

Project Team

The project team members included:

Simon Waterworth
Senior Town Planner

Callie Griffiths
Junior Town Planner

Richard Elliot
Landscape Designer

This page intentionally left blank.

References

Parliamentary Counsels Office, (2008) Government of New South Wales Legislation home page, [Online]. Available: <http://www.legislation.nsw.gov.au>. [Accessed June, 2008]

Department of Land and Water Conservation (1997). *Acid Sulfate Soils Planning Maps*, DLWC

Department of Planning 2001 Integrating Land Use and Transport - The Right the Right Place for Business and Services — Planning Policy [online] Available: http://www.planning.nsw.gov.au/programservices/pdf/pol_transport.pdf

Salt, B (2006). The Big Shift (excerpts) 2006. [online] Available: <http://www.bernardsalt.com.au/publications.php?pld=22> [accessed 13 October 2008]

Spears, G (2002) *The Impact of Globalisation on the Regional Economy: Measuring 'Knowledge Intensity' and preparedness for the 'Knowledge Based Economy'*

Department of Planning (2007). *NSW Statistical Local Area Population Projections 2001-2031*, NSW Department of Planning.

This page intentionally left blank.

Copyright and Usage

©GeoLINK, 2008

The illustrations to this document were prepared for the exclusive use of Coffs Harbour City Council to accompany this Industrial Lands Strategy and they are not to be used for any other purpose or by any other person or corporation. GeoLINK accepts no responsibility for any loss or damage suffered howsoever arising to any person or corporation who may use or rely on this document for a purpose other than that described above.

No reliance should be placed upon topographic information contained in this report for any purpose other than for the purposes of this application. Illustrations accompanying this document may not be reproduced, stored or transmitted in any form unless this note is included.

GeoLINK declares that it does not have, nor expects to have, a beneficial interest in the subject project.

No extract of text of this document may be reproduced, stored or transmitted in any form without the prior consent of GeoLINK.

This page intentionally left blank.

Consultation Findings

Coffs Harbour Local Aboriginal Land Council

The Land Council advised that many areas of interest for industrial land would have potential archaeological sites, have identified sites within those areas, or would require further investigations. It was recommended that further consultation would be necessary when areas are formally identified for rezoning and development.

Department of State and Regional Development

The Department converses with potential developers seeking industrial land within the area. Generally, investors for manufacturing and wholesalers from larger metropolitan areas contact the Department when investigating potential sites within the region. Their experience has shown that there is a limited supply of larger sized, lower valued lots for industrial purposes within the area. Coffs Harbour is losing investors to areas such as Macksville where they can supply larger lot sizes for a smaller price. The service industries are currently well supplied. In general, Coffs Harbour is a preferred area for a developer considering industrial development; however the cost per square metre is too high, therefore the area is not as viable as it could be.

Woolgoolga Chamber of Commerce

The Chamber of Commerce has not previously discussed industrial land within the Chamber meetings. However, through consultation with Chamber members and real estate agents, the main concern for industrial development within Woolgoolga is the lack of larger lots. B-double access is also essential for industrial estates, and needs to be provided for with future development. An area recommended for investigation as a potential site is the area located north of Woolgoolga bounded by the existing highway and the planned new highway. Otherwise, the land identified within the Our Living City Settlement Strategy, west of the existing industrial estate, would be sufficient for smaller lots.

Sawtell Chamber of Commerce

The chamber of Commerce has observed that in general, people moving to Coffs Harbour have little chance of finding employment and therefore invest in their own enterprise (i.e. start or buy a small business). Coffs Harbour is reliant on small business and tourism and the current demand is for land for these purposes. However, the Chamber appreciates that future demand within the area will include other industrial uses and that currently there are no larger lots to accommodate larger or heavy industries.

It is understood that the Isles industrial Estate is sufficient to supply current demand however there will be more demand in next 24 months which will utilise the current vacant lots, leaving no real area for further growth within the locality.

The new Toormina shopping complex will increase population to the area which in turn will increase employment demand. Council should look at Bonville area as potential light/service industry which would service the proposed new population in Bonville and allow for creation of small businesses.

Coffs Harbour Chamber of Commerce

The Chamber consider that there is significant market interest for industrial land, but there is no available land to recommend to interested parties. In general, there is a demand for larger lots, with the recent loss of the potential ABI Group development a case in point, and a need for an increase of land supply. The strategy should recognise Business Park developments within the strategy, as there is currently a higher demand for Business Park type of tenancies.

