disaster and climate change vulnerabilities described on page 94 of the draft LSPS are being addressed specifically on The Entrance Peninsula and the flood prone areas around Tuggerah Lake.
- Take sea level rise predictions and increased flood levels into account in determining development controls for the areas around Tuggerah Lake and its tributaries.
- Apply development controls to prevent development from exacerbating flooding of the Tuggerah Lake catchment.
- Develop a long-term strategy to address the extensive and local flooding across the known black spot areas around Tuggerah Lake and its tributaries.

#### **Agriculture and rural**

- Maintain and strengthen development controls that clearly protect our local agricultural/environmental areas on the Ourimbah Creek floodplain.

### Open space

- Council to apply the COSS into the environmentally significant areas that Council already manages in the existing Natural Assets within the ward as illustrated on page 99 of the draft LSPS (copied below)



- Give priority to protecting and enhancing the quality of urban green spaces and tree canopy on The Entrance Peninsula.
- Protect the wetlands and creek reserves around Tuggerah Lake and its tributaries and recognise the extensive creek and foreshore reserves as important environmental community assets for shaded walk and cycleways.
- Protect and enhance public lands in The Entrance Ward, including drainage reserves, pocket parks, road reserves and nature strips, beach dunes, and public car parks

### Transport

- Develop public transport services with priority lanes on Wyong Road and The Entrance Road in congested areas, instead of providing more capacity for single occupant cars.

### *Concerns from residents who reside in the Wyong Ward*

#### **Northern Growth Corridor**

The Growth Corridor from Tuggerah to Warnervale suffers from some serious constraints. Most notably at Tuggerah where the area of Anzac Rd is proposed to be developed as a “*Town Square*” and as a link between the shopping centre and the railway station.

It is noted however that this area has been identified in the Draft Wyong, Ourimbah Creek Flood Study to be flood affected in a 20% event and the study conclusion is that Tuggerah Strait “*would experience significant property damage, risk to life and/or evacuation difficulties during floods*” As such it is unsuitable for the identified “*Town Square*”.

In fact, most of Tuggerah Strait has been included to some extent in the flood affected area identified in the study and this may influence the practicality of development of the Growth Corridor. The LSPS must describe how the flooding constraints will be dealt with to allow the realistic development of the area.

Further north the corridor adjoins the Porters Creek E2 Environmental Zone, and this too places a constraint on the usefulness of the growth corridor. The presently exhibited planning proposal to rezone sections of Precinct 7 places greater pressure on the remaining E2 zone so it is imperative this be retained to provide flood storage and environment filters for the Wyong River/Tuggerah Lakes complex.

The plan provided on Page 81 of the LSPS shows a large area of the Porters Creek wetland to be a future residential area, surely this plan is in error and the proposed residential area should be replaced with a plan which shows the true details of the area available for residential use.

Overall it seems the real “Growth Corridor” for the northern part of the Central Coast will continue to be the Old Pacific Highway from Tuggerah through to San Remo. Perhaps this reality should be reflected in the LSPS.

#### **Warnervale Regional Gateway**

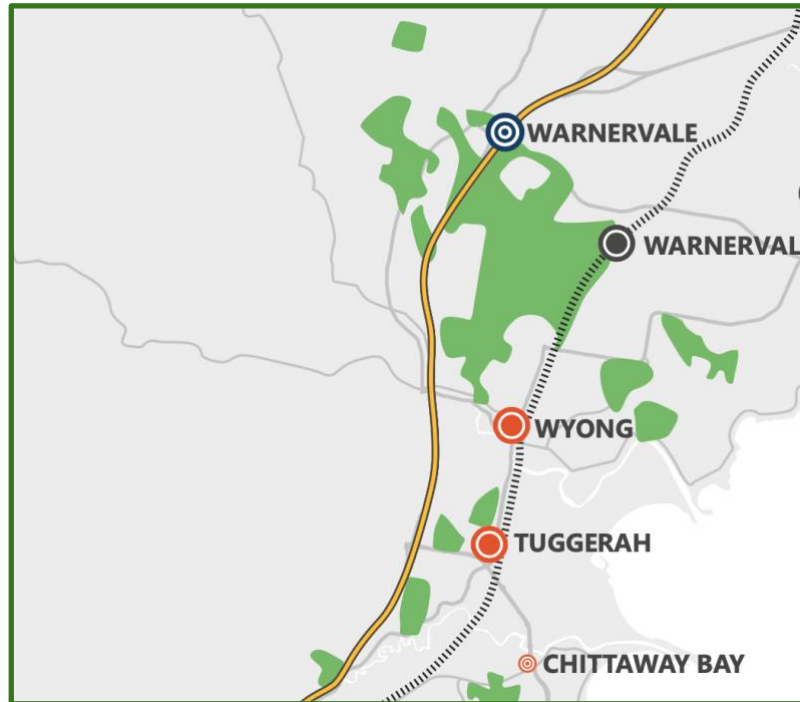
In the LSPS the Warnervale Regional gateway is proposed at the location of the present Warnervale railway station and the Study identifies this as a transport interchange. It is acknowledged that a “Neighbourhood Centre” zoning is provided at the present station location, but this is inadequate for the intended growth of the area.