The Chamber identified areas for potential consideration including those identified in the OLC Strategy. The area surrounding the Harbour could present a possibility, and would allow for growth of industry related to marine trade. North Boambee is another logical area, as it would provide a link with the growth of Urunga with the highway completion. Bonville, Moonee at Bucca Road and surrounding areas to the Moonee shopping centre were also areas also worthy of consideration.

Coffs Harbour Economic Development Unit/Coffs Future Development Board

The Unit converses with potential developers seeking industrial land within the area. As such, it has been apparent that there is an increase in enquiries regarding industrial development, however there is not enough land to supply the demand. Coffs Harbour is a preferred site for business with great access and location to the Pacific Highway. The main drawback to the area is there is not enough land to offer and the current supply of lots are not large enough for the needs of the industries.

Industries like a high unemployment rate and clustering of industry to warrant relocation, which is provided by the Coffs Harbour region. Potential developers are deterred from this by the cost of land which is far too expensive to gain any real benefit from the supply of workforce. Coffs Harbour needs to be able to cater for the expansion of existing businesses in the area, as this is not currently possible for some of the larger companies operating in the area.

Urban Development Institute of Australia (UDIA)

UDIA expressed concern for locating future industrial areas within the coastal zone. This concern is due to the complications of gaining consent for development within the coastal zone especially industrial uses. Other identified constraints include topography, environmental features and competing land uses east of the coastal range. The institute also considered that there would appear to be limited opportunity for suitable land of any significant size without compromising a range of such features. Concern was also raised for the location of industrial areas toward the entrance of town centres. Considering the area's heavy reliance on tourism, such development does not assist attracting tourists to the area.

The other main issue raised in terms of industrial land in the LGA, is the all encompassing single industrial zone currently provided for in the LEP. The zoning has lead to the broad range of uses located within industrial estates which are not "industrial" uses. An example is the current zone allowing for heavy industrial uses to occur adjacent to a place of worship or child care centre. The UDIA have experienced numerous instances of predominantly commercial and retail premises establishing within the current industrial zone. The one zone for industrial land is not considered to be effective.

Coffs Coast Manufacture

Coffs Coast Manufacture represents smaller manufacturing industries of Coffs Harbour. The general opinion of current industrial land within the Coffs Harbour LGA is that lot sizes are too small, land prices are too expensive, and isolation from other uses is necessary. Clustering of industries is also an important factor for companies looking at industrial land.

The major attraction to Coffs Harbour for industrial uses is the inexpensive nature of the area and the locality. However with the cost of land and small lot sizes it is not competitive enough to compete with areas nearby such as Macksville.

It was conveyed that generally, manufacturing does not require b-double access nor does it need to be located close to the highway. Manufacturing industries do, however, need to be isolated from adjoining uses so not restricted with space, operating hours, and traffic.

Areas identified by Coffs Coast Manufacture as potential sites for industrial purposes include the Airport lands, expansion to the Link Road area in Toormina, and Bonville, providing a link with the south (Macksville).

Coffs Harbour WE Smith

WE Smith is one of the largest manufacturing companies within Coffs Harbour. The company's current situation is that future expansion of the site is impossible as the current site is obstructed by environmental elements (SEPP 71 Wetlands) and the encroaching residential development.

The company expressed that for them as a producer of large and heavy machinery, transportation and freighting of these items are very difficult in the locality. Issues such as road and bridge weight limits, hilly terrain and winding roads, and height restrictions of transportation via the highway due to overpasses and bridges, can effectively landlocked industries and present issues in regards to size and quantities of products to export. These elements should be considered in the establishment of future industrial estates.

Other difficulties encountered by the company have been the encroachment of residential development to the boundary of the property. This has resulted in the restriction of the number of productive hours at which work can operate due to conflict regarding noise and the like. As a result, it is recommended an allowance is made for buffers between uses so as to reduce restrictions upon operations of the industrial areas.

Informing residents of existing industrial uses within the locality should also be included as part of the process.

In general, the preferred land for industrial usage is: large flat lots, wide entries to cater for b-doubles, well drained sites, a "drive through" entry and exit to reduce need for turning areas etc for trucks, and highway and port access. The company has experienced the benefits of operating in Coffs Harbour due to its stable workforce, and this should be promoted. There are a high amount of labourers available within the area, but businesses are restricted for employees when it comes to specialised positions.

Thermal Electric Elements

Thermal Electric Elements have encountered difficulty in the expansion of their business due to the size of the lot, locality to residential areas and land prices. It was expressed that relocating in Coffs Harbour was not viable, and that the most viable option would be to relocate to Macksville or Queensland. The current land prices for industrial land are comparable with relocating to Sydney which can provide better services and infrastructure. Due to the small lot sizes, companies have to look at buying 3 or 4 lots and consolidating, which is far too expensive to be a viable option. The provision for the expansion of existing companies within Coffs Harbour should be one of the priorities of the Strategy. Any expansion of existing industrial estates would be ideal.

Faircloth and Reynolds

Faircloth and Reynolds have been in their current location for 20 years. 20 years ago it was not difficult to find an appropriate site for the business. Over the years, the business acquired the adjoining lots to allow for future expansion. The company is now in a position to use these lots, and will expand. Therefore there was no need to look at relocating as the consolidated lots offer enough space for the expansion of the business.

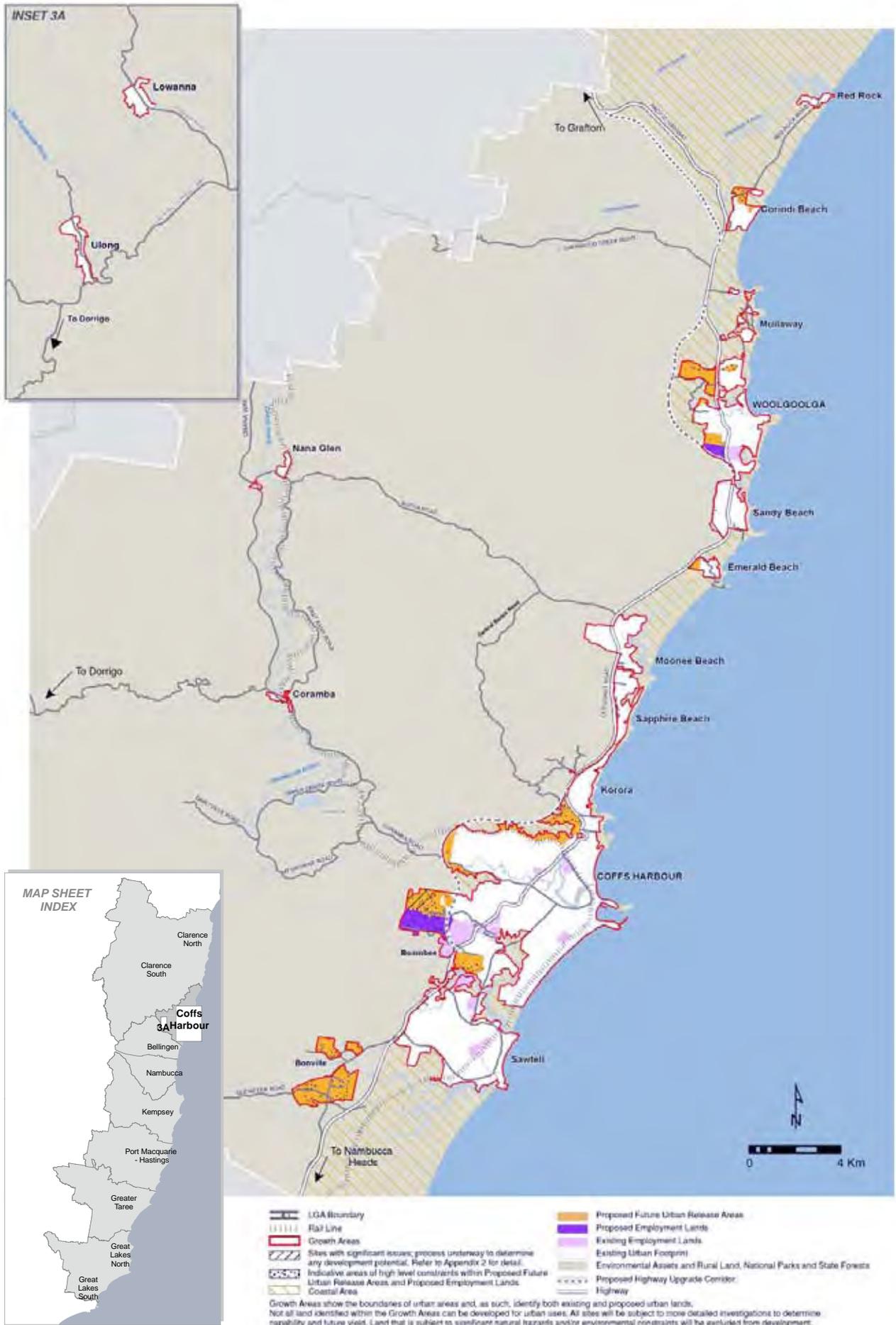
The primary needs of the company in relation to industrial land is; ease of vehicle access, location to transport services, parking, public transport access, and ease for employees to get to and from the site.