The future Warnervale Town Centre is located in the area presently zoned B2 and B4 which is some 1.5 kilometres north from the present railway station.

The LSPS should consider this separation and encourage the relocation of the station closer to the town centre and onto the land already zoned E2 rail infrastructure. This would encourage a more efficient transport hub.

### Open space

- Council to apply the COSS into the environmentally significant areas that Council already manages in the existing Natural Assets within the ward as illustrated on page 99 of the draft LSPS (copied below)



### *Concerns from residents who reside in the Gosford West Ward*

Gosford West Ward is the largest geographical area within the Central Coast Local Government Area. As it is the largest geographical area it contains the most diversity as it includes:

- The urban areas of Gosford City Centre, Woy Woy, Umina and suburbs along the western edge of Brisbane Water.
- The villages along the Hawkesbury River
- Three (3) national parks of Brisbane Water, Popran and Dharug
- Main water supply of Mangrove Creek Dam, Mangrove Creek Weir, Upper Mooney Dam and Water Treatment Plant at Somersby
- Sewer treatment plant at the western end of Correa Bay Woy Woy
- Agricultural lands of Somersby, Mangrove Mountain and Kulnura
- Industrial land at Somersby

### *Challenges facing Gosford West Ward*

The main challenges facing this ward include:

- Extensive localist flooding across the Woy Woy sand plain
- Traffic flow and parking in Gosford City Centre
- Protection of agricultural land

- Loss of biodiversity, green canopy and an increase in the urban heat island effect on the Woy Woy Peninsula
- Coastal erosion Ettalong and Umina
- Poor stormwater management leading to Brisbane Water siltation
- Poor quality housing development on Woy Woy Peninsula - lack of off-street parking
- Traffic flow problems entering and leaving the Woy Woy Peninsula
- increasing vulnerability to natural disasters and climate change

### ***Future Direction and Action for Gosford West Ward***

Council needs to:

- demonstrate how all the natural disaster and climate change vulnerabilities described on page 94 of the draft LSPS are being addressed specifically on the Woy Woy Peninsula
- Give priority to protecting and enhancing the quality of urban green spaces and tree canopy on the Woy Woy Peninsula
- Protect the wetlands and creek reserves on the Woy Woy Peninsula and recognise the extensive creek and foreshore reserves as important environmental community assets for shaded walk and cycleways.
- Protect and enhance public lands on the Woy Woy Peninsula, including drainage reserves, pocket parks, laneways, road reserves and nature strips, beach dunes, public car parks
- Improve the quality of housing development regarding privacy, solar access, noise
- Take sea level rise predictions into account in determining development controls for the Woy Woy Peninsula
- Put in place local legislative controls to prevent development from exacerbating flooding of the Woy Woy sand plain
- Develop a long-term strategy to address the extensive and local flooding across the known black spot areas across the Woy Woy sand plain.
- Ensure a long-term traffic flow and parking strategy for the Gosford City Centre
- Put in place local legislative controls that clearly protect our local agricultural areas
- Adopt a local planning control of no urban expansion west of the M1 Motorway

### ***Concerns from residents who reside in the Gosford East Ward***

The Gosford East Ward is the southern area of the three “coastal wards” in the Central Coast Local Government Area. This ward includes the three coastal lagoons of Terrigal, Avoca and Cockrone and includes the eastern half of Brisbane Water. The ward contains a number of coastal centres of Terrigal, Avoca and Kincumber.