Generally, as the major transport services such as Lindsay/Fox and Brown and Hurley are located in town, it would be in the interest of industrial uses to be located near these. It is also beneficial to be located to other industrial areas, so looking at the expansion of existing industrial estates would be ideal.

The areas that would appeal the most on these grounds are the expansion of Isles Industrial Estate, North Boambee, and the Airport lands. It is commented that the Isles Industrial area is in an ideal location, and if this could be expanded it would be the best option. North Boambee is located in proximity to the Isles area, and therefore would also be a prime location to link in with this. The Airport lands also offer a lot of options given its proximity to town and large lots of available land. It is believed that Woolgoolga is located too far away from this "hub" of industry, and therefore would not be a preferred option due to its isolation.

Growth Areas Map for Coffs Harbour

GROWTH AREAS MAP 3 – COFFS HARBOUR



Public Exhibition Summaries

COFFS HARBOUR CITY COUNCIL DRAFT INDUSTRIAL LANDS STRATEGY SUBMISSIONS SUMMARY

GOVERNMENT SUBMISSIONS

A total of 12 government submissions were received from the following Government departments:

- Marine Parks Authority
- NSW Rural Fire Service
- Department of Environment and Conservation NSW
- Telstra
- NSW Department of Planning
- NSW Department of Primary Industries
- NSW Department of Lands
- NSW Roads and Traffic Authority
- Coffs Harbour City Council (4 separate submissions from various departments).

Matters raised are outlined in the following.

- **Zoning**

- (i) The Department of Environment and Climate Change (DECC) suggested a subregional approach should be taken with respect to industrial growth.
- (ii) DECC supported consolidation of lands at West Bonville (South) for long term industrial proposition.
- (iii) DECC supported the dismissal from consideration land at Black Adder Creek, West Corindi.
- (iv) DECC supported the use of mechanisms to differentiate the various employment areas through zoning in the proposed comprehensive Standard Instrument LEP.
- (v) DECC objected to a zone not to be included for the environmentally constrained lands, with "future investigation" applied to riparian or otherwise vegetated areas. It expects E2 or E3 zonings to be used in these locations and that urban development, including asset protection zones, would only be approved outside of these areas.
- (vi) DECC suggested that an appropriate subdivision pattern should be applied that does not preclude connectivity or linkages between isolated remnant vegetation patches.
- (vii) DECC supported the consolidation of industrial precincts.
- (viii) The Department of Planning (DoP) objected to the inclusion of part of Precinct 3 in North Boambee Valley, south of Englands Road. These additional areas were excluded in the draft Growth Area map for the MNC Strategy. These additional areas have been identified within the Department's draft MNC Farmland Mapping Project as Regionally Significant Farmland and sections are also zoned for environmental protection. As a result the DoP stated that they are unlikely to agree to the inclusion of such land in the final industrial strategy beyond that shown on the MNC Strategy Growth Area map. The DoP stated that the additional land may be considered further during a future five year review of the MNC Strategy for possible inclusion on the Growth Area map.
- (ix) DoP noted that the area of Precinct 4 is being heavily constrained by habitat and flooding issues. A request was made for further flood studies to determine the nature of floodwater movement in this locality and the likely impacts of future development on downstream areas. The DoP stated that these issues would need to be resolved before the Department could agree to the inclusion of the land in the final strategy document.

- (x) DoP stated that it is unlikely that they will support the inclusion of land in South Bonville West in the final industrial strategy due to these lands not being included in the draft MNC Strategy Growth Area map. The DoP states that the land may be considered further during a future five year review of the MNC Strategy for possible inclusion on the Growth Area map.
 - (xi) DoP supported the findings noted in the strategy which eliminated Corindi and South Bonville (east of the highway) from future industrial development.
 - (xii) DoP noted that part of the airport site currently zoned Special Uses 5A Aerodrome which has been identified for future industrial use needs to be clarified in a map as well as the need to address the future zoning of this area under the Standard LEP. Furthermore, the final strategy should include details of the proposed industrial use and zoning within this area.
 - (xiii) DoP objected to the zoning of IN2 Light Industrial for the Isles Drive Industrial precinct which contains a focus on Bulky Goods retail and suggests a B5 Business Development zone to reflect the current and/or future land uses in such areas. The remaining industrial zones in Isles Drive industrial precinct are supported.
 - (xiv) The Department of Lands requested that any zoning made in regard to the Showground precinct Crown lands are flexible to accommodate future land use options which may arise from the Masterplan. The Department also requested that the Showground Trust be included in any future consultation relating to this precinct.
 - (xv) The Roads and Traffic Authority (RTA) has advised the Englands Road Interchange with the Pacific Highway will impact on the availability and extent of possible industrial uses and zoned land in the vicinity of Isles Drive.
 - (xvi) The RTA has advised that prior to any rezonings to allow for increased bulky goods retail should not be carried out until a traffic analysis has identified the consequences to the Highway of increased traffic generation.
- **Bushfire Hazards**
 - (i) The NSW Rural Fire Service noted that land within the strategy is bushfire prone and therefore must comply with Section 79BA of the *EP&A Act 1979* or Section 100B of the *Rural Fires Act 1997*. The Rural fire service encourages the requirements of *Planning for Bush Fire Protection 2006* in the planning stages of future development.
- **Environmental Protection**
 - (i) The Marine Parks Authority (MPA) noted that proposed industrial land at Woolgoolga is within the catchment of Willis Creek, an Intermittently Closed and Open Lake and Lagoon (ICOLL) that forms part of the habitat protection zone of the SIMP. It is currently zoned for Habitat Protection.
 - (ii) MPA highlights that any new industrial lands need to meet the objections of the zone and that the objectives of the *Marine Parks Act 1997* are not compromised by future development.
 - (iii) DoP suggested that the biodiversity conservation lands data previously provided to Council by the DECC should be applied to the identified growth site of Woolgoolga in order to assess any potential conflicts. DoP further highlighted that the strategy should identify how such constraints or issues are to be mitigated.
 - (iv) DoP noted that Precinct 3 and 4 both contain patches of remnant vegetation containing potential koala habitat, therefore it is requested that Council needs to determine how connectivity between these habitat areas could be maintained or improved with areas planned for future industrial development.

- (v) DoP highlighted that no indication is provided within the draft strategy as to the outcome of any assessment Precinct 3 and 4 against the biodiversity conservation lands data provided to Council by the DECC, nor to how any constraints or issues may be resolved. The DoP requested that consideration of these aspects need to be included in any subsequent draft strategy provided for consideration by the DoP.
- (vi) The Department of Primary Industry (DPI) strongly suggested that any lands containing ecologically sensitive areas with SEPP 14 wetlands should not be included in the industrial land zoning. Furthermore, it is suggested that areas such as wetlands, creeks or significant riparian vegetation identified under the constraint mapping be zoned for environmental protection and should include sufficient buffers to mitigate any impacts from industrial land uses. It recommends a buffer of 50m – 100m for ecologically significant areas including wetlands and the habitat of threatened species.
- (vii) The Department of Lands highlighted that the area adjacent to Christmas Bells Road have significant environmental values and public recreation potential. A draft management plan for the area is currently being developed by The Coffs Harbour Racecourse Trust. They requested that due to the proximity of such lands to future industrial development, the likely impacts on environmental values and amenity due to future industrial development need to be taken into consideration by Council.
- (viii) The Department of Lands noted that the Howard Street industrial site is adjacent to the Coffs Coast State Park. Such lands were highlighted as having very high environmental recreation and landscape values. Additionally Howard Street was deemed by the Department to be strategically important as a potential alternative gateway access across the railway line to the State Park and the Coffs Jetty Foreshores precinct.
- (ix) The Department of Lands will consider opportunities for suitable development that effectively addresses the environmental values and existing buffer issues in the Orlando Street industrial precinct.
- (x) The Department of Lands suggested light industry or business development with 'green' credentials that would complement, or capitalise on the environmental values of the location.

- **Boundaries**

- (i) The DoP noted that the boundary of Precinct 3 as shown within the draft industrial strategy differs to that shown within the draft North Boambee Valley Structure Plan. They highlighted that this discrepancy should be resolved prior to the finalisation of both the Industrial Lands Strategy and the North Boambee Valley (West) Structure Plan documents.

- **Agriculture/Agribusiness**

- (i) The DPI criticised that the strategy did not appear to give consideration to agricultural resources in assessing the suitability of the land for industrial purposes. They state that the Mid North Coast Farmland Mapping should be utilised and referenced in confirming the boundaries of the proposed future industrial lands, especially in North Boambee Valley and Woolgoolga which are traditional agricultural producing areas.
- (ii) The DPI noted that the land on the north side of Butlers Road at Bonville, west of the Highway has been identified in the strategy as having potential for future (long term) industrial land uses as part of the Bonville Village growth concept. It recommends that the agricultural values of this land need to be assessed along with the relationship of this land with agricultural production in the broader locality.

- **Land Use Conflict**

- (i) The DPI noted that the proposed industrial land precincts of the North Boambee Valley and Woolgoolga will be adjoining agricultural land uses.
- (ii) The RTA has advised that any use of lands at Bonville will need to be checked in terms of capacity of the interchange at Archville Station Road to cater with heavy vehicles.