The major issues of Gosford East Ward is transport infrastructure, protection of COSS, development of the 5 Lands Walk walking trail, water quality within the lagoons and Terrigal Beach.

**The Gosford East Ward includes:**

- The suburbs of Avoca Beach, Bensville, Bouddi, Box Head, Copacabana, Daleys Point, Davistown, Empire Bay, Erina, Erina Heights, Green Point, Hardys Bay, Holgate, Killcare, Killcare Heights, Kincumber, Kincumber South, MacMasters Beach, Matcham, North Avoca, Picketts Valley, Pretty Beach, Saratoga, St Huberts Island, Terrigal, Wagstaffe and Yattalunga, and parts of the localities of Lisarow, Springfield and Wamberal.

- Brisbane Water
- Terrigal, Avoca and Cockrone Lagoons
- Erina Fair and Erina Shopping Centre
- Coastal Centres of Terrigal, Avoca and Kincumber
- Coastal Beaches
- COSS
- Bouddi National Park and Marine Reserve
- Kincumber and Woy Woy Sewer Treatment Facilities
- Sewer ocean outlet at Winney Bay.

#### ***The main challenges facing Gosford East Ward***

- Coastal Erosion along all the open coastal beaches
- Water quality of the Coastal Lagoons
- Transport infrastructure
- Traffic congestion at East Gosford
- Lack of local jobs
- Development of the 5 Lands Walking Track
- Overuse of Terrigal Beach and Terrigal Town centre
- Pressure of active public recreation within secluded areas of COSS
- Increasing vulnerability to natural disasters and climate change.

#### **Suggested comments for Gosford East Ward**

##### **Priorities**

- It is noted on page 65 of the draft LSPS the priority of establishing a 24-hour Main Street destination for locals and visitors for Terrigal. Residents of the Gosford East Ward do not support this priority. Due to the fact that Terrigal Town Centre is located within a confined space with only one major access road suggesting a 24-hour main street destination is viewed as illogical.
- The draft LSPS fails to identify Character as a core element within the strategic framework. We strongly recommend that Character is included as a core element.
- It is noted on page 44 of the draft LSPS the importance of defining an 'Urban Edge'. Members of the CCCBPG fully support the need to define where urban growth stops and where environmental protection starts. However, the identification of areas such as Picketts, Erina and Matcham valleys as urban areas on the map located at page 14 of the draft LSPS is illogical. Areas such as Erina Valley should be retained in its current zoning to allow for a mixture of land use and provide a buffer between the Natural Assets and Urban Centres.

##### **Centres**

- In the draft Urban Spatial Plan, Avoca Beach was categorised as a "Village". However, in the draft LSPS the concept of a village has been removed. Residents of Avoca regard the concept of a village as very important as it is a central element of the Character of Avoca. Avoca is not simply a shopping strip but it encompasses the full character of shops, beach with residential dwellings intermixed.

##### **Environment**



- It is noted that Avoca Lagoon has the lowest water quality of all of the four coastal lagoons. Historically Avoca Lagoon has exhibited severe eutrophication events. As a result of poor water quality within the coastal lagoons in the Coastal Lagoons Management Plan prepared in 1995, Council adopted a management strategy of no further urban development within the lagoon catchments. This management strategy which was adopted on scientific grounds was removed for political reasons. It is strongly recommended that the Central Coast Council reinstate this management opinion of no further urban development within the lagoon catchments based upon the scientific justification.
- It is noted on page 94 of the draft LSPS it lists the extent of native vegetation cover. However, the draft LSPS fails to appreciate and understand the importance of native tree cover within the urban setting. The tree cover across all the coastal suburbs is a key character of this ward and should be identified for its importance.

#### **Open space**

- Council applies appropriate resources to ensure adequate management of the COSS.
- The draft LSPS proposes centralised, multi-use locations. Residents within the Gosford East Ward highly value our small scale open spaces.

#### **Transport**

- Develop public transport services with priority lanes on major roads, instead of providing more capacity for single occupant cars.
- Investigate a loop road around Gosford City Centre and East Gosford

Yours faithfully



Gary Chestnut  
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on behalf  
Central Coast Community Better Planning Group