- **Sawtell Treatment Plant Site**

- (i) The CHCC City Services department advised the most economically viable option for the residual land at the Sawtell Treatment Plant was to retain the site for future Council purposes such as a depot, given the growth of Coffs Harbour and the potential of new release areas to the South of Coffs, of which the site could service more efficiently.
- (ii) The CHCC Recreational Services, Sports Unit and Biodiversity Unit objected to the redevelopment of the Sawtell Treatment Plant site for industrial purposes. The submission identified the site as harnessing a range of existing and potential Open Space values. Currently the land is subject to existing koala habitat and has been ranked to have very high ecological status. Therefore any industrial development would have a detrimental effect on the habitat values of flora and fauna species present at the site. This submission identified the best future use for the existing ponds and water treatment infrastructure (approx 4.5 Ha) to be utilised as a sporting precinct with access via Newcastle Drive. It was further highlighted that the Toormina area is currently underserved in terms of useable open space.

- **Use of Crown Lands**

- (i) The Department of Lands requested that given the range of impacts on Crown land from adjoining or adjacent industrial development, appropriate mitigation measures need to be implemented. The department does not support the use of buffer zones on Crown lands in order to achieve this.
- (ii) The Department of Lands expressed an interest to ensure that commercial development opportunities for Crown lands for industrial development are maximised.
- (iii) The Department of Lands made a number of comments regarding the use of Crown sites in Marcia Street. The Department objected to industrial uses on Part Lot 112 and part Lot 107 DP 752817 (which comprises Coffs Harbour State Forest No.864 Extension No.2 & No.3 respectively).
- (iv) The Department of Lands noted that the future use and development of the Marcia Street east Crown lands and their relationship to the adjoining Crown lands present significant issues for the Department and the Coffs Harbour Showground Trust. Refer to the Masterplan and Management Strategy for the Showground precinct which is currently being prepared by the Department.

- **Other Comments**

- (i) CHCC Property and Commercial division advised a number of changes relating to land uses within the Proposed Coffs Airport Industrial Precinct in Table 7.2:
 - Zone A Industrial Focus 9.243ha CHANGE TO 8.869ha
 - Zone B Industrial/Aviation 2.596ha CHANGE TO 1.153ha
 - Zone D Community Focus (likely industrial) 1.827 CHANGE TO 2.832ha
 - Zone G Aviation Focus 6.487ha CHANGE TO 5.74ha
 - Total area 153ha – CHANGE TO 18.594ha

- (ii) CHCC Property and Commercial Division also noted that the paragraph below the table should be amended accordingly and text should refer to “proposed industrial related development” and not just “development.” In addition the text below this table refers incorrectly to table 7.1 and should read 7.2.
- (iii) CHCC Economic Development Unit raised a number of minor typographical and grammatical issues:
 - Ref. 3.2 (p.7) Population at June 2007 was 68 992
 - Ref 3.2 (p.8) Inconsistent increments of yearly steps
 - Ref 3.3 (p.13) More recent figures available (ref *Coffs Economic Update*)
 - Total Labour Force 30 679
 - Participation Rate 44.5%
 - Total Employment 93.4%
 - Ref 4.1.5 (p.27) Include relative percentages useful when contextualised with age demographic tables.
 - Great Lakes 1.7%
 - Port Macquarie 1.7%
 - Coffs Harbour 1.6%
 - 4.2.5 (p.31) First sentence – Principal LEP rather than principle LEP
 - 4.2.7 (p.32) Investment *at*traction
 - 7.2.13 (p.51) Because of the relative/*y* size...
 - 7.2.14 (p.51) Overstated supply at Isles Drive.
 - 8.1 (p.87) Bearing in mind previous comments relating to ERP and Participation Rate, questionable to use 3,239 as an (accurate) base number.
 - 8.3 (p.92) Overstated available supply of land.
 - 8.4 (p.93) ...comparable sites *in* Ballina or Port Macquarie OR comparable Local Government Areas Ballina or Port Macquarie.
 - 8.5 (p.94) larger employees or *employers* into the LGA.
- (iv) CHCC Economic Development Unit suggested that it may be appropriate to consider zoning part of the south west corner of the long term future industrial land at Archville Station Road (illustration 10.15) for tourism-related use.
- (v) DoP noted that Council should ensure that the final industrial strategy meets the requirements for content and scope and a local growth management strategy, as set out within the Department's Settlement Planning Guidelines for the Mid and Far North Coast Regional Strategy areas (August 2007).
- (vi) DoP suggested that a servicing and infrastructure program summary for the supply of utilities and facilities to and within the proposed industrial development areas should be included in the final report.
- (vii) DoP suggested the final strategy should be called “Local Growth management Strategy – Industrial Component” in conformity with the new approach advocated in the Department's Settlement Planning guidelines.

COFFS HARBOUR CITY COUNCIL DRAFT INDUSTRIAL LANDS STRATEGY SUBMISSIONS SUMMARY

COMMUNITY (INDIVIDUAL & GROUP) SUBMISSIONS

A total of 20 submissions were received from individuals and community groups. One submission included a petition signed by 64 individuals. Community groups included the Ulitarra Conservation Society, National Parks Association (two submissions) and the Coffs Harbour Chamber of Commerce. Matters raised are outlined in the following.

- **General**

- (i) One submission noted that consideration should be given to the application of the blanket category 'general industrial' and raises concern that such a term may result in the light and heavy industrial operations to be restricted in expansion.
- (ii) Two submissions noted that the continual fragmentation of industrial lands through the creation of small lots is undermining Council's strategies which encourage large distribution operations, light and higher technology or advanced manufacturing, value adding services on agribusiness and other major employment generating industries.
- (iii) Two submissions highlighted that care needs to be taken in drafting the land use table for industrial zones so that the land uses allowed do not create compatibility issues with the genuine industrial activities.

- **Zoning**

Woolgoolga

- (i) One submission requested that areas within the proposed Woolgoolga industrial development site include rezoning for commercial uses under business zonings.
- (ii) Two submissions requested zonings for mixed use development with the integration of suitable business, office, residential, retail and other development in accessible locations so as to maximise public transport patronage and encourage walking and cycling.
- (iii) One submission requested the utilisation of tourism zonings
- (iv) One submission requested the timing for rezoning to be in the short term, and could co-inside before or with the commencement of the proposed Pacific Highway upgrade.

Hulberts

- (v) Two submissions objected to the inclusion of a mixed use zone (B4 Mixed Use) for part of the Hulberts Road area, on the grounds that such recommendations are outside the scope of the Strategy and should be a matter considered in a separate Business Lands Strategy.
- (vi) One submission received supported the industrial zoning recommendation of IN1, IN2 and B4 in Hulberts Road, Sawtell.

Bailey Centre

- (vii) One submission received supported the zoning recommendations of 150 Pacific Highway of IN2 and B5.

Isles Drive

- (viii) One submission requested that the area west of the Isles Drive Industrial Estate be rezoned IN1 General Industrial to allow for a variety of uses within this area.

- **Bulky Goods Retailing**

- (i) Two submissions strongly objected to the strategy recommendations which will allow bulky goods retailing in the proposed IN2 Zones at:
 - Cook Drive;
 - Mansbridge Drive;
 - Isles Drive;
 - Hulberts Road; and
 - Marcia Street

It is highlighted in the submissions that the creation of five Bulky Goods retailing areas is a contradiction to the recommendation for two Bulky Goods clusters in the region.

- (ii) One submission highlighted that it may be appropriate to use Homebase as serving the North of the City and the Isles Drive area as serving the south of the City for bulky goods retailing and to zone these areas accordingly (IN2 for Isles Drive and an appropriate business zone for Homebase), with the remaining industrial areas not be zoned to allow for Bulky Goods retailing.
- (iii) Two submissions objected the proposed zoning of large tracts of land adjacent to the Pacific Highway at the entryways to the City for Bulky Goods retail development due to access and visual aesthetic impacts.
- (iv) One submission requested that bulky goods be included as a permitted use in the IN2 Light Industrial Zone in Mansbridge Drive, Cook Drive and Isles Drive or to zone these three areas as B5 Business Development and/or B7 Business Park with the inclusion of bulky goods premises in the permitted uses.

- **Visual Aesthetics**

- (i) Two submissions specifically commented on the visual aesthetic of the current industrial estate of Bosworth Estate and suggested that visual amenity and security needs to be improved.
- (ii) Two submissions noted that within the visual constraints of the existing Highway, as well as the proposed Sapphire to Woolgoolga Highway Bypass, design guidelines should be devised as to increase the visual aesthetics of industrial areas.

- **Industrial Demand**

- (i) Four submissions noted that the strategy did not appear to take into account land available for industrial uses outside the Industrial zones such as the business and rural zones which allow industrial development and ignores the business areas such as 'Homebase' which provide for bulky goods retailing. Without taking these into account, the supply figures appear to be understated.
- (ii) Two submissions noted that there is already sufficient land available for Bulky Goods Retail and that the provision of genuine low cost 'broad acre' industrial land that can be developed to provide large spaces for noisy industrial works, with well planned roads (for heavy vehicles) and proper water management is desired.

- (iii) One submission noted that Council should be identifying suitable tracts of land that are sufficiently away from any foreseeable residential development with close proximity to the Pacific Highway and preferably the railway (with strict industrial zonings that do not include retailing), in which Council may be develop the estate to ensure the intent of the development zoning is achieved. Areas that are suggested included:

- South Bonville
- Near Safety Beach
- Glenreagh
- Glenreagh
- Karangi
- Halfway Creek

- **Industrial Lot Sizes**

- (i) One submission noted that it may be desirable to reduce the minimum industrial lot sizes to accommodate industries that require less space, from an economic, cost effective standpoint.
- (ii) Four submissions noted that there was an acute shortage of larger land parcels which are needed to attract larger industrial uses with greater employee requirements. Additionally it was noted that the creation of smaller lots causes fragmentation of the industrial lands and therefore undermines Council's strategies.
- (iii) Three submissions recommended a minimum lot size of 10,000m² for the land at the airport.

- **Airport Land Zoning**

- (i) Two submissions objected to the retention of the special uses zone for the airport land which is marked for industrial development, on the grounds that special uses zones are too flexible and inappropriate in relation to the adopted Airport Master Plan.
- (ii) Two submissions recommended that the airport subdivision should await the outcomes of the Draft Industrial Lands Strategy to avoid the strategy being undermined.
- (iii) Three submissions objected to the airport land being used for any other purpose other than general aviation.

- **Ecological Conservation**

- (i) Two submissions strongly recommended that areas of 'potential ecological constraint' be set aside from development at the proposed airport site.
- (ii) Four submissions requested careful monitoring of any development on the Hamilton Drive site due to the presence of SEPP 14 (Wetlands) and koala habitat.
- (iii) Two submissions noted that due to the high conservation value of the Isles Drive Industrial area (flood prone and a permanent waterhole for local fauna) a 50m buffer should be applied on land designated 'Potential Ecological Constraint'.
- (iv) One submission encouraged Council to develop models that encompass peak oil and carbon emissions as it applies, or will apply to Industrial lands.
- (v) Two submissions highlighted that in light of the limitations of industrial development due to the constraints of vegetation and its associated habitat values, these limitations should be identified upfront before finalising the strategy so that a clear picture of supply can be determined.

- (vi) A petition signed by 64 people in addition to five other individual submissions requested that vegetated sections of the proposed industrial lands on the Boambee flood plan be identified and protected for eventual inclusion in a nature reserve or regional park. It is further requested that the remaining natural areas between Boambee and Sawtell Headlands and Tolhurst Lake must be added to the Coffs Coast Regional Park or a nature reserve.
- (vii) A petition was received, and was signed by 64 people in addition to five individual submissions requested that areas of native vegetation (this includes koala habitat, high conservation value wetlands or habitat for threatened fauna species) currently zoned for industrial development should be immediately zoned for environmental protection and steps taken to secure their long term sustainability through gazettal as part of the coastal reserve system. This includes the areas of Christmas Bells Road, Hamilton Drive, Englands Road, Isles Drive and Mansbridge Drive and other areas.

- **Flood Prone Land**

- (i) One submission noted that due to future effects of Climate Change discussed at the Coffs Harbour Climate Change Consensus consideration needs to be given to the proposed industrial development sites adjacent to the airport and Christmas Bells Road which have been identified as being low-lying areas which will be inundated permanently or subject to regular flooding in future years. In light of flooding this submission proposed that the extensions to the industrial land area at the airport and Hamilton Drive Boambee be abandoned.

- **Boundaries**

- (i) One submission noted that the boundary is breached in the Howard Street Industrial area.

- **Public Exhibition Comments**

- (i) Two submissions objected to the inappropriate timing of releasing the Industrial Lands Strategy (Christmas).
- (ii) One submission noted that it may be appropriate to release the document for public comment at a different time of year or have a longer comment time attached to its release.
- (iii) One submission noted that background documents, including fauna and flora studies undertaken in the subject areas were not included in the material available on Council's website.

- **Other Comments**

- (i) One submission noted that in the section on 'methodology' residents were not included as 'stakeholders.'
- (ii) One submission noted that in the 'outcomes' section it is stated that influence will be felt from 'a number of changing economic trends and external factors' however it is requested that these factors are listed and discussed.
- (iii) One submission noted that in part 2.4 in highlighting the industry shifts in the Coffs Harbour LGA from industry to an increasingly service orientated industry; the demand should take this into account. It requested that Council ensure that non-industrial uses are not catered for in the industrial zones